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

The following response has been prepared on behalf of the 722 members of the Loch Lomond Angling Improvement Association (LLAIA) and in consultation with the Loch Lomond Fisheries Trust (LLFT) and Riparian Owners:

**Executive Summary**

The LLAIA and LLFT 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 our 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 we 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 radical changes outlined.

The financial and governance relationship between the anglers and riparian owners in the Loch Lomond and Endrick River SAC is without precedence in Scotland and merits that the system be considered as a “special case”. Members of the LLAIA come from diverse sections of society, encompassing substantial numbers of people who are disabled and/or elderly. These members gain enormous health and well-being benefits from “green exercise”, thereby enabling them to stay fit and active for longer throughout their lives. Significant numbers of LLAIA members volunteer to improve habitats through clean-up of rivers and removal of invasive plants. They also support the monitoring of fish stocks through electro-fishing and redd-counting. The LLAIA 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 LLFT 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 decisions on the balance between stock conservation and sustainable harvesting of migratory fish through a raft of conservation measures taken 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 5 salmon in a season. In 2016 the LLAIA committee will seek to introduce a ban on the killing of any salmon before 1 June, a reduction in the number of tags issued to members from 5 to 3 and a further restriction that will allow only one salmon to be taken per day.

Implementing any change for a large and diverse membership, particularly with regard to more enlightened conservation practices requires education and gradual influencing. This is much more likely to be successful if these changes are undertaken in a collegiate and collaborative way as has been the case to date with the LLAIA.

We believe that the external imposition of a grade 3 (100% catch and release) regime on the Lomond catchment and Endrick River SAC from 2016 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. We propose that the uniqueness of not only the biological systems of the Loch Lomond catchment area, but also its socio-economic systems and strong scientific and nature management partnerships be fully recognised by Marine Scotland, thus enabling the important and highly productive work of the LLFT and LLAIA trustees, members and volunteers to go on, resulting in the continuing improvement of the habitat and management of the systems. This would enable the Loch Lomond organisations to continue to act on a local basis, within a strong national network; thereby protecting and preserving the unique populations of salmon and sea trout present in the system as well as important and/or threatened species of coarse fish and eels, particularly pike, eel, powan and lamprey.

In view of the current data available on the juvenile fish populations, increases in average catch per angler and the improvements to riverine management that has occurred since 2013, in combination with the inherent financial and ecological management risks associated with 100% catch and release, we ask Marine Scotland to consider either:

* Reclassifying the Lomond System and Endrick River SAC to be a Category 1 or 2 system, or
* 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.

**Preamble**

As you may be aware angling is regarded as one of the most popular leisure activities within the UK. The Final Report of the Social and Community Benefits of Angling Project indicated that 9% of the population over 12 years of age in England and Wales (4.2 million people) had been fishing in 2010. It also cited that EA rod licence sales had increased by 35% from 2000/01 to 1,431,981 in 2011 and in Scotland, sports participation statistics show that around 3% of adults (16+years) and 3% of children (8-15 years), equivalent to 155,055 people, took part in angling during the most popular two months of each year in 2006-2008, a figure which has remained fairly constant since 1987.

While the popularity of fishing is beyond doubt there are other benefits from fishing that were highlighted in the Report. In particular it noted that duration of activity is typically much longer than other sports and participation can take place throughout a person’s lifespan contributing to lifelong activity and ‘active ageing’. The membership of the LLAIA reflects this assertion with 167 of our 722 adult members aged 65 years of age or over and at least 49 aged 75 or over.

 The report goes on to argue that angling provides opportunities for many different levels of physical activity for people of all abilities, including the less able. The membership of the LLAIA also reflects this assertion with 34 of our 722 adult members classified as disabled and in receipt of the appropriate state benefits. This is important as local councils and both the Scottish and Westminster Governments continually stress the need for good physical health and fitness within our communities, particularly as people are living longer and need to remain fit and active for longer.

One of the most important issues that the Report highlights is that angling plays a key role in getting people active, particularly those who might otherwise fall outside of ‘mainstream’ sports participation. How people fish is also important with the type of fishing practiced by our members when fishing the Rivers Endrick, Fruin and Leven as well as the Clyde estuary, namely wading and constantly casting and retrieving spinners or fly fishing, characterised as being a medium to high intensity activity. As can be seen from our membership details the Association caters to a diverse membership and helps encourage people to be active later in life as well as when faced with disability, providing sustained duration of physical activity together with green exercise that provides, according to the Report, inherent health benefits.

Angling though is more than just about health it encourages community engagement and can be the catalyst to stimulate a renewed interest and pride in the local environment, contributing to wider benefits across the entire community. The annual River Leven clean-up has over the last 4 years led to tons of rubbish being lifted from the river and the surrounding bankside, creating a healthier environment and rehabilitating once neglected natural environs.

A strong and vibrant LLAIA therefore contributes meaningfully and significantly to the local communities through which our waters run. However all of this is now threatened by the proposed grading of the Lomond system and the River Endrick SAC as a grade 3 water, which necessitates the introduction of 100% catch and release.

**Challenge to the Rational of the Catch-and-Release Proposal associated with the current Grade 3 Status**

According to the supporting documentation provided with the review team proposals the decision whether to classify a water as a grade 1, grade 2, or grade 3 was based exclusively on average 5 year catch data held for each river district under consideration. To quote paragraph 2.1 'The only information available for estimating the level of salmon stocks throughout Scotland is from reported rod catches and this forms the basis for the assessment.' Such data is we would argue meaningless on its own and indeed paragraph 2.2.1 of this document confirms that the data is not just meaningless but inherently flawed stating that we should be relying on - 'long term monitoring programme that produces a stock and recruitment curve relating the number of spawners in each year to the subsequently derived progeny'.

The reason why the scientists working for Marine Scotland have not used proper scientific analysis is, to quote paragraph 2.2.1 again, because - 'such data (stock and recruitment information) is scarce', and even more incredibly - 'an SR curve for a river stock is available only for salmon in the River North Esk.'

As well as using a flawed measure (catch returns) we would argue that there are other major areas of concern in how Marine Scotland scientists went about determining the grade of our system. The most obvious point is to question why fisheries were assessed on a district rather than an individual basis. This approach aggregates individual river catches with those of other fisheries in a given catchment area, which may or may not have accurate catch returns. For instance according to the low definition map that was produced in evidence it would appear the Lomond system is aggregated with the Clyde, the Kelvin, the Black and White Carts and their respective tributaries. The Lomond system is totally different from the other rivers that we have been assessed with in that we have at the centre of our system one of the largest bodies of freshwater in the UK which provides a relatively safe haven for most of our migratory fish stock. How can our system therefore be compared with the river only systems of our neighbours where such safe areas do not exist?

In addition the criteria used to determine fishery grade was based on a value obtained by dividing the annual salmon catch by the "wetted" area of the fishery. If the resultant value is high enough the fishery can continue to harvest salmon. We believe this analysis should be performed on a case by case basis for individual rivers as in many cases the wetted area may be significantly greater than the actual area that salmon can access. In the Lomond system salmon migration is halted by a number of natural barriers, for instance the falls at the loop of Fintry on the River Endrick and the Douglas falls on the River Douglas. Simply put dozens of miles of potential spawning are inaccessible to fish due to the natural configuration of the landscape. Moreover certain waters in our system do not and never have supported salmon. In particular the River Falloch might appear to offer miles of potential spawning, however, it does not have and never had a run of salmon and in any case all fish movement is impeded by the falls of Falloch only a couple of miles upstream from Loch Lomond.

At the very start of this consultation process the LLAIA were informed that Marine Scotland would provide full details of the calculations used to determine our fishery grading, to date this information has not been made available,. One would like to think that it would be a relatively simple matter to provide such information given the importance of the calculation. By not timeously responding to this request this would tend to indicate that the figures used by Marine Scotland would be unlikely to stand up to wider scrutiny casting into doubt the credibility of this report and its subsequent recommendations.

Therefore, rather than basing a river’s grading on long term monitoring and producing open and transparent in-depth information that explains to all affected parties how a grading was made relative to certain assumptions around the wetted area and salmon movement, we now witness a rush to conserve (see evidence on Poaching below however) based on a non-scientific measure of stock which in our view is flawed in the extreme in so many different ways.

**Collaborative Working and Voluntary Effort**

The LLFT is an environmental charity that was formed in 2001 to champion the conservation and restoration of Loch Lomond's native fish populations, their habitats and the freshwater environment and it is fully supported by the LLAIA.

The aim of the Trust is to maintain and restore aquatic biodiversity in and around Loch Lomond by means of practical, responsible and sustainable approaches to water, land and fishery management based on sound science. Numerous studies have been undertaken by the trust of key spawning areas and an accepted figure for minimum conservation limits agreed for the upper Endrick. According to redd counting data these limits have been reached on an annual basis meaning the SAC is a sustainable fishery.

In addition the Trust relies ultimately on a large number of enthusiastic volunteers to enable it to engage in a wide range of scientific projects. Arguably those of greatest interest relate to the survey of juvenile fish stocks and the annual smolt migration and redd monitoring exercises. This year the Trust together with SCENE and volunteers from the LLAIA undertook a ground breaking smolt tagging exercise on the Lomond system, a first in the mainland UK, that is expected to produce a significant insight into smolt migration and survival rates. This work would not be possible if it were not for the efforts of a large number of local anglers who are committed to the improvement of fish stocks.

The potential impact of rendering the Lomond system a grade 3 fishery is fully outlined below. Needless to say it is highly unlikely that the LLFT will survive in its current form without the LLAIA to the complete detriment of the Lomond system.

**Evidence of Stock Levels**

In 2014 a comprehensive review was undertaken of 5 year average declared catch returns on the Lomond system dating back to 2000, a period of 15 years. The figures for salmon compared (average weight in brackets) with average membership numbers were as follows:

|  |  |  |  |
| --- | --- | --- | --- |
|  | **2000-2004** | **2005-2009** | **2010-2014** |
| Loch Lomond | 56 (8.2 Lb) | 81 (7.9 Lb) | 62 (9.7 Lb) |
| River Leven | 71 (7.4 Lb) | 64 (6.8 Lb) | 54 (8.9 Lb) |
| River Endrick | 75 (6 Lb) | 100 (5.6 Lb) | 112 (6.5 Lb) |
| River Fruin | 7 (7 Lb) | 21 (5.8 Lb) | 21 (6.4 Lb) |
|  | 209 (7.1 Lb) | 266 (6.6 Lb) | 249 (7.8 Lb) |
| Average members | 942 | 945 | 735 |
| Salmon : member | 0.22 | 0.28 | 0.34 |

Therefore although there has been a slight dip in the 5 year average figures, when compared against our membership numbers we can see that there has been a 55% increase in the number of salmon caught per member in the same period. Anomalies such as the fall in the number of salmon caught on the Leven should be seen against a backdrop of a sharp fall in the number of Leven only members falling from 326 average in 2000/2004 to 257 in 2010/14 a drop of about 21%, which is similar to the fall in catch numbers.

Most significantly has been the increase in salmon caught on the River Endrick over the last 15 years from an average of 75 per year to the current 112 taking into account those members who can fish the Endrick this has seen a salmon: member ratio rise from 0.12 to 0.24 a 100% rise in the last 15 years. This completely throws into doubt the grade 3 rating for the Endrick SAC.

Therefore based on the Marine Scotland figures of choice, the rolling 5 year catch average it is clear to see that the Lomond system has improved significantly over the last 15 years, by a factor of ~55% when angling pressure is taken into account.

However, as noted above catch averages are no use on their own and we do not wish to rely on these figures alone to justify our inclusion as a grade 1 or 2 water. Over the last 5 years a great deal of voluntary time and energy has been put in to monitoring the stocks on the system through electro-fishing of key spawning sites as well as seasonal redd counting.

In the summer of 2015 electro fishing surveys were undertaken of the key spawning areas in the upper reaches of the River Endrick and the River Fruin as well as in various tributaries. The results indicate that the number of juvenile fish within the system at the sampled sites is at a healthy level and strengthens the assertion that there have been sustainable fish runs on both the Endrick and the Fruin the 2 most important tributaries within the Lomond system.

Moreover redd counts on the Endrick are also showing year on year improvements which again backs up the assertion that the system is healthy and contains sustainable stocks of salmon. The Endrick redd count measures dating back to 2001 have been forwarded to Marine Scotland under separate cover and the figures for the last 6 years are reproduced below:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 |
| River EndrickCoolies Lynn to KIlunan | 138 | 145 | 176 | 162\* | 240 | 145\*\* |

\* Approximately 2/3 count of previous years due to high water
\*\* Only half count of previous years due to high water conditions

**Current and Proposed Conservation Measures**

For some time now the LLAIA has attempted to strike an appropriate balance between stock conservation and allowing sustainable harvesting of migratory fish stocks. Before 2012 this was achieved through voluntary restrictions albeit there has been a long standing ban of killing any sea trout before 1 May each year (introduced over 10 years ago). However in 2013 the membership adopted a raft of conservation measure designed to protect and enhance our stocks of migratory and coarse fish. Before the government considered introducing a national tagging system last year the LLAIA had been operating its own tagging scheme since 2013. This scheme limited members to kill a maximum of 5 salmon in any given season, however, from catch returns it is now extremely rare for anyone to declare the killing of 5 salmon in any given season.

In addition rules were introduced that prohibited the killing of all fish after 30 September each year and restricted the number of sea trout that could be killed in a single day, as well as introducing stringent new regulations aimed at preserving the pike stocks on Loch Lomond.

In 2016 the Committee intend to introduce new conservation rules which will see the return of all fish before 31 May, a reduction in the number of tags issued per angler down from 5 to 3 with only 1 salmon being harvested per day.

**Bailiffing and Fish Protection**

The LLAIA currently spends around 60% of its income on fishery protection. Employing 2 full time bailiffs and utilising the expertise of several volunteers providing system wide coverage all year round. The Association is now seen by most anglers as a community based club and as a result we have witnessed a decline in poaching incidents within our main carrier the River Leven. There are some who still attempt to flout the rules, most often breaking local club bye-laws or fishing without a permit, but these are minor infringements compared with what happened even in the recent past.

There are, however, still major poaching related incidents occurring on the Clyde estuary. Individuals have been reported to the Procurator Fiscal for netting the estuary and the bailiffs and watchers spend considerable amounts of time patrolling this main arterial route that is the gate way not just to the Lomond system but to the Black and White Carts, the Clyde and the Kelvin. Therefore many clubs upstream of the Erskine Bridge rely on our vigilance to ensure that their fish stocks make it safely into their natal streams.

As long as the club is seen to fairly represent the vast majority of anglers fishing the system then it is strongly believed that in-river poaching will be curtailed giving our bailiffs more time to detect and prevent poaching on the Clyde estuary. Without our Bailiffing presence the Clyde estuary would be sharply exposed to poaching gangs and fish stocks would suffer greatly as a consequence.

**Affordable low cost salmon fishing and an equalities duty**

The LLAIA strive to provide low cost salmon angling for what might once have been called ordinary working class anglers. The majority of our anglers have a G81/G83 post code and reside within the West Dunbartonshire area which is statistically one of the most deprived in Scotland. The remainder of our anglers come in the main from the greater Glasgow area, as well as West Renfrewshire and Argyll and Bute.

We are very much a local club serving a local need for low cost salmon fishing. The cost of a River Leven/ Clyde estuary only membership, which runs from 11 February to 31 October, is only marginally more expensive than a day’s salmon fishing on a mid-river beat of the Tay in September, meanwhile the cost of a full membership covering Loch Lomond, the rivers Leven, Endrick and Fruin and the Clyde estuary is less than a day’s fishing in September on a mid Tweed beat.

What is more 167 of our 722 adult members are aged 65 years of age or over and at least 49 are aged 75 or over. In addition 34 of our 722 adult members are classified as disabled and in receipt of the appropriate state benefits. Therefore 201 of our 722, or 28% of our members, are in identified groups that have in the past been highlighted as suffering from higher levels of poverty than the national average and are classified as having protected characteristics with respect to equalities legislation. As a result we are now demanding that in accordance with the relevant duties the minister ensures that a full equalities impact assessment is undertaken relative to the impact of these proposals on our elderly and disabled members

It is our assertion that the LLAIA performs a core roll of encouraging people into salmon fishing through the adoption of a fair and affordable pricing structure that allows even the poorest in our society to participate and does not price them out of the sport. Yard for yard and mile for mile association water accommodates far more anglers than the more exclusive stretches of river ever will offering low cost salmon fishing to those whom cannot afford to fish elsewhere.

**Possible impact on LLAIA should the Lomond / Endrick SAC catch-and-release only from 2016 onwards**

**2016**

1. **Reduction in member numbers**
From conversations with anglers it is anticipated that the Association will lose at least 50% of our membership in 2016. While at this stage this estimate is only anecdotal in nature it ties in well with the experience in Wales when proposals were presented to turn the rivers Mawddach and Wnion 100% catch and release in 2010. On this occasion the projected fall in membership was put at nearer to 60% following a survey of club members. Therefore it is clear that a switch to 100% catch and release will in all likelihood severely impact on club membership. It is also anticipated that day ticket sales will also fall and we believe that a factor of 50% is also likely.
2. **Reduction in income**With a 50% reduction in membership and day ticket sales annual income will fall considerably. The turnover of the LLAIA has been relatively steady over the past 5 years and averages about £110,000 per annum. A 50% reduction in the number of memberships and day tickets sold will reduce our annual income to around £55,000 in 2016. Local shops who provide sundries and fishing tackle to visiting anglers will also be impacted.
3. **Removal of bailiffs**The first impact of the reduction in membership will be the requirement to lay off our 2 full time bailiffs as there is no other way to absorb this loss given that the sum we anticipate losing in 2016 equates to our bailiffs full time salaries. These bailiffs will be some of the first direct casualties of this proposed change in policy.
4. **Volunteers unwilling to fill the gap**
Discussions with our volunteers are quite clear if 100% catch and release is introduced leading to the loss in our full time bailiffs, they will not be filling the gap and the system will effectively not be policed.
5. **Poaching escalates out of control**
With the introduction of 100% catch and release the societal contract between local anglers and the Association will fail. There is a strong expectation that some of those anglers who remain will ignore the legislation given the lack of any meaningful deterrence. There is also a real danger that more industrial forms of poaching will pick up, particularly on the estuary and once again on the River Leven given the absence of Bailiffing cover. Poaching will escalate out of control with no evidence that Police Scotland will be able to fill the gap in any meaningful way.
6. **Collapse in fish numbers**
With poachers now able to target stock both in the estuary and in freshwater with little prospect of being detected fish stocks will be massively depleted in year 1. Reported fish catches will now be sharply down on the previous years for both salmon and sea trout due to the double impact of poaching and a fall in member numbers. Upper Clyde rivers will also suffer through a lack of estuarine protection and will see noticeable falls in fish numbers. Loch Lomond’s iconic pike will also be in trouble with indiscriminate exploitation of pike stocks by individuals seeking to harvest these fish for food against current bye laws.

**2017**

1. **Further reduction in membership numbers**The spectre of unrestricted poaching will lead to many anglers failing to renew their memberships in 2017 and seeking fishing opportunities elsewhere. It is hard to say how many members will remain it is in all likelihood not going to be more than 25% of current levels.
2. **Further fall in income**A further reduction in membership will again hit the Association leading to a further fall in income, potentially of the order of a further 50%, annual income will therefore be down to around £26,000, barely enough to pay our current leases. The possible formation of an FMO in 2017 will lead to the introduction of a levy which will cost the club thousands of pounds per annum with the prospect of the club failing to balance its accounts at the end of the 2017 financial year. This will necessitate the club raising membership fees which will lead to more anglers walking away as has been seen elsewhere in Scotland.
3. **Unable to pay leases**In an effort to balance the books certain leases will be dispensed with. This will lead to a further erosion in membership numbers and will have an impact on landowners with whom we have good working relationships.

**2018**

In February 2018 the current chairman of the LLAIA will stand down as it is the end of his term in office. Given the scenario painted above it is highly unlikely that anyone will come forward to take up the chair of the club, effectively leading to the Association being wound down. All assets will be sold and it has been proposed that the constitution should be amended to allow the club to use any remaining monies to seek for its remaining members, through the courts, financial compensation from the government.

**Projected Financial cost**

1. Year 1, 2016 – 50% fall in income from £110,000 to £55,000
2. Year 2, 2017 – Further 50% fall in income £55,000 to £27,000
3. Year 3, 2018 – Club no longer exists as we know it.

**Summary and Conclusion**

The aims of the Wild Fishery Review are to:

* develop and promote a modern, evidence-based management system for wild fisheries fit for purpose in the 21st century, and capable of responding to the changing environment
* to manage, conserve and develop our wild fisheries to maximise the sustainable benefit of Scotland’s wild fish resources to the country as a whole and particularly to rural areas

The LLAIA and LLFT support the concept of restricting the killing of wild salmon in Scotland and particularly welcome the proposal to prohibit the taking of Atlantic salmon out-with inland waters. We also support the development of conservation plans; these are important across Scotland and we would like to see a requirement that this is extended to all systems.

Unfortunately, the impact the current proposals as they currently stand aligned to our grading will, as has been evidenced above, do the exact opposite for the Loch Lomond and River Endrick SAC salmon and sea trout fisheries. They will also have a massive detrimental impact on the Lomond coarse fishery where our bailiffs are actively targeting individuals who wish to kill large numbers of coarse fish, particularly pike for which the Loch is so famous.

Simply put the LLAIA Committee believe that the imposition of a catch-and-release only order on the Lomond system will lead to the collapse of the Association within 3 years. It will also lead to a collapse in fish stocks and given that work by Professor Colin Adams of the University of Glasgow has shown that the Lomond system has potentially one of the most diverse genetic Atlantic salmon populations in the world, this will be a scientific disaster.

We believe that it is almost inevitable that the decision to impose catch-and-release only order on our fishery, based on insufficient and quite frankly questionable data, will decimate not only our system but will have a negative impact on other systems reliant on the Clyde estuary for stock migration due to the impact of increased poaching activity .

We are particularly disappointed at the lack of consultation between Marine Scotland scientists and our Association and the Loch Lomond Fisheries Trust when it came to determining the health of our system. Quite frankly to use high level catch data without considering angling pressure or the latest survey results is both flawed and inexcusable and would in our opinion never pass an objective peer review test. We are further disappointed that Marine Scotland have not engaged with us while we were preparing our response despite reassurances being given that they would.

However, it is not just the impact on the Association that concerns us. We are a responsible body who appreciate that we provide more than low cost salmon angling opportunities to our members and day ticket holders. We are a key environmental guardian of the Lomond system who have over the last 4 years been actively engaged with SEPA and Scottish water to help maintain and enhance the environment in and around our fishery. Our bailiffs and members have reported numerous pollution incidents over the years providing a real tangible benefit to our local communities.

As noted above the fishery also helps generate income within the local economy. In total we spend in the region of £100,000 per annum locally, either directly through employing 2 full time bailiffs or the purchase of goods and services related to our bailiffing and fishery activities e.g. transport and fuel, bankside maintenance materials and fishing leases. Our active fishery also attracts indirect income to the area in the form of fishing tackle sales, food sales and accommodation provision for visiting anglers. We believe that angling in the area might generate at least another £50,000 per annum for the local economy. We further believe there is real room for development here and have plans to enhance the fishery to make it a more desirable venue for visiting anglers.

Finally the most important benefit we bring is to our members, many of whom have been fishing the system since childhood. If fish stocks and the Association were to collapse as predicted some anglers would invariably seek their fishing elsewhere. For many, however, who are on low incomes, rely on state benefits or pension this will not be an option and they will no longer be able to afford salmon fishing, many will drop out of fishing all together. As indicated in the preamble fishing is good for people, particularly as you get older. The impact of these proposals will be to negatively impact on the health of a large number of our members, not only physically but mentally as well, given the degree of loss that they will experience. This is perhaps the most sobering, albeit hidden impact of these proposals, the impact on individuals, particularly those in lower income brackets who quite frankly have nowhere else to go.

Given the impact on our members and in particular the disproportionate impact it will have on those who are elderly and registered disabled, all protected characteristics under equalities legislation, we will be writing to the minister to demand that a formal equality impact assessment is undertaken with regards to these proposals. We shall also be writing to various representative groups for the elderly and disabled to seek their support in our efforts to have these proposals considered properly from an EIA perspective as we believe that these proposals are a direct threat to not only the most vulnerable groups in our society but also to community wellbeing in general.

**Conclusion**

The members of the LLAIA ask for an urgent review of the grade 3 banding for the Lomond system and the Endrick SAC on the basis of the evidence led above through, either:

* Reclassifying the Lomond System and Endrick River SAC to be a Category 2 system, or
* 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.

For and on behalf of the Committee and members of the LLAIA

**References**

* <http://www.resources.anglingresearch.org.uk/sites/resources.anglingresearch.org.uk/files/Substance_AnglingReport_Section1_Sport.pdf>
* Loch Lomond Angling Improvement Association: catch and membership data 2000 – 2014
* Loch Lomond Fisheries Trust: juvenile population survey data summer 2015 (unpublished)
* Loch Lomond Fisheries Trust: salmon redd counts on River Leven 2012 – 2014 (unpublished)
* Loch Lomond Angling Improvement Association: salmon redd counts on River Endrick 2010 – 2014 (unpublished but furnished to Marine Scotland)
* Loch Lomond Angling Improvement Association: membership and financial data 2014
* Loch Lomond Fisheries Trust: Fisheries Management Plan 2009-2013 (<http://www.lochlomondangling.com/PDF/LLFT_FMP.pdf>)

**Individual responses to new proposals in line with comments above:**

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

**Agree**

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

**Disagree**

*The LLAIA 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.*

*We 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**

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

1. 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**

*The areas requiring conservation plans should not be limited. Conservation plans should be in place for all systems in Scotland*