

Salmon fishing: proposed river gradings for 2024 season Consultation outcome report

December 2023

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Consultation outcome report

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1. Background

1.1 River gradings

Since 2016 annual stock assessments have informed the Conservation of Salmon Regulations, which aim to protect wild Atlantic salmon populations in rivers where they are most at risk. This is achieved through annually assessing the conservation status of Atlantic salmon stocks across 173 separate inland water assessment areas. These assessments are then used to inform the proposed river gradings for each of these areas in the upcoming salmon fishing season. The Scottish Government seeks views on these proposals annually through public consultation.

The conservation status of each stock is defined by the probability of the stock meeting its conservation limit (CL) over a five-year period. Stocks are allocated to one of three grades, each with its own recommended management actions:

Category 1

At least 80% probability of meeting the CL. Exploitation is sustainable, therefore no additional management action is currently required. This recognises the effectiveness of existing non-statutory local management interventions.

Category 2

Between 60-80% probability of meeting the CL. Management action is necessary to reduce exploitation. Catch and release should be promoted strongly in the first instance. The need for mandatory catch and release will be reviewed annually.

Category 3

Less than 60% probability of meeting the CL. Exploitation is unsustainable therefore management action, including mandatory catch and release (for all methods), is required to reduce exploitation.

In the proposed river gradings for the 2024 season, 112 out of 173 stocks have been assessed to be in poor conservation status. 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](#) has been provided by Marine Directorate for the purposes of this consultation.

More [information on the conservation of salmon](#) can be found on the Scottish Government website.

2. Consultation

2.1 Purpose and process

We sought views on the proposed river gradings for the 2024 salmon fishing season. The consultation opened on 9 August 2023 and closed on 8 September 2023. [Information in support of the consultation](#) was provided online and responses to the consultation could be submitted on [Citizen Space](#), by email or post.

The [consultation questionnaire](#) contained eight questions which covered the proposed river gradings for the 2024 salmon fishing season, and any impact the proposed changes may have on respondents. Respondents were able to answer as many or as few questions as they wished.

In the following analysis, the number of respondents who held a specific view is given as a percentage of the total number (37) of respondents to the consultation unless otherwise specified.

3. Consultation analysis

3.1 Respondents and their interests

There were 37 responses submitted to the consultation which consisted of those from individuals (46%) and organisations (54%). A range of organisations submitted responses to the consultation including six District Salmon Fishery Boards, the River Tweed Commission, five river or fisheries trusts, three angling clubs or associations, three organisations with national membership such as Angling Scotland and Fisheries Management Scotland and two other businesses.

A majority of respondents (57%) indicated that they had an interest in the river grading assessments for the whole of Scotland, although 68% of respondents expressed an interest in specific freshwater systems. More than 26 rivers, lochs and geographical regions across Scotland were indicated to be of interest to the respondents of this consultation.

3.2 Views of consultation respondents on the proposed river gradings

A small proportion of respondents (14%) agreed with the proposed gradings for the 2024 salmon fishing season, 41% objected and the remainder did not express a specific view for or against the gradings.

A number of respondents (35%) indicated that they believed the proposed grade assigned to a specific river was incorrect and should be changed. These were broadly split into those who felt one or more river grade should be decreased (19%); and those who felt one or more river grade should be increased (16%). In this context a decrease in grade would have been a call for a grade 1 to be reassessed as a grade 2 or for a grade 2 to be reassessed as grade 3. For a requested increase in grade this could have been a request for a grade 3 to be reassessed as grade 2 or a grade 2 to be reassessed as grade 1.

A quarter of respondents (27%) made a plea for a mandatory catch and release regime to cover all of Scotland, 30% of those that suggested this had also asked for a decrease in one or more river gradings. A third of respondents (32%) raised concerns over the methodology used to calculate the conservation status of rivers.

Prominent issues raised included:

- requests for fish counter data to be used in addition to rod catch data in the assessment of river conservation statuses (27%)
- concern that the gradings do not accurately reflect the status of spring fish (24%)
- that rod effort on rivers should be considered in the assessment method (22%)
- concerns of missing catch data due to lower catch rates and/or individuals not submitting their catch return forms on time or at all (22%)
- additional data such as those from the National Electrofishing Programme for Scotland (NEPS) should be included in the assessment model (14%)
- environmental conditions such as low water levels reduced the number of catches or that flow data should be used within the assessment model (11%)

Only one response provided additional substantive evidence that requires further review.

3.3 Views expressed on impacts of the proposed gradings on respondents

Over a third (38%) of respondents expressed concerns that they or their business would be financially or otherwise impacted due to the proposed river gradings. This was equally expressed by those that identified themselves as organisations and individuals. The impacts raised were broadly defined under two main themes, income related concerns and angler related concerns.

Prominent issues raised across these themes included that the proposed gradings would:

- have a wider economic impact on rural communities (46%)
- result in reduced income for businesses directly or indirectly associated with angling (41%)
- deter anglers from the sport and reduce tourism, which respondents were also concerned would lead to decreased angler presence on rivers (41%)
- result in areas being seen as not attractive to anglers as there is a perceived poor chance of catching salmon (30%)

3.4 Views expressed on other actions to protect and restore wild salmon populations

A majority of respondents expressed views demanding urgent actions taken on other pressures that they felt needed to be taken now in order to better protect salmon populations.

There were a number of pressures on wild salmon populations identified by respondents, these have been ranked by the percentage of total respondents who mentioned that pressure:

- predation (41%)
- habitat degradation including issues associated with river barriers (27%)
- aquaculture activities (24%)
- low water quality and pollution (24%)
- pressures in the marine environment (22%)
- low water flows and abstraction (19%)
- climate change (16%)

Furthermore, a number of actions were suggested by respondents to help protect and recover wild salmon populations. These are ranked by the percentage of the total respondents who mentioned these actions:

- taking an ecosystem wide approach to protect and preserve the wider environment (57%)
- stocking (30%)
- preventing illegal fish poaching (11%)
- close rivers to angling for set periods of time through adjusting angling season times (11%)

Finally, respondents were asked what further information they would have liked us to provide so that they could make an informed response to the proposed river grading consultation. This highlighted that 43% of respondents wanted a specific plan to address the decline of wild salmon, and/or had indicated that knowing how the proposed river grading consultation connects with other Scottish Government policies would be useful.

4. Summary

There were 37 respondents to the consultation who had interests in rivers and freshwater systems across Scotland, including from regional and national fisheries management organisations. A small proportion of respondents (14%) agreed with the proposed river gradings for the 2023 salmon fishing season while 41% objected to them. Many of those who rejected the river gradings appeared to do so due to their views on the assessment method, or their concern that rivers of interest to them were incorrectly graded.

A majority of respondents expressed views demanding urgent actions taken on other pressures that they felt needed to be taken now in order to better protect salmon populations. Additionally, 27% of respondents indicated that they felt a 100% catch and release policy would be more effective in protecting and restoring wild salmon populations.

Several potential impacts of the proposed river gradings were raised by respondents including deterring anglers from the sport, the economic impact on businesses that

benefit from angling and reduced contributions from anglers to conservation and habitat restoration projects through their decreased river presence.

5. Scottish Government response

5.1 Response to respondents' views on the proposed river gradings for the 2024 salmon fishing season

To protect vulnerable spring sub-stocks, statutory conservation measures were introduced in 2015 to ensure that no salmon is taken in Scotland before 1 April each year. This is achieved through [The Conservation of Salmon \(Annual Close Time and Catch and Release\) \(Scotland\) Regulations 2014](#) and [The Tweed Regulation Amendment Order 2015](#).

In 2016 the spring measures were supplemented by the [Conservation of Salmon \(Scotland\) Regulations 2016](#). Under these regulations, the killing of Atlantic salmon in inland waters during the rest of the year is managed on an annual basis by categorising the conservation status of their stocks.

The views given on the proposed river gradings have been used to inform the process of finalising the gradings for the 2024 salmon fishing season. These will be used in the annual amendment to [The Conservation of Salmon \(Scotland\) Regulations 2016](#) that regulates:

- permission for the killing of salmon in inland waters where stocks are above a defined conservation limit, such as category 1 or 2 rivers; and
- the mandatory catch and release of salmon in areas which are below their defined conservation limit, those assigned category 3 status.

Respondents who commented that the proposed grade for a specific river was incorrect and provided evidence for a change of grade, were contacted to discuss these matters further. Once a review of the evidence provided has been completed, the regulations will be brought forward for amendment subject to parliamentary approval. After this process has concluded, the finalised river gradings will be published on the [Scottish Government website](#).

A number of issues were raised by respondents on the assessment methods used to assess the status of stocks and assign the proposed river gradings. The methodology used is the best currently available, is aligned with international best practice and has been developed over a number of years by Marine Directorate (formerly Marine Scotland). The basic methodology is the same as previous years.

Marine Directorate is continuing to improve the data used in the modelling by, for example, supporting counter developments. The stock assessment methods themselves are also being updated to incorporate additional information, notably the impact of fishing effort on catches. However, rod fisheries have only collected effort data since 2019, and more time is required in order to produce and consult on these new methods.

5.2 Views provided on impacts of the proposed gradings on respondents

All rivers that are Grade 3, and as such have a less than 60% chance of meeting their conservation limit, are subject to mandatory catch and release through the Conservation of Salmon Regulations. This means that all salmon, regardless of how they are caught, must be returned to the river with least possible harm. This does not stop anyone from taking part in fishing activities, providing they operate within the regulations and local conditions stated on permits or permissions.

We recognise that a number of respondents expressed concerns with their area or areas of interest falling a grade in this years' assessment. The detailed information provided each year as part of the annual assessment and consultation process, highlights which assessment areas may be heading towards lower grades. For those respondents who were concerned about a river decreasing from a Grade 1 to a Grade 2 river, it is important to note that only Grade 3 rivers are subject to mandatory catch and release. The precautionary downgrading of a river or assessment area to Grade 2 does not alter the role of fisheries managers in setting local restrictions in relation to the encouragement of voluntary catch and release of salmon.

Grade 2 was introduced to highlight those areas which were in danger of declining into poor conservation status such that voluntary measures would need to be replaced by mandatory catch and release. It therefore acts as a reminder that local action, such as increased catch and release, habitat restoration etc, is required in order to try and prevent deterioration of the salmon stocks.

5.3 Response to respondents' views on other actions to protect and restore wild salmon populations

The [Wild Salmon Strategy](#) and accompanying [Implementation Plan](#) provide the overarching framework which will guide the actions to be taken by the Scottish Government and other public bodies, together with the business and charitable sectors to further the protection and recovery of Scottish Atlantic wild salmon populations over the next five years from 2023 to 2028. The broad range of actions outlined in the plan will help to reduce the impact of pressures identified by respondents as having an impact on wild salmon populations, such as removing or easing barriers to migration. The Wild Salmon Strategy is one component of the Scottish Government's ambition to protect and restore Scotland's natural environment as outlined in the [Environment Strategy for Scotland](#) and the [Biodiversity strategy to 2045: tackling the nature emergency](#).

The [Wild Salmon Strategy Implementation Plan Delivery Group](#) has been established, bringing together the organisations that will deliver the actions set out in the Implementation Plan. The role of the group is to oversee and direct delivery of the Strategy and Implementation Plan.

We recognise that the fisheries management and angling communities have taken important and significant steps in the past three decades for salmon conservation, including increasing catch and release rates across Scotland and contributing to the creation of guidance for [catch and release best practice](#).



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Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-83521-771-9 (web only)

Published by The Scottish Government, December 2023

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS1395794 (12/23)

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