

Naeem Bhatti  
Wild Fisheries Review

15 July 2014



**Scottish  
Wildlife  
Trust**

## **Wild Fisheries Review – Response to Call for Written Evidence**

The Scottish Wildlife trust welcomes this review and sincerely hopes that it achieves success where other reviews and strategies have failed to usher in the required changes. We have been encouraged by the inclusive and transparent way in which the review has been conducted and from the published monthly bulletins it appears that a good deal of progress has already been made. We look forward to seeing positive outcomes and engaging in future consultation.

The Trust's contribution centres on our belief that wild fisheries management in Scotland should follow the principles of an ecosystems approach and also makes recommendations on two areas where action is needed to achieve sustainable fisheries.

### *Future Management*

We understand that the Review Panel is likely to recommend a decentralised model of delivery involving a network of fisheries management organisations supported by a national commissioner. While we have no specific comment on this proposed structure in itself, we would urge that the new organisations have a clear overall objective to protect and enhance Scotland's natural capital and to end its depletion. The new structures must also nest within a system of integrated catchment management that uses and promotes the ecosystems approach.

We would be greatly concerned if there was a continuation of the bias in some areas towards towards *salmon* rather than towards the conservation of all species of fish and the overall health of aquatic ecosystems. While we recognise the importance of salmon as a resource and a symbol of Scotland's natural heritage, future management must ensure that other species (including the allis shad, twaite shad, arctic charr and vendace, brook, sea and river lamprey, European eel) are given considerably more research and conservation effort than they are afforded at present.

Under an ecosystems approach no one component of the system should be treated in isolation from any other component. By taking a joined up perspective, it is possible to develop a much more strategic approach to tackling the systemic threats to biodiversity and prioritise the use of resources at the appropriate scale. It is also an approach which over time should encourage synergies rather than conflicts between social, economic and environmental objectives.

**Patron** HRH Prince Charles, Duke of Rothesay **Chairman** Allan Bantick **Chief Executive** Jonathan Hughes

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Such an approach is already supported by the Scottish Government and is promoted through the Land Use Strategy and the 2020 Challenge for Scotland's Biodiversity. The latter being Scotland's response to the Aichi targets set by the United Nations Convention on Biological Diversity. The Review panel should consider how a new fisheries management system will compliment the 2020 Challenge and help to achieve the Aichi goals and targets, particularly Aichi Target 6 – *“By 2020 all fish and invertebrate stocks and aquatic plants are managed and harvested sustainably, legally and applying an ecosystem based approach, so that overfishing is avoided, recovery plans are in place for all depleted species, fisheries have no significant adverse impacts on threatened species and vulnerable ecosystems and the impacts of fisheries on stocks, species and ecosystems are within safe ecological limits.”*

While it has been clearly communicated that the review seeks to be forward looking we would like to highlight the work of the 'Angling for Change' partnership, which brought together anglers, fishery proprietors, and fish conservation interests to consider the needs of fresh water fish and fisheries in Scotland and develop proposals for the future. Although formulated almost 15 years ago, many of the group's proposals ring true today given that in the intervening years minimal change has been achieved despite many good intentions. Although the Review Panel will no doubt be familiar with this work it is worth restating the groups' requirements of a modern fisheries management regime:

- appropriate conservation for all fish species, regardless of their commercial or sporting interest
- a scientifically-based approach to fishery management which seeks to achieve the sustainable exploitation of fish as a sporting resource and maintain the biodiversity of fresh water habitats
- well-publicised and readily available access for angling at reasonable cost in as wide a range of waters as possible, making adequate provision to meet the demand for angling of all types and fulfil the needs of both local and visiting anglers
- recognition for the full diversity of sporting species available and the elimination of restrictions which prevent the use of methods legitimate for pursuing particular species
- mechanisms to gather and disseminate accurate up-to-date scientific information on fish populations and other related issues
- control and monitoring of the movement, introduction and reduction of stocks of fish, invertebrates and aquatic plants

They further recognised that in designing appropriate management structures it would be import to:

- ensure that where possible decisions are taken at a local level by those with an interest in the fisheries concerned and in the protection of local, rare or vulnerable species
- build on the strengths of the effective and well-established structures which currently exist in some areas, and promote the spread of best practice to all areas
- provide sufficient flexibility to accommodate the diverse interests in different areas in a manner best suited to their needs, and give scope for relationships to develop among the parties and for local structures to evolve over time
- operate cost-effectively, harnessing and maintaining the voluntary effort currently invested in fish conservation and fishery management by individuals, clubs and other organisations

### Mixed Stock Fisheries

Addressing the issue of Mixed Stock Fisheries (MSFs) is critical to achieving sustainable salmonid fisheries in Scotland. ICES advice for 2013-2016 states that on the basis of the Maximum Sustainable Yield approach, “fishing should only take place on salmon from rivers where stocks have been shown to be at full reproductive capacity. Furthermore, because of the different status of individual stocks within stock complexes, mixed-stock fisheries present particular threats. The management of a fishery should ideally be based upon the individual status of all stocks exploited in the fishery.”

In line with this advice, NASCO guidelines for the management of salmon fisheries stipulate that management measures should be aimed at maintaining all stocks above their conservation limits by the use of management targets. It is not possible to make an assessment of the impact of coastal netting on individual stocks (including those within SACs) until the components of the fisheries are characterised. Genetic analysis to determine the origins of salmonids caught in coastal netting in NE England established that beach nets (T&J) are MSFs (with a high proportion of catches originated from Scottish rivers). This informed the decision taken by Defra to add these methods to an existing phase out of coastal drift netting.

Without a clear strategy Scotland is becoming internationally isolated in its management of MSFs and we urge that a clear effort is made to address the issue based on the precautionary principle. It would be most welcome if the Review Panel encouraged the formulation of a strategy for MSFs in Scotland as was recommended by the Report of the Scottish Mixed Stock Salmon Fisheries Working Group.

### Carcass Tagging

With powers now available under the Aquaculture and Fisheries (Scotland) Act 2013 we reiterate our call made during parliamentary scrutiny for the introduction of a statutory system of carcass tagging with individually numbered tags, recorded in a logbook. Without individually numbered and recorded tags any new measure would fail in its aim to close the market for illegally captured fish and improve the quality of catch data, in turn aiding stock assessment and the conservation of salmon and sea trout.

A byelaw introduced in England & Wales in 2009 requires all net-caught salmon and sea trout to be individually tagged and for the details to be recorded, along with the tag number, in a logbook. This was designed to reduce illegal exploitation and to improve the accuracy of declared net catches in compliance with international obligations to reduce the levels of illegal and unreported catch. A review of the first year of operation conducted by the Environment Agency found overall support for the measures from the net fishing industry.

An effective scheme would also have wider species conservation benefits. Salmon poachers have been known to use monofilament gill nets, which are illegal in Scotland and can trap sea birds and marine mammals, either while the nets are active or after being abandoned.

We welcome the acknowledgement (as communicated in the review's June bulletin) that the Panel considers that a mechanism to control the number of fish killed is required where there is a conservation threat and that individually numbered tags will have a role. We request that this is followed up by a clear recommendation on a licensing system and carcass tagging in the Review Panel's final report.

### **For further information please contact:**

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### **About the Scottish Wildlife Trust**

For 50 years, the Scottish Wildlife Trust has worked with its members, partners and supporters in pursuit of its vision of healthy, resilient ecosystems supporting expanding communities of native species across Scotland's land, water and seas. With over 35,000 members, several hundred of whom are actively involved in conservation activities, we are proud to say we are now the largest charitable body working for all the wildlife of Scotland. The Trust owns or manages 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.