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## **A response to the consultation on proposed conservation measures to introduce a licensing system for killing wild salmon in Scotland**

### **BACKGROUND**

#### **Introduction**

Founded in 1917, Inverness Angling Club (IAC) leases some three miles of salmon and sea trout fishings on the River Ness from the Inverness Common Good Fund. The fishings provide access to high quality salmon fishing for anglers of moderate means. In 2014 the club's membership stood at 453, including 174 senior (aged 21 to 65), 49 concessionary (aged over 65) and 140 juniors (under 18). Over 30 associate members are drawn from outside the immediate area of Inverness, from the Highlands to Devon and Germany. Visitors come from many parts of Europe to fish our waters. These visitors generate an economic impact estimated at over £30,000 a year for the City of Inverness.

#### **Survival**

In the last five years, senior membership, the category that provides the key element of IAC income, has fallen by 25 per cent. A survey of those who had not renewed gave three key reasons for leaving the club – declining catches, rising membership fees (caused by rising valuation that generated increases in rent and fishery board assessment) and the increasing emphasis on catch and release. While we have managed to persuade The Highland Council to reduce the rent (from £18,000 inclusive of VAT to £11,400 inclusive of VAT) for a period, the fishery board assessment remains the same at £23,250. The existence of the club is under threat, potentially removing the organisation that enables ordinary anglers to access salmon and sea trout fishing at affordable cost.

#### **Angling for Some!**

In a review that aimed to achieve 'Angling for All', the organisations that deliver tuition and angling opportunities to most anglers in Scotland (i.e. angling clubs) were barely mentioned. Yet the proposals being considered are likely to have a potentially catastrophic impact on clubs managing salmon and sea trout fisheries. It will be relatively simple to manage the introduction of these proposals on exclusive and highly priced private beats where ghillies are in day-to-day charge. But some of the recommendations will be difficult, if not impossible, to apply on public beats managed by angling clubs. If the proposals stemming from the review are to be fairly applied, consideration must be given to the special circumstances faced by angling clubs. Otherwise, 'Angling for All' will become 'Angling for Some'.

#### **Conservation**

IAC members have voluntarily increased the release of salmon and grilse from virtually zero to 60 per cent over the last five years. But what will be required if tags are introduced? If the sustainable catch for the IAC fishings is set at 126 (the total catch for 2014), how does the club fairly distribute 126 tags to a membership of over 450? If the large majority does not get tags, the incentive to fish will disappear. This could result in a catastrophic fall in membership, resulting in the demise of the club or creating an exclusive organisation for those who can afford much higher fees. Association waters will become elitist. This cannot be what the Scottish Government wants to see. Again, 'Angling for Some'.

## A response to the consultation by Inverness Angling Club

### Q1

**The Kill Licence:** While recognising the need for conservation, we strongly oppose the proposed kill license. It is a bureaucratic and unnecessary and will place a further financial burden on clubs whose resources are already stretched to the limit. It will put further pressure on clubs to increase fees payable by members and visitors, and put salmon angling beyond the means of many anglers. It could cause an increase in poaching that could swamp a poorly resourced regulatory system.

**Alternatives:** We believe there are alternative methods that would be more sensible and successful. The Scottish Government should stop all interceptory and mixed stock netting around Scotland's coasts. It's a no-brainer – from two points of view. First, economic impact studies estimate the value of salmon and sea trout fisheries at £73 million, a key part of Scotland's tourism industry. Net fisheries are valued at £6.2 million. Such action would have the support of all anglers and achieve international acclaim. Second, it would be sensible from a conservation point of view. Scottish Government figures show that, in 2013, rod catches of salmon and grilse totalled 67,468 with an overall release rate of 80 per cent. Catches by fixed engines and net and coble totalled 24,370 with a release rate of zero per cent. So, anglers killed 13,493 fish while netsmen killed almost twice as many. Anglers are increasing their release rate. Netsmen will continue to kill everything they are allowed to catch. Heritable rights are not an insurmountable obstacle to terminating interceptor and mixed stock netting. The Government is already doing so by changing close times and, in WFR proposals, restricting catches.

### Q2

We do not agree with the introduction of a kill licensing system. Much more could be achieved through the closure of nets. For example, it is estimated that Scottish and Norwegian nets kill 980 out of every 1,000 salmon saved in Faroese waters.

### Q3

The nature of individual rivers determines the equipment used, so a one size fits all approach would be unfair and unworkable. Let local fishery boards decide the nature of equipment used. Their policy is set by a cross section of interests, including fishery scientists and anglers, with detailed knowledge of their river and loch resources.

### Q4

**Tagging:** Carcass tagging should not be part of a bureaucratic kill-licensing scheme. If carcass tagging is deemed essential to meet conservation targets, it should be introduced at fishery board level where decisions can be made on an informed local level. Even so, it seems that the WFR has given no consideration to how a tagging scheme will work. It is simple to introduce this type of measure to exclusive and expensive private beats, where ghillies are in day-to-day charge and can issue tags as required. It is not so simple to apply the measure to a public, club salmon fishery with many different members and visitors fishing from first light to last light over a distance of some three miles. If a number of tags is to be issued to each angler in advance of the salmon season, it could be argued that this would encourage the killing of more fish: "I've been given five tags so I'm allowed to kill five fish." Voluntary codes, such as the releasing of every first or second fish, could be ignored. And everyone would require complete assurance that tags are tamper-proof, i.e. unable to be parted (using hot water) for further use.

**Regulation:** Regulation needs to improve, principally in stamping out poaching by demonstrating that it will not be tolerated, will be pursued firmly by police and prosecutors and will be subject to heavy fines and, for repeated offenders, imprisonment. At times, there appears to be some reluctance by police and fiscals to consider poaching as the serious, damaging and costly problem it is. At present, it is illegal to sell rod caught fish but not to buy rod caught fish. This loophole should be closed immediately to help eliminate the continuing market for wild salmon and grilse. This would greatly assist those who are encouraging a voluntary approach to conservation.

**Q5**

We believe that ample evidence of the negative impacts of these proposals is outlined in the preceding paragraphs.

**Q6**

Before proceeding with the introduction of any measures proposed by the Wild Fisheries Review, the Scottish Government must give serious consideration to the unique problems such measures will create for angling clubs. The WFR and its proposed outcomes, as a result of its unwillingness or inability to understand the importance of clubs to Scotland's angling structure, could eliminate these clubs altogether or transform them into elitist organisations. We do not accept that this is what the Scottish Government wants. It would remove the organisations that bring young people into the sport; that train them in the required skills; that introduce them to the biology of fish, and rivers and lochs; that teach them about health and safety in river and loch environments; and enable them to secure substantial pleasure, exercise and companionship from a healthy outdoor sport.

### **A tagging system – How it might work**

1. The number of tags would be set and issued by local fishery boards, with scientific advice. Base initial tag allocation, i.e. for 2016, the first year, on the average catch per beat over the last five years, the period over which valuations are determined. From then on, use a five-year rolling process of tag allocation, again using scientific guidance.
2. Tags would be numbered and fishery boards would record the numbers issued to individual beats. Ghillies would record and issue tags to individual anglers on private beats. Clubs would record tags on permits at point of issue.
3. Tags would be non-transferable. Lost or stolen tags would not be replaced.
4. In order to manage the distribution of a restricted number of tags, and their return, clubs could make a charge of £10 per tag, refundable if not used and returned along with their annual catch return. Unused tags must be returned to avoid the assumption that they were used, thus falsely increasing catch numbers and pushing up valuations, rent and assessment. Members can choose not to take a tag but would have to release all fish caught.
5. A number of tags would be retained for visitors (first come, first served) who may or may not choose to purchase a tag.