



## Western Isles District Salmon Fisheries Board

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### **WESTERN ISLES DISTRICT SALMON FISHERIES BOARD PRELIMINARY RESPONSE TO THE BAN ON THE KILLING OF WILD SALMON EXCEPT UNDER LICENCE AND ACCOMPANYING CARCASS TAGGING SCHEME**

This response to the Scottish Government Proposals for a ban on the killing of wild salmon except under licence has been prepared on behalf of the Western Isles District Salmon Fisheries Board. However there has been insufficient time to consult all rivers affected by the proposals which raise such significant and multiple issues. Due to the complexity of the situation it is felt that considerably more time is needed to assess the conservation limits of individual rivers and systems. The WIDSFB welcomes any attempt to conserve/enhance salmon stocks in an effort to achieve a sustainable harvest. However the board wishes to outline the following areas of concern.

- The grouping together of rivers within a district is fundamentally flawed. For instance the Creed District comprises not only the River Creed itself but 14 other migratory salmonid catchments. Likewise all rivers on the west coast of Lewis from Shuainebost down to the north of Hamnaway with the exception of the Langavat SAC are grouped together in one assessment. Some of these systems are managed and others unmanaged and some possess catch data whilst others do not. This situation is repeated across other areas of the Outer Hebrides. WIDSFB would like to see all fisheries assessed on their own individual merit before being categorised.
- The methodology is open to question. Catch returns are an unreliable indicator when variables such as angling effort and method combined with weather/water conditions are taken into account. For example the islands experienced what was estimated as reasonable runs of migratory fish in 2014 but due to weather conditions including high pressure, high temperatures and unusually bright days the catches were disappointing. It would seem that 2015 is the opposite with runs estimated to be lower but the same size of catches as in 2014 due to weather conditions more favourable to angling.
- Another area of concern the WIDSFB has relates to compliance with category 3 mandatory catch and release. The Outer Hebrides enjoy a very high number of regular anglers who come to the islands year after year and voluntarily release most if not all the fish they catch. It is feared that if mandatory catch and release was introduced where they fish a proportion would look to fish elsewhere. Many anglers consider themselves as guardians of their very quarry and feel strongly against the removal of self responsibility. This, even if it was say just a 10% reduction in revenue could affect the economic viability of some of the

rivers/systems that are run commercially. It is these rivers, systems and angling clubs that employ ghillies, keepers, and bailiffs. The WIDSFB does not employ bailiffs directly so any loss of angling revenue due to category 3 status could jeopardise the positions of those employed in the running of the rivers and systems. This scenario of less river management and less control on poaching in turn would fundamentally jeopardise the stocks of wild migratory fish.

- The WIDSFB would like to draw attention to the high levels of fish returned ranging from 100% to 60% with an average of probably around 80% in the Outer Hebrides. Would the return of that remaining 20% have any significant effect on stocks? Perhaps there is a case for an additional category so that only the really endangered rivers have enforced 100% catch and release.
- There is insufficient scientific evidence on most rivers regarding their level of wild stocks but of the surveys that have been carried out in the Outer Hebrides over the last ten years or so nearly all have pointed to reasonably healthy to healthy wild stocks. Unless a river can be shown to have a worryingly low wild stock it is surely inappropriate to put it straight into the currently proposed category 3. Much more survey work should be undertaken, assuming there is the necessary funding available.
- Should a river have mandatory catch and release imposed from the beginning whilst any aquaculture takes place in the estuarial waters relating to that river then surely appropriate restrictions/conditions should be imposed on that aquaculture activity if that has not already occurred.

WIDSFB  
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