

20 January 2025

Dear Rural Affairs and Islands Committee members,

**Conservation of Salmon (Miscellaneous Amendment) (Scotland) Regulations 2024 (SSI 2024/368)**

Fisheries Management Scotland (FMS) is the membership organisation for Scotland's District Salmon Fishery Boards, the River Tweed Commission, and Rivers and Fisheries Trusts who are dedicated to the conservation of salmon and freshwater fish and the protection and enhancement of fisheries.

I am writing to express our concern that Motion S6M-16130 has been laid in the Scottish Parliament - *That the Rural Affairs and Islands Committee recommends that the Conservation of Salmon (Miscellaneous Amendment) (Scotland) Regulations 2024 (SSI 2024/368) be annulled.*

Scotland's wild salmon crisis is now widely understood and recognised, and in December 2023 the IUCN reclassified Atlantic salmon in GB as endangered. Conservation and restoration of Atlantic salmon populations has never been more vital. The Conservation of Salmon (Miscellaneous Amendment) (Scotland) Regulations 2024 are an important part of Scotland's approach to protecting wild Atlantic salmon through prohibiting the retention of fish where necessary for the conservation of salmon.

The proposed instrument has two purposes.

The instrument will amend the Conservation of Salmon (Scotland) Regulations 2016 to amend the areas of inland waters where there is a prohibition on the retention of any salmon caught in order to "reflect the most recent stock assessment for the 2025 salmon fishing season".

If the motion to annul these regulations was successful, we believe that it sends entirely the wrong message about the Scottish Parliament's desire to protect this iconic species. Whilst conservation measures would continue to be in place, a number of rivers which have moved from Grade 2 to Grade 3 under the most recent assessment would not have the protection provided by these regulations.

The instrument will also amend the Conservation of Salmon (Annual Close Time and Catch and Release) (Scotland) Regulations 2014 which define the timeframes for which salmon can be caught and the annual close times for salmon fishery districts. The instrument would add "25 February to 31 March" to the Annan Salmon Fishery District schedule in order to "reinstate the Annan early rod season, permitting fishing by rod and line where retaining salmon is prohibited".

By way of further context, all rivers in Scotland have periods at the start and end of the season, where fishing by rod and line is permitted *during* the annual close time. These are set out for each river in the schedule of the [Conservation of Salmon \(Annual Close Time and Catch and Release\) \(Scotland\) Regulations 2014](#). The schedule means the following:

1. It is illegal to retain salmon for all rivers in Scotland until 31<sup>st</sup> March.
2. The River Annan is one of only two rivers in Schedule 1 in which there is not a set period in the early part of the year (during the annual close time) in which fishing by rod and line is permitted. The other is the Eachaig, which traditionally opens on the 1<sup>st</sup> April and therefore was not covered by the regulations. In the case of the Annan, the start of the rod and line

season has always been 25 February. It was only the fact that local conservation regulations (which required 100% catch and release on the Annan) were already in place in 2014, that meant that the Annan was not fully covered in the schedule of the 2014 Regulations.

If the instrument is annulled, this would mean that the fishery on the River Annan would not be permitted to operate between 25 February and 31 March. This would have a significant impact on the local economy. The amendment is necessary to maintain the position that was previously in place through time-limited local conservation regulations requested by the Annan DSFB.

Fisheries Management Scotland therefore does not support the motion to annul.

Yours sincerely

Dr Alan Wells

CEO | Fisheries Management Scotland