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Animal Concern Advice Line (ACAL) is a recognised Scottish charity: No. SC030982.

Animal Concern Advice Line was established in 2001 to take on the charitable work of Animal Concern which was founded as the Scottish Anti-Vivisection Society in 1876.

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I hope it is not too late to make a submission (7.30pm on 29/9/16) but Animal Concern Advice Line would like to offer a little bit of advice on the subject of salmon conservation.

This conservation project is very much based on numbers and statistics with the emphasis on making it a nice, clean scientifically sound exercise. However I am concerned that by turning it into such a study some practical, common sense measures to protect salmon stocks may have been put on the back burner or ignored completely.

The thrust of the exercise targets anglers, mainly by designating certain river systems as total catch and release areas in a bid to increase the number of fish reaching their spawning grounds. It will be interesting to see if catch returns in those compulsory catch and return systems make a sudden increase this year thus allowing anglers to kill one or two fish for the pot next year.

Had this legislation not been rushed through in an attempt to finally meet our obligation to conserve Atlantic Salmon stocks it might have been better thought out. Indeed had politicians acted decades ago on issues such as plundering of salmon stocks by estuary netting stations and the damage caused to wild salmon by allowing floating factory salmon farms to proliferate on migratory salmonid routes, the crisis may not have arisen.

I suggest that more priority be given to dealing with the problems of sealice on salmon farms before any increase achieved in smolt numbers migrate to sea, running the gauntlet of long lethal lines of lice infested salmon cages.

I suggest that instead of taking advice from salmon netters convicted of criminally breaching salmon conservation legislation the Government takes the advice offered by myself and many others and ban all estuary netting of salmon and seatrout.

I suggest that instead of forcing anglers to cruelly return badly injured fish to suffer a slow death in the water the Government allows the killing of badly injured fish and quickly acts to outlaw terminal tackle most likely to damage fish and prove hazardous to other wildlife if lost. In stew pond put and take commercial fisheries anglers fishing on a catch and release basis are restricted to using hooks that will minimise damage to fish. Bait fishers have to use larger, barbless hooks with rounded shanks which fish are less likely to swallow and which can be removed quickly without damage. Fly fishermen must use single, barbless hooks which avoid hook injuries and reduce handling time thus giving fish a much greater chance of survival when returned to the water.

Salmon anglers on some compulsory catch and return systems can use lures with two or three sets of barbed hooks which can cause great damage to the mouths, gills and eyes of salmon. It is inhumane to return badly injured fish to the water. Injured fish are also at increased risk of infections which may spread to healthy fish.

Instead of having a patchwork of rules governing tackle across different fishery boards the Government should have introduced laws restricting the type of tackle that can be used in all Scottish waters so that fish that are caught and released have a much increased chance of survival. This should be made a priority.

I suggest once again that the Scottish Government take a holistic approach to fish conservation and protection by introducing a national anglers licence scheme requiring anglers to meet certain standards to minimise suffering to fish, improve fish conservation by limiting the number of fish which can be killed and forcing the large minority of anglers who cause avoidable damage to wildlife and the environment to clean up their act. Two weeks ago I visited a sea loch in Argyll to look for a reported casualty seal and in an area of less than 100 square metres I picked up several tens of metres lengths of tangled fishing line containing in total seven very sharp hooks. Lethal to wildlife this material had not been accidentally lost but deliberately discarded along with plastic packaging for fishing gear and various cans and bottles.

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