Written submission from Andrew Graham-Stewart

I have taken a close interest in, researched and written extensively about Scotland’s salmon netting industry for the last 20 years.

The provision within the Bill for an enabling power for Scottish Ministers to introduce a statutory carcass tagging system by regulations is welcome. Whether this is delivered via primary or secondary legislation, I believe that it is vital that it incorporates individually numbered and recorded tags in line with other parts of the UK.

Such a system is imperative if some anomalies associated with the netting industry are to be addressed (carcass tagging without numbers is no more than a marketing exercise):

1) Under-reporting of catches is widespread in the netting industry. This is exemplified in microcosm by the fact that the official catches (published by Scottish Government) show that the declared net and coble catch for the Cromarty Firth was four salmon and 56 grilse in 2010 and eight salmon and 13 grilse in 2011. In both these years four netting stations, each with crews of three or more, were operating in the firth; in 2011 the average catch per station was just two salmon and three grilse – a pitiful return of half a fish per week for what is for some of them the best part of two months work. On the face of it the nets would appear to run at a considerable loss and yet year after year they continue to ply their trade. This situation is mirrored in other locations.

So far as I am aware there has never ever (since the system of catch returns was introduced in 1952) been a prosecution for falsifying a catch return. The authorities (notably FRS and their successors Marine Scotland) are strangely reluctant to investigate the discrepancies between netting effort (including labour costs) and the income from sales of the declared catch.

Carcass tagging with individual numbers would ensure far more accurate catch returns to Marine Scotland.

2) Carcass tagging with individual numbers will also help to curtail the laundering of fish from England, Wales and Ireland, all of which now operate numbered carcass tagging schemes. In particular there is a problem with spring salmon taken in English nets (which are permitted to kill sea trout but not salmon prior to June 1) being moved to and laundered through Scotland.

3) In addition numbered carcass tagging will make it much more difficult for illegally caught fish (poached in either the marine or freshwater) to find a ready market. This is an absolutely key conservation point. Poaching (a form of wildlife crime) will no longer be such an attractive proposition, given that the only way of procuring tags will be through a legal netting station. Furthermore procurators generally view existing salmon law as too complicated and difficult to achieve convictions on. Carcass tagging will simplify matters. If salmon or sea trout were being sold without a numbered tag, then there is no argument that an offence is being committed.
Usan Salmon submission (as published online by the RACCE Committee)

I note that Usan is advocating that responsibility for policing coastal netting stations be moved from Fishery Boards to the “Inshore Fisheries Team”. Leaving aside whether the latter would have the capacity to take on this responsibility, this proposal makes no sense as, in contrast to other fish stocks in inshore waters, salmon and sea trout migrate from and to freshwater and to separate the management of these species in freshwater from that in coastal waters is both naïve and contrary to the best conservation principles.

One can only assume that Usan are seeking to prevent scrutiny by Fishery Boards of what appears to be systematic breaches, at all three coastal districts in which the company currently operates, of the regulations (introduced for conservation reasons) requiring operators of fixed engine nets to lift the leaders (in other words – not be fishing) during the weekend close time between 6 pm on Fridays and 6 am on Mondays.

With Usan, failure to lift the leader at weekends often appears to be the norm rather than the exception. I am not aware of any evidence that coastal sea conditions have deteriorated significantly in the summer months in the last few years. Futhermore it could be argued that Usan should invest in boats that are fit for purpose and able to cope with adverse weather, thus enabling them to operate in line with the regulations.

Aquaculture

With reference to the aquaculture sections of the Bill, I fully endorse the submissions of the Salmon and Trout Association and the Association of Salmon Fishery Boards.