

supported by the Fisheries Management Scotland (FMS) and Fish Legal



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## Acronyms and Abbreviations

CAR..... Controlled Activities Regulations  
BS ..... Bakkafrost Scotland (formerly The Scottish Salmon Company)  
CL..... Conservation Limit  
DPEA ... Scottish Government – Planning and Environmental Appeals Division  
DSFB.... District Salmon Fishery Board  
EMP .... Environmental Management Plan  
FMO..... Fisheries Management Organisation  
IFM..... Institute of Fisheries Management  
INNS..... Invasive Non-Native Species  
MPA ..... Marine Protected Area  
Mowi.... Mowi Scotland  
MSS..... Marine Scotland Science  
MSW.... Multi Sea Winter  
NASCO.. North Atlantic Salmon Conservation Organisation  
PAW..... Partnership Against Wildlife Crime  
SAC..... Special Area of Conservation  
SEPA.... Scottish Environment Protection Agency  
SNH..... Scottish Natural Heritage  
SSSI..... Site of Special Scientific Interest  
THC..... The Highland Council  
WFR..... Wild Fisheries Reform  
WRFT ... Wester Ross Fisheries Trust

## **The Board's Role**

The Wester Ross Area Salmon Fisheries Board (WRASFB) is a DSFB and as such is the statutory body responsible for the protection and enhancement of salmon and sea trout fisheries in its designated area. It was constituted under the Salmon and Freshwater Fisheries (Consolidation) (Act) Scotland 2003. Salmon fishing rights are private heritable titles that are registered separately from land and as such can be bought or sold like any other property.

DSFBs finance their work by applying a levy on the salmon fishery proprietors as directed under the 2003 Act. The 2003 Act states that "a district Board shall have the power to impose an assessment, to be known as the fishery assessment, on each salmon fishery in their district. The fishery assessment is assessed at such uniform rate as is determined for all fisheries in the district by the Board and shall be levied according to the valuation of a fishery as entered into the valuation role". A DSFB may do such acts, execute such works and incur such expenses as may appear expedient for the protection or improvement of the fisheries within their district; the increase of salmon (and sea trout); or the stocking of the waters of the district with salmon (and sea trout).

Elected members from amongst those salmon fishery proprietors form the core membership of the Board with representatives of salmon anglers and tenant netsmen being co-opted onto the Board as may be appropriate.

## **Board Members**

Board members are elected triennially, and the last election took place on 7 December 2021. The elected members and co-opted Board members then elected one of their number as Convener after the election of the co-opted members to the Board. The current Board members are:

### **Upper Proprietors**

Stephen Bate .....	Convener (River Balgy east bank)
Donald Rice.....	Mandatory for Regina Anna Properties (Dundonnell)
Rosie Nichol.....	Mandatory for Pat Wilson (Kinlochewe)
Gordon Crawford.....	Mandatory for Nicholas Crawford (Eilean Darrach)
Phillipa Cliff.....	Mandatory for Philip Smith (Coulin)
Stuart Allison .....	Mandatory for Jamie Crawford (Dundonnell)
Neil Wright .....	Mandatory for Philip Smith (Coulin).

### **Lower Proprietors**

Gordon Crawford.....	Mandatory for Nicholas Crawford (Eilean Darrach)
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### **Co-optees**

There are no salmon netsmen in the Board area. The Angler's representative is Andrew D Barclay.

## **Board Staff**

The Board meets its obligations with one part-time staff member and voluntary positions:

Kevin Ginty replaced Peter Jarosz on 1<sup>st</sup> May 2024 following the latter's retirement on 31<sup>st</sup> July 2024.

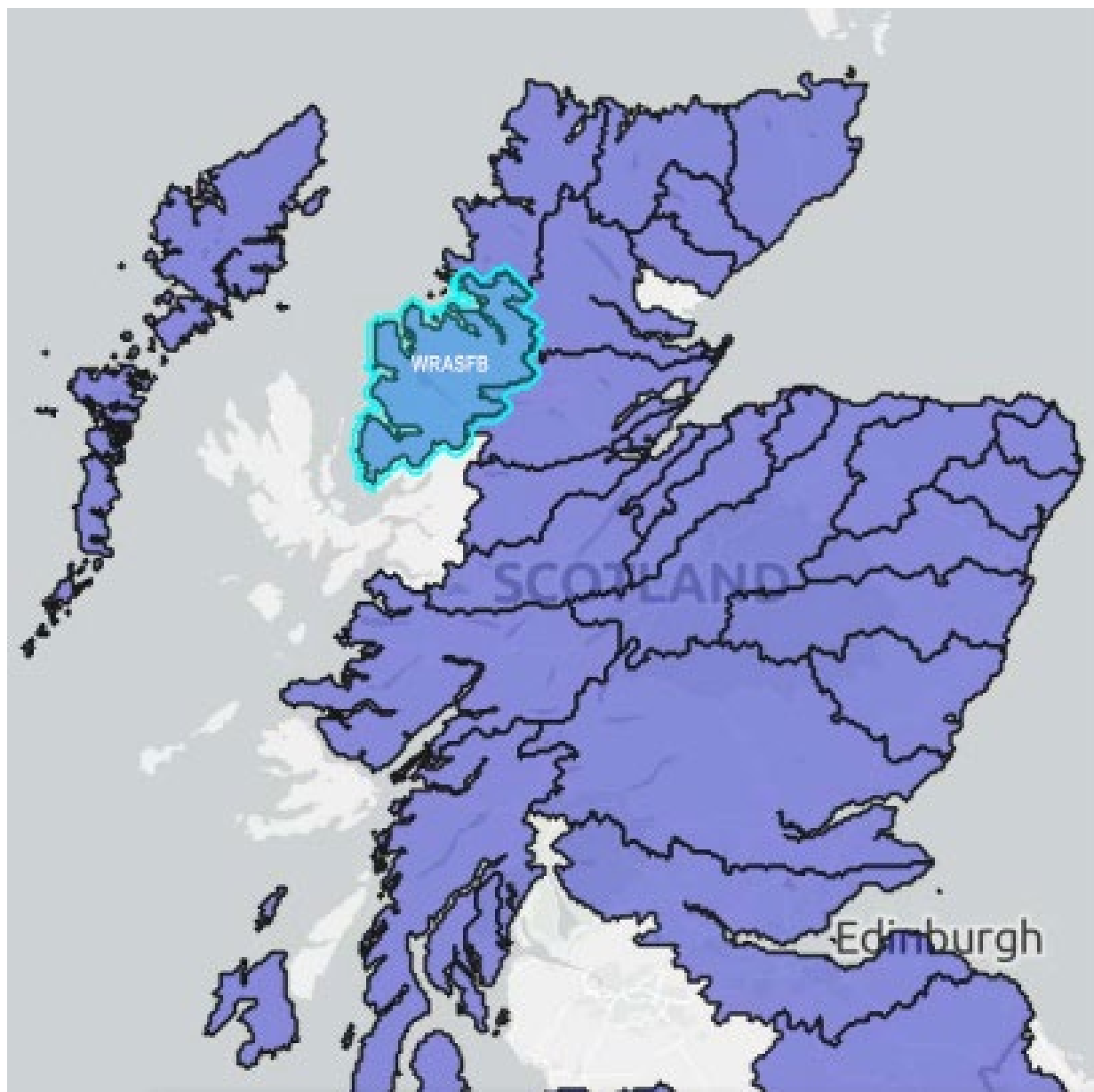
Kevin Ginty.....	Clerk to the Board (P/T)
Gary Ross.....	Water Bailiff (v)
Ray Dingwall.....	Water Bailiff (v)
Neil Morrison.....	Water Bailiff (v)

Duncan Mackenzie.....Water Bailiff (v)

Finlay Owen .....Water Bailiff (v).

## The Area

The area coloured blue on the map below identifies the approximate designated geographical area of the Board



### **What We Do**

Most DSFBs throughout Scotland are responsible for only one river within one catchment and the funding raised by the levies is used to provide protection and enhancement of salmon stocks throughout the whole system where every proprietor sees the benefits.

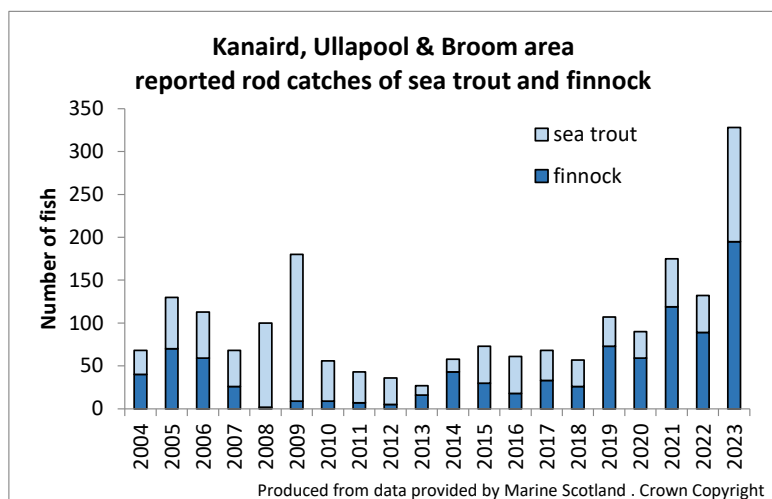
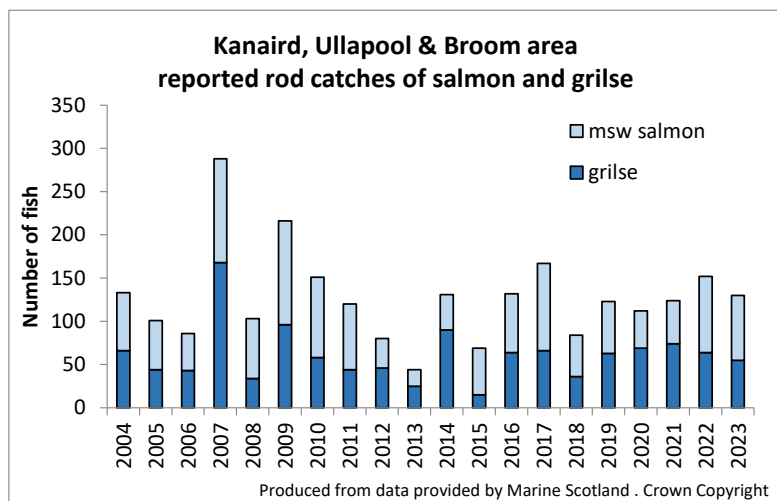
The WRASFB however, has one of the highest numbers of rivers / catchments within its boundaries so, recognising the geographical extent of the Board area (Kanaird to Applecross) and the high numbers of rivers within it, the WRASFB addresses at Board level only those tasks which are essential or are most effectively handled centrally as part of the Board's statutory remit. All other basic river management aspects remain with the proprietors.

## Salmon and Sea trout Catch Statistics

The graphs below have been produced from published catch figures to include the 2023 season and figures for individual river systems and can be found here <https://scotland.shinyapps.io/sg-salmon-sea-trout-catch/>.

A commentary for 2023 for Scotland as a whole can be found here <https://www.gov.scot/publications/scottish-salmon-sea-trout-fishery-statistics-2023/>.

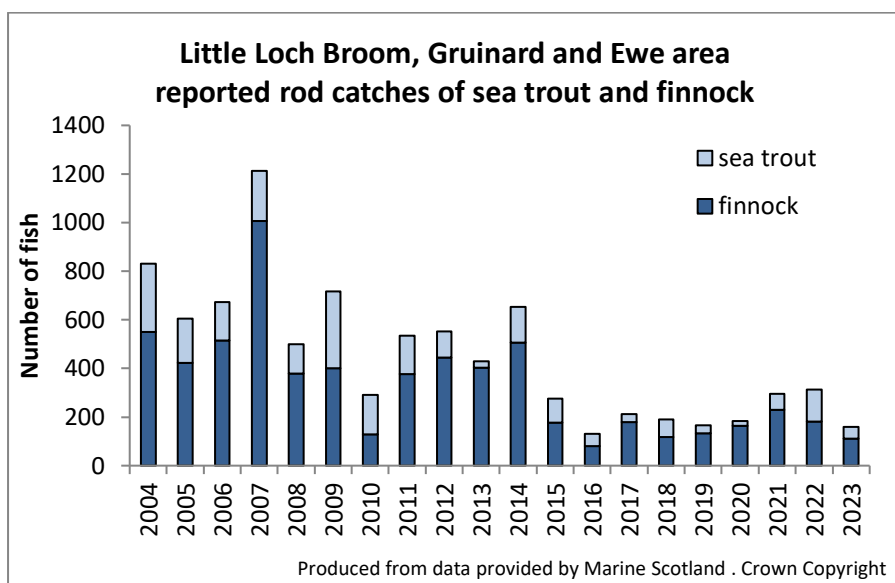
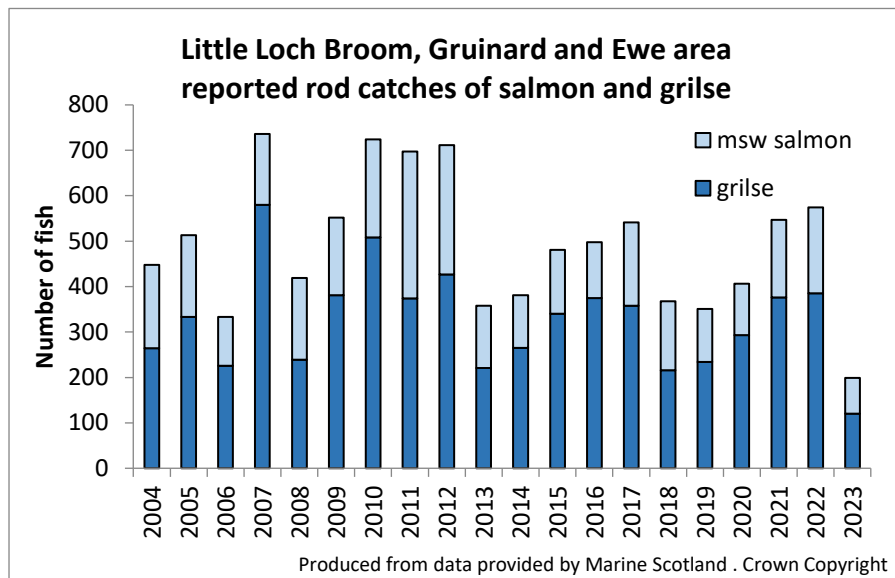
### 1. Kanaird, Ullapool & Broom are reported rod catches



Commentary: rod catch of salmon and grilse slightly down on 2022 but not so much as for other districts. For sea trout and finnock a good catch, the Kanaird and Broom contributed most fish.

Anecdotal reports were that anglers fishing in the sea for sea trout also caught many fish in 2023, but fewer in 2024 following high reported levels of sea lice infestation in spring 2024, also recorded by WRFT (see here: <https://wrft.org.uk/files/SeatroutReportKanaird24May24.pdf>).

## 2. Dundonnell River to River Ewe



Commentary: after relatively high numbers of salmon caught in 2021 and 2022, the very low total catch of salmon in 2023 is due to the lowest River Ewe catch for many years, and to much reduced catches for 'Guinard' (big Guinard and Little Guinard rivers) from 352 fish in 2022 to 63 in 2023.

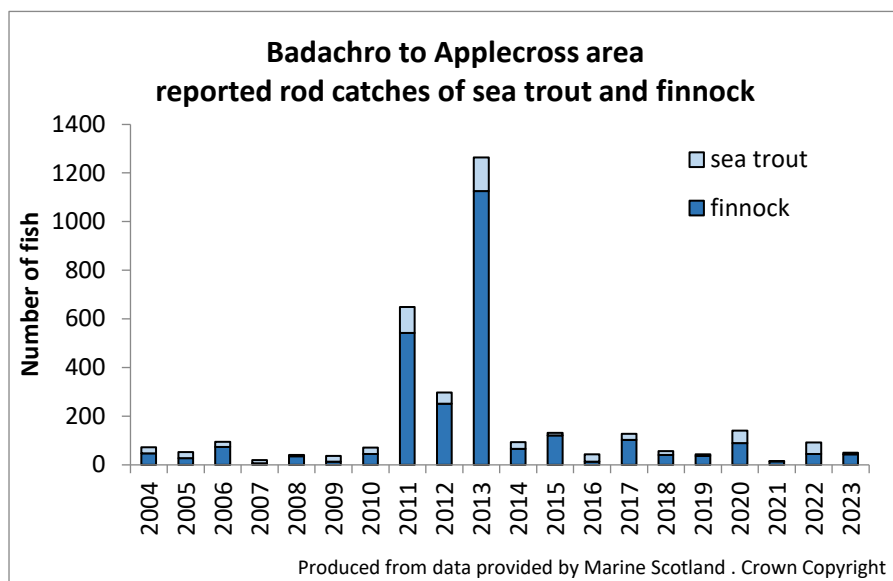
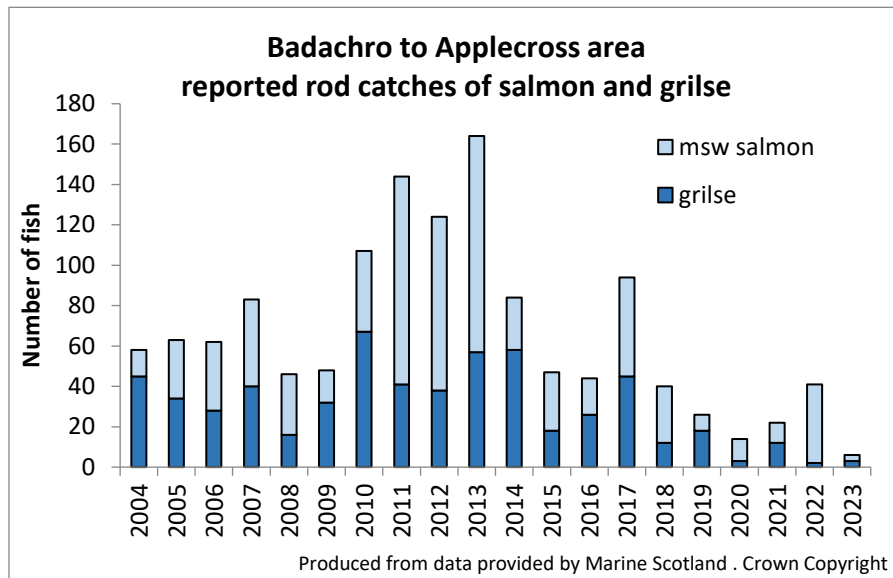
Did these low catches relate to poor fishing conditions, reduced fishing effort, a lack of fish or all of these things? Maybe some salmon entered the rivers late in the season after most angling effort had finished? Were all catch returns for these areas reported to Marine Scotland?

It is several years since the WRFT e-fish team has been able to survey juvenile salmon in headwater streams above Loch na Sealga, Abhainn Srath na Sealga and Abhainn Gleann na Muice; it would be useful to find out how juvenile salmon populations are doing in the more marginal headwater streams.

There are still no signs of a sustained sea trout recovery.

### 3. Badachro to Applecross

The graphs below are for the Kerry, Badachro, Torrison and Applecross rivers.



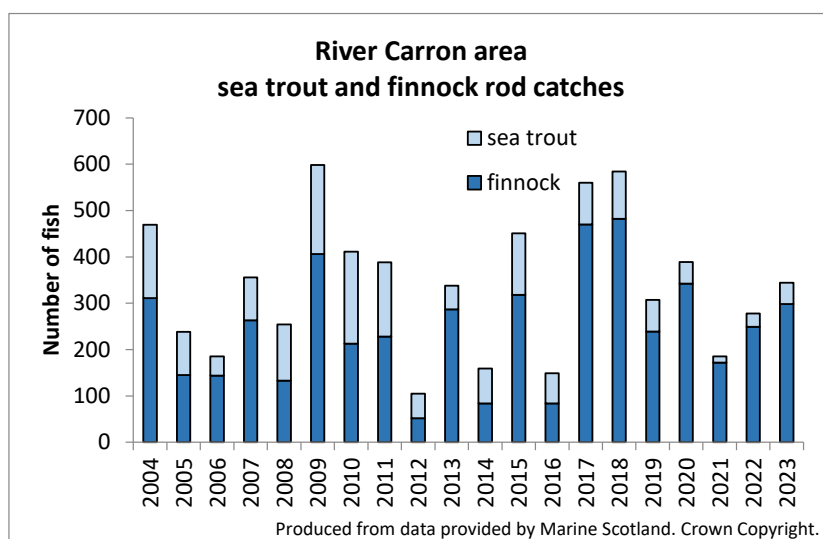
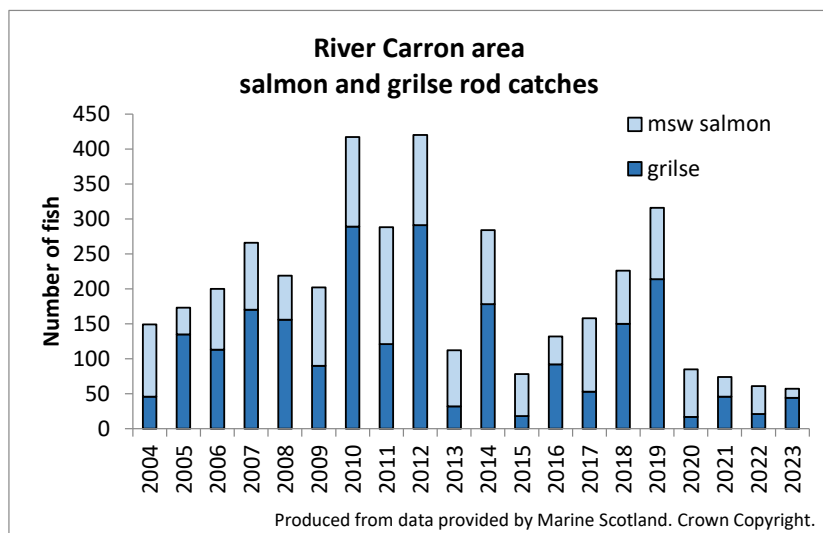
Commentary:

Alarminglly low numbers of salmon were recorded.

For salmon, WRFT e-fish teams have surveyed the Torrison River, Balgy and Applecross rivers catching reasonable numbers of salmon fry at some sites, but not all sites. Therefore, the situation for salmon populations in these rivers may not be quite so dire as the rod catches graph suggests, though the rivers from Loch Torrison south are likely down to very low numbers of adult female salmon, far below numbers needed to sustain egg deposition for optimum juvenile salmon production from the accessible habitat.

#### 4. River Carron

Though outside the Board area, these graphs have been included as in previous years for comparison with rivers further north in the WRASFB area.



#### Commentary

Most of the salmon are recorded by Bob Kindness who has maintained excellent records so far as separating MSW salmon from grilse. The grilse catch in 2023 was higher than in 2022, however the multi-sea winter salmon catch was the lowest in recent years. Both the grilse catch and MSW salmon catch appear to be going up and down as in previous years (to 2017); attributed to sea lice infestation of emigrating post smolt salmon through coastal waters, in relation to farm salmon production cycles on nearby farms in previous years (see [WRFT Reviews](#) to 2016 and [SWRFT Reviews](#) esp. SWRFT Review 2018, page 6, page 8 and from page 31). Salmon smolts have to pass through waters subject to infestation of larval sea lice from many salmon farms in Loch Carron, Loch Kishorn, Loch Alsh (water currents flow north) and the east coast of Skye. Finnock catches were quite good; these fish would mostly venture no further than Loch Carron.

The Board authorises and funds WRFT to conduct the electro-fishing surveys that are carried out on a bi-annual, rolling-programme basis. The Board also authorises and funds the WRFT in the collation and interpretation of the annual catch returns which along with the electro-fishing data is fed into a Marine Scotland model which when interpreted correctly, can assist in determining the health of the juvenile salmon stocks of rivers within the Board area. The Board also authorises and funds WRFT in the collation and interpretation of sea-lice data for Board responses to aquaculture planning applications and proposes to continue to do so insofar as applicable under the new regulatory regime operated by SEPA for the control of fish-farm-generated sea-lice.

In 2023, the WRFT electrofishing team surveyed sites in the following river systems: Kanaird, Ullapool, Dundonnell, Gruinard, Little Gruinard, Allt Beith, Tournais, Ewe (tributaries at Kernsary, Bruachaig, Kinlochewe, Coulin, Slattadale), Sguod, Kerry, Balgy, Cuaig and Applecross. Sites were surveyed as part of the National Electro-fishing Programme of Scotland (NEPS) funded by the Scottish Government and for the biennial survey to inform WRASFB. Additional sites may be surveyed in October 2024. Agreements were reached with the aquaculture companies for monitoring to occur in Torridon for both sweep netting and electrofishing (Rivers Torridon and Balgy). This was previously performed by APEM Ltd instructed by Mowi and Bakkafrost.

Salmon fry and parr were recorded at Catch per Unit Effort (CPUE) levels indicative of generally healthy salmon populations (in terms of numbers of fish) in the Little Gruinard River system (including tributaries around the Fionn Loch), in the River Kanaird – including a site in the Runie, the River Kerry, the Allt Beith, the Coulin River, Grudie River and Docherty burn. Fewer salmon were found in the Applecross River and in the Little Tournais system (very few fry); none were found at a single site (selected under the NEPS programme) at the top of the Balgy system and a site in the Cuaig. Salmon fry of wild origin were found in the Bruachaig (Ewe system) by the Heights of Kinlochewe in July 2023 indicating that wild salmon had spawned above the falls in 2022 for the first time since 2018.

As in previous recent surveys, there was a big difference in the size at age of juvenile salmon. Salmon fry were particularly small for their age at some sites in the Gruinard River, in the Little Gruinard River and in the Coulin River (Ewe headwaters). Some fish looked like they were starving with a disproportionately large head and thin body.

Especially during the late summer, juvenile salmon in some of the wider rivers without riparian trees, woody debris or other nutrient sources entering the river, grow very slowly or not at all because of an inadequate food supply, and perhaps also because of higher water temperatures which causes them to use up their energy reserves faster. [Huusko et al \(2011\)](#) found that juvenile salmon may shrink when subject to harsh living conditions, with shortening of the spine.

The Board is supporting a PhD student undertaking a study into Saprolegnia – a fungal-like organism that infects freshwater fish and their eggs. The Board agreed to pay £1,000 annually for three years, and this has since been reduced to £871.

In 2025 the Board shall continue to fund WRFT to conduct monitoring activities and such other work as may be considered necessary for the Board to meet its statutory remit.

### **Fisheries Management**

Whilst the physical day-to-day fisheries management aspects are left to the proprietors' discretion, the Board, with assistance from WRFT, is a statutory consultee for all aquaculture, hydro-planning applications and consultations, to which it responds as appropriate. See below under 'Wild Fisheries Reform'

### ***Planning consents for the operation of in-shore aquaculture sites***

On 14 June 2023, THC formally approved Environmental Management Plans for the operation of three farms in the Torridon loch system, being Camas an Leim (Mowi), Aird and Sgeir Dughall (Bakkafrost). The application for Aird was for additional biomass, to be added to the existing consent. These EMPS were required by conditions imposed on the relevant planning consents, which also specified a framework with which the EMPs were to comply.

In 2023, representations to THC were made on behalf of the Board both orally (at a meeting on 27 January 2023 attended by representatives of MSS and FMS) and subsequently in writing. Those representations built on the earlier extensive representations made on behalf of the Board as a result of legal advice and expert scientific opinion: that the EMPs proposed by Mowi and Bakkafrost did not comply with the planning conditions.

Despite the shortcomings of those EMPs, the effect of a further condition of the planning consent in respect of Aird is that Bakkafrost does not farm at its Kenmore site in the Torridon loch system, previously consented for a similar biomass to the additional biomass consented for Aird. This was consistent with the position taken by the Board in opposition to the planning application for the additional biomass at Aird: that the Torridon loch system was 'full up' for farmed salmon particularly in view of levels of sea lice from aquaculture operations by the operator(s) in the loch system.

On 22<sup>nd</sup> July 2024 and 1<sup>st</sup> August 2024, the Board met with Bakkafrost and MOWI as envisaged by the EMPs for those three farm sites. The Board was updated on sea-lice control by those companies and the parties discussed possibilities and developments for reducing the sea-lice loads generally and in particular in the salmon smolt migration period. A report on wild fish monitoring was also discussed, as well as the possibility that WRFT would take over some or all of the wild fish monitoring from Apem Ltd. who had been engaged by Mowi and Bakkafrost. This has since happened and WRFT was engaged by those two companies to undertake the wild fish monitoring.

A follow-up meeting took place between the Board and Bakkafrost to further explore reducing sea lice exposures during that migration period.

In July 2022 a S42 planning application had been submitted by WRF Ltd to the HC for the Ardmair fish farm site. The condition that they were seeking to remove was the ten-year term of their 13/01494/FUL planning consent that the farm was currently operating under. In September 2022 the HC formally invited the WRASFB as a consultee to respond. This application was far from straight forward as although it was submitted by WRF Ltd, Mowi had secured a 75% stake in WRF Ltd. The WRASFB response was against a permanent planning consent and urged HC to either refuse this S42 or impose another ten-year term condition. Despite our objections (along with a number of other objections), on 11 April 2023 the S42 was consented by the HC with a "standard" EMP that the WRASFB was not consulted on. The EMP did include the necessity for wild fish monitoring.

On 16<sup>th</sup> July 2024, a meeting with MOWI took place as envisaged by the EMP. WRFT reported on wild fish monitoring that it had undertaken close to Ardmair that showed significant damage by sea-lice to finnock/sea-trout. Discussions took place regarding the reduction of sea-lice burdens at the Ardmair site.

On 23<sup>rd</sup> February 2024, the Board attended an EMP meeting for Caol Mor. Discussions took place with Mowi regarding the mitigation of sea lice and changes in salmon production that may reduce adverse impacts on wild fish. Though this farm is just outside the Board's area, WRASFB has taken part in the arrangements under the EMP for this site because of the potential effects of sea-lice emanating from the farm transported by sea currents from the east coast of Skye moving northwards into the Board area.

On 6 September 2023 WRF Ltd submitted a planning application for an automatic feed barge for their Corry fish farm in Loch Broom. This application has now been withdrawn.

In the coming year, further interactions with producers regarding EMPs and the monitoring of wild fish and sea lice will be arranged.

On 30<sup>th</sup> September 2024, a planning application for the “Extension of existing dam and access track” at Slattadale was lodged with Highland Council. A response was prepared and submitted on 14<sup>th</sup> October 2024 detailing concerns regarding monitoring of potential impacts on salmon spawning potentially disturbed by fluctuating water levels.

### **Catch and Release Best Practice Guidance**

Guidance on catch and release is on the Board’s website.

<http://wrasfb.dsfb.org.uk/files/2013/06/Catch-and-Release-leaflet-2017.pdf>

### **Fisheries Protection**

The WRASFB’s levy income means it is not financially possible to employ any full-time water bailiffs but it authorises those who have passed the bailiff qualification course of the IFM. Although directly employed by individual fisheries, combined operations within the Board area have been carried out in past years. The Scottish Government moratorium on coastal / mixed stock netting operations throughout Scotland continues to be in force. It is also a criminal offence to be in possession (and also to kill) wild salmon from a river in the Board area with a category 3 conservation status.

### **Fisheries Development**

In the Board area, the bigger rivers are usually fully booked during their normal fishing season. For others that are fully dependent on rain, anglers have not been keen to buy any days on rivers that may or may not have water or fish. There is licensing of angling to local communities, e.g. the Shieldaig Angling Club has enjoyed a rent-free licence to fish the Balgy river in 2023 and in previous years.

### **Wild Fisheries Reform**

Whilst few of the recommendations of the WFR have been given effect to by ScotGov, one important development is that SEPA has assumed a role as the regulator for sea-lice interactions between aquaculture and wild fish, with powers to grant or refuse development consents.

On 15 September 2023, SEPA closed its consultation on its proposed new regulatory framework. The Board continued to engage with the consultation process throughout 2023. Having submitted detailed written representations (that can be found on the WRASFB web site) to SEPA in 2022 as part of its consultation process, Board representatives attended public consultation sessions convened by SEPA earlier this year and liaised with FMS as to the content of FMS’s response on behalf of DSFBs.

SEPA has since taken on the lead regulatory responsibility for managing sea lice and wild salmon interactions from 1 February 2024 and for managing sea lice and sea trout interactions, from March 2025: see further at: [sepa.org.uk/regulations/water/aquaculture/sea-lice-regulatory-framework-implementation/](http://sepa.org.uk/regulations/water/aquaculture/sea-lice-regulatory-framework-implementation/)

## **Compliance with Good Governance Requirements**

### ***Governance***

The Aquaculture and Fisheries (Scotland) Act 2013 requires all DSFBs to operate in a transparent manner. As part of this, WRASFB uses the FMS Code of Good Practice. A copy of the code can be found at the FMS web site: [www.asfb.org.uk/publications](http://www.asfb.org.uk/publications).

This section of the report details how the WRASFB meets and proposes to continue to meet the terms of the reporting requirements of the Aquaculture and Fisheries (Scotland) Act 2013.

### ***Meetings***

The annual public and proprietors' meetings for this year have been made open to the public and advertised on our web site ([www.wrasfb.dsfb.org.uk](http://www.wrasfb.dsfb.org.uk)), along with agenda information. They have also been advertised in the local press, at least 21 days prior to the scheduled meetings taking place. The Board meeting for 4 November 2024 has been advertised on the website and made open to the public. The minutes of all meetings, once approved, are also published on our web site, including the board meeting that took place on 17<sup>th</sup> April 2024.

### ***Complaints***

The Aquaculture and Fisheries (Scotland) Act 2013 requires all DSFBs to establish a formal complaints procedure. A copy of the WRASFB complaints procedure is available at [WRASFB Complaints Procedure](#). There were no complaints made to the Board in 2023 and 2024.

### ***Declaration of Interests***

All members of the WRASFB are required to complete and keep up-to-date a declaration of interests relevant to their position on the Board. The current register is available at the WRASFB office.

### **Financial Accounts 2023-2024**

To be presented at the meetings.