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30 March 2022

MORAY FIRTH – MF01 - RIVER CARRON, RIVER DEVERON, RIVER FINDHORN, RIVER OYKEL, RIVER SHIN, RIVER SPEY RIVER NESS – SEAL LICENCE CONSULTATION

Marine Scotland Science have reviewed the relevant documentation and have provided the following comments.

Application

This application covers seven different rivers (Spey, Deveron, Ness, Findhorn, Carron, Oykel and Shin) in the Moray Firth catchment, therefore information provided on seal presence, predation events witnessed, use of non-lethal measures and justification for takes is summarised across all rivers. Comments on salmon conservation status of each river in turn, together with specific comments on the seal licence applications for each river individually, are provided in separate responses:

[2022-24-03- MORAY FIRTH - MF01 - RIVER CARRON - Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

[2022-24-03- MORAY FIRTH - MF01 - RIVER SHINSEAL - Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

[2022-24-03- MORAY FIRTH - MF01 - RIVER OYKEL - Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

[2022-24-03- MORAY FIRTH - MF01 - RIVER DEVERON - Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

[2022-24-03- MORAY FIRTH - MF01 - RIVER FINDHORN - Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

[2022-24-03- MORAY FIRTH - MF01 - RIVER NESS- Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

[2022-24-03- MORAY FIRTH - MF01 - RIVER SPEY- Seal Licence Consultation - MSS Response Letter details - Objective ECM \(scotland.gov.uk\)](#)

Number of seals and feeding activity

The applicant has reported 10 instances of harbour seals and 21 instances of grey seals in the Findhorn, Spey and Ness rivers in the last year, across all seasons.

The applicant has witnessed 18 predation events by either harbour seals or grey seals in the Findhorn, Spey and Ness rivers in the last year, across all seasons.

The applicant has provided the following information on seal presence and feeding activity in the rivers: surveys for seals in the Deveron and Ness and Findhorn rivers have been restricted by covid, but sightings still noted down.

MSS advise that without any evidence for the presence of seals within the rivers Carron, Deveron, Oykel and Shin the justification for granting licences to take seals is weaker than if such evidence were to be provided.

Interpretation of seal numbers provided is difficult because no information is provided on how they were collected and they are not effort related.

Number of seals requested on the licence

The NERC Special Committee on Seals (SCOS) reports to Scottish Government annually on Potential Biological Removal (PBR) numbers for the two resident seal species. These numbers represent the maximum anthropogenic take from the seal populations within a seal management area in order for the populations to be sustainable, and reflect both the population size and trend. Takes from shooting must be cumulated and assessed alongside all other anthropogenic takes of seals within the management area, including, for example, bycatch and collision with tidal turbines. We note that seals taken through bycatch and other incidental takes are not planned and are therefore difficult to cumulate for annual assessment. Bycatch data from previous years are also not produced at the same spatial scale as the seal management areas making their inclusion in considerations more complicated. As a result, MSS recommend that MS-LOT take a cautious approach to determining the number of licences for seal takes that can be issued.

The PBR limits advised by SCOS (2021) for seals in this seal management area are 370 for grey seal and 6 for harbour seal. To our knowledge, there are no other planned anthropogenic takes from the seal populations in this seal management area.

The total requested seals from all applications in the Moray Firth seal management area in 2022 is 30 grey seals and 8 harbour seal. MSS advise that the requested licences for grey seals fall well within the PBR limit for the seal management area both individually and cumulatively. However, the declining harbour seal population in this seal management area, and the correspondingly small PBR mean that there is limited capacity for to account for any bycatch or other incidental take from the harbour seal population. This leads MSS to recommend that no licences should be granted for harbour seals in this seal management area.

Non-lethal deterrents

The applicants have, in the case of the Findhorn, Ness and Spey rivers, provided evidence on the use of alternative non-lethal techniques to reduce seal predation. Some non-lethal techniques to reduce seal predation have been utilised on the Spey including harassment but ADDs were deemed not suitable. Noise harassment has been utilised on the Ness and starter pistols had limited success. Paintball guns will be trialled on the Ness. A previous attempt to relocate a harbour seal was unsuccessful. An ADD trial on the River Ness in conjunction with SMRU was ineffective. Harassment techniques on the Findhorn have been been ineffective so far but there are plans to try boat approaches and paintball guns. ADDs have been used on Findhorn previously to no effect.

MSS recommend that prior to lethal removal, applicants explore further non-lethal measures to reduce depredation or displace seals from critical areas of the river. These non-lethal measures have been extensively reviewed in a recent Marine Scotland report (Thompson et al. 2021).

References

Thompson, D, A J Coram, R N Harris and C E Sparling. (2021). Review of non-lethal seal control options to limit seal predation on salmonids in rivers and at finfish farms. Scottish Marine and Freshwater Science Vol 12 No 6, 136pp. DOI: 10.7489/12369-1

<https://data.marine.gov.scot/dataset/review-non-lethal-seal-control-options-limit-seal-predation-salmonids-rivers-and-finfish-0>

Hopefully these comments are helpful to you. If you wish to discuss any matters further then please contact the REEA Advice inbox at MSS_Advice@gov.scot

Yours sincerely,

Renewable Energy Environmental Advice
Salmon and Freshwater Fisheries
Marine Scotland Science



██████████
Marine Licencing Officer,
Marine Scotland – Marine Planning & Policy

22 March 2022

By email

Our ref: A3687244

Dear ██████████

2022 Seal Licence Consultation – Applications for a licence authorising the killing or taking of seals to conserve seals or other wild animals (including birds) or wild plants in Scotland

Thank you for consulting us on this year's seal licensing applications (Table 1). These constitute the second year of applications following the amendment to the Marine (Scotland) Act 2010, and the first following Marine Scotland's updated guidance.

Overarching considerations

The number of Atlantic salmon returning to Scottish coastal waters have declined since the 1970s¹, and the estimated number of spawning salmon has declined from 2010¹. There are a number of potential factors driving the decline throughout the lifecycle, *i.e.* within the river system and the open seas. These factors include; climate change (especially water temperature), marine development, water quality, in-stream barriers to movement, overfishing, exploitation, and predation. Predators include otter, piscivorous birds, other fish, cetaceans, as well as both seal species (harbour and grey).

River Status- Salmon Grade

Scottish Government assess the conservation status of salmon on a river-by-river basis² annually. Conservation status is defined by the probability of stock meeting its egg deposition target over a five-year period. The assessment result in a grading award of 1, 2 or 3 to each river.

¹ <https://www.gov.scot/publications/scottish-wild-salmon-strategy/>
<https://www.gov.scot/publications/salmon-fishery-statistics-2020/>

² <https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings-for-2022-season/>

Table 1 - Seal Licence applications for 2022

Seal Management Areas	Applicant	River Grading	MPA consent	Licence recommendation	Page
Southwest Scotland	SW02 – River Nith	3	Yes	Possible Permit ⁵	7
	SW06 – River Shira (Argyll DSFB)	3	N/A	Reject ²	8
West Scotland	WS05 – River Awe (Argyll DSFB)	3	N/A	Reject ²	8
	WS05 – River Creran (Argyll DSFB)	3	N/A	Reject ²	9
	WS05 – Loch Etive (Argyll DSFB)	3	Yes	Reject ²	9
Western Isles	WI18 – Grimersta Estate (River Langavat SAC)	1	Yes	Reject ¹	10
	WI28 – Garynahine Estate (river Blackwater)	1	Yes	Reject ¹	10
Orkney & North Coast	ONC05 – River Halladale	1	Yes	Reject ¹	11
	ONC08 – River Naver SAC	1	Yes	Reject ¹	11
Moray Firth	MF01 – River Carron	1	N/A	Reject ¹	12
	MF01 – River Deveron	2	N/A	Possible Permit ³	13
	MF01 – River Findhorn	1	No	Reject ¹	13
	MF01 – River Oykel SAC	1	Yes	Reject ¹	14
	MF01 – River Shin	1	Yes	Reject ¹	15
	MF01 – River Spey SAC	1	No	Reject ¹	15
	MF01 - River Ness	2	N/A	Possible permit ³	16
East Scotland	EC06 – River Tay SAC	1	Yes	Reject ¹	17
	EC07 - River Ythan	3	N/A	Possible permit ⁴	17
	EC23 - Park Fishery – River Dee SAC	1	Yes	Reject ¹	18

¹reject on the grounds of Grade 1 conservation status

²reject on the grounds that the case for salmon conservation has not been made due to seal presence being 'rare' or 'on occasion'

³reject for harbour seals, but possible permit for grey seals

⁴please see our concerns due to the proximity to the Ythan designated seal haul out

⁵Possible permit for both harbour and grey seals

- **Grade 1** – reflects the probability of at least 80% of stock meeting its egg deposition target over a five-year period - suggests exploitation is sustainable – **Good conservation status**,
- **Grade 2** – reflects the probability of between 60- 80% of stock meeting its egg deposition target over a five-year period - suggesting management action is needed to reduce exploitation - **Moderate conservative status**, and,

- **Grade 3** – reflects the probability at less than 60% of stock meeting its egg deposition target over a five-year period suggesting that exploitation is unsustainable – **Poor conservation status.**

NatureScot Overarching Advice

For the purposes of seal licencing, we remain of the view that although these gradings relate to sustainable exploitation, a grade 1 suggests the salmon stock in that river/area is in good health. The assessment is based on the salmon stock numbers, and therefore exploitation is related to both anthropogenic and natural removal.

Our advice therefore is that there is no case for lethal removal of seals in Grade 1 Rivers.

In any consideration of lethal removal of seals for the purposes of salmon conservation, we also feel it is relevant to highlight emerging evidence³ that the catching of salmon causes stress and damage to the individual, potentially affecting fitness, and suggest that further restrictions on catch and release may therefore merit consideration. Notwithstanding this, for Grades 2 and 3, our consideration is whether the lethal removal requested will make a material difference to the conservation status of the salmon and/or the conservation status of either seal species.

The numbers of seal take requested are considered with regard to the regional Potential Biological Removal (PBR) values (Table 2) for the Seal Management Area (SMA) concerned. PBR values are calculated annually by the Sea Mammal Research Unit, and reflect a calculation as to how many animals may be removed from a population. **Our view is that, under this licensable purpose, it is not enough for the requested take to be below the seal PBR, the evidence needs to show that lethal removal is necessary for salmon conservation.**

Consistent with advice provided by NatureScot last year, we recommend that all licences for Grade 1 Rivers should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of seals is not necessary for the conservation of salmon.

We also remain of the view that licences for the lethal removal of harbour seals in the East coast and Orkney and north coast management areas are rejected due to the continued population decline of this species in these areas.

Where licensing is deemed appropriate by MSL0T, we recommend that each method statement should specifically detail the non-lethal methods deployed including methods, duration and

³ Lennox, R.J., Cooke, S.J., Diserud, O.H., Havn, T.B., Johansen, M.R., Thorstad, E.B., Whoriskey, F.G., Uglem, I., 2016. Use of simulation approaches to evaluate the consequences of catch-and-release angling on the migration behaviour of adult Atlantic salmon (*Salmo salar*). *Ecol. Model.*, 333, 43–50. <http://dx.doi.org/10.1016/j.ecolmodel.2016.04.010>

Lennox, R.J., Uglem, I., Cooke, S.J., Naesje, T.R., Whoriskey, F.G., Havn, T.B., Ulvan, E.M., Solem, O., Thorstad, E.B., 2015. Does catch-and-release angling alter the behavior and fate of adult Atlantic salmon during upriver migration? *Transactions of the American Fisheries Society*, **144**, 400–409. <https://doi.org/10.1080/00028487.2014.1001041>

Travis E. Van Leeuwen, J. Brian Dempson, Chantelle M. Burke, Nicholas I. Kelly, Martha J. Robertson, Robert J. Lennox, Torgeir B. Havn, Martin Svenning, Ross Hinks, Matthew M. Guzzo, Eva B. Thorstad, Craig F. Purchase, and Amanda E. Bates. Mortality of Atlantic salmon after catch and release angling: assessment of a recreational Atlantic salmon fishery in a changing climate. *Canadian Journal of Fisheries and Aquatic Sciences*. **77**(9): 1518-1528. <https://doi.org/10.1139/cjfas-2019-0400>

recording of methods used, it should also provide details of any Acoustic Deterrent Device (ADD) use.

Table 2 - Seal Licence applications for 2022, together with the regional Potential Biological Removal (PBR) figures

Seal Management Areas	Regional PBR for 2021 ⁴ (draft 2022) ⁵		Applicant	Requested take	
	Harbour seal	Grey seal		Harbour seal	Grey seal
Southwest Scotland	71 (71)	116 (119)	SW02 – River Nith	1	1
			SW06 – River Shira (Argyll DSFB)	1	2
West Scotland	936 (936)	933 (966)	WS05 – River Awe (Argyll DSFB)	1	2
			WS05 – River Creran (Argyll DSFB)	1	2
			WS05 – Loch Etive (Argyll DSFB)	1	2
Western Isles	105(105)	1291 (1336)	WI18 – Grimersta Estate (River Langavat SAC)	0	5
			WI28 – Garynahine Estate (river Blackwater)	0	6
Orkney & North Coast			ONC05 – River Halladale	2	4
			ONC08 – River Naver SAC	1	1
Moray Firth	6 (6)	370 (383)	MF01 – River Carron	1	2
			MF01 – River Deveron	2	6
			MF01 – River Findhorn	1	9
			MF01 – River Oykel SAC	1	4
			MF01 – River Shin	1	2
			MF01 – River Spey SAC	1	5
			MF01 - River Ness	1	2
East Scotland	2 (2)	823 (852)	EC06 – River Tay SAC	1	5
			EC07 - River Ythan	0	6
			EC23 - Park Fishery – River Dee SAC	1	3

Where MS LOT determine a licence could be granted for grey seals and not harbour seals (e.g. Moray Firth) correct species identification will be of the utmost importance.

Where lethal removal is licenced, we suggest that recent evidence⁶ of the physiological and other impacts associated with the catch and release of Atlantic salmon should be reviewed, and

⁴ <https://www.gov.scot/publications/marine-licensing-map-of-seal-management-areas-and-provisional-pbr/>

⁵ Draft SCOS 2021 (unpublished)

⁶ Travis E. Van Leeuwen, J. Brian Dempson, Chantelle M. Burke, Nicholas I. Kelly, Martha J. Robertson, Robert J. Lennox, Torgeir B. Havn, Martin Svenning, Ross Hinks, Matthew M. Guzzo, Eva B. Thorstad, Craig F. Purchase, and Amanda E. Bates. 2020. Mortality of Atlantic salmon after catch and release angling: assessment of a recreational Atlantic salmon fishery in a changing climate. *Canadian Journal of Fisheries and Aquatic Sciences*. **77**(9): 1518-1528. <https://doi.org/10.1139/cjfas-2019-0400>

consideration given to the need for further measures or regulation on the catching of salmon in those rivers. The potential impacts associated with catch and release of salmon are not mentioned in any of the applications and perhaps should be, as the aim here is the conservation of Atlantic salmon.

We consider that the assessment of seal predation in rivers should be based on the number of seals that can be clearly identified as taking salmon, and not on the number of seals observed in the area, because not all seals present in the river are 'salmon/river specialists'. In addition, whilst some seals may have a direct impact on salmon through feeding, fisheries also include the indirect impact on their fishery by affecting the rod activity. Our view is that seal shooting should only be used as a last resort where all appropriate non-destructive alternatives have been exhausted. **We wish to see greater demonstration that there is no satisfactory alternative way to mitigate seal predation/damage on salmon.**

Both harbour and grey seals are protected species. We have therefore considered each location's connectivity to Seal SACs, together with any overlap with Seal Designated haul-outs. Where a licence location is within 20km of a grey seal SAC, or 50km of a harbour seal SAC, we offer advice on HRA.

The lethal removal of individual seals has obvious welfare issues for the seal. The licence requires that the shooting is undertaken by a suitably qualified named person. Although the retrieval of the carcass is not often done, we strongly recommend that there should be greater effort to comply with this recommendation should licences be approved.

The shot seal should be retrieved and either taken to Scottish Marine Animal Stranding Scheme (SMASS)⁷, or retrieved by SMASS so that a necropsy can be undertaken. We would welcome further discussion regarding compliance monitoring with yourselves in connection with species identification and numbers of seals actually shot.

In the annex to this letter we provide advice for all applications, and a consent response under section 116 (2) of the Marine (Scotland) Act 2010, for those applications where shooting is proposed within a protected area.

General comments on quality of licence applications

Whilst the quality of applications is much improved from last year, the evidence supplied to support the lethal removal on the conservation of salmon is still weak. The argument put forward by the applicants is that any seal seen in the area will be preying on salmon, and any adult salmon removed from the population, or damaged will have an impact on the number of eggs laid. Whilst we agree with this in general terms, it is difficult to evidence how the removal of seals will

Magdalene Papatheodoulou, Libor Závorka, Barbara Koeck, Neil B. Metcalfe, and Shaun S. Killen. 2021. Simulated pre-spawning catch and release of wild Atlantic salmon (*Salmo salar*) results in faster fungal spread and opposing effects on female and male proxies of fecundity. *Canadian Journal of Fisheries and Aquatic Sciences*. **79**(2): 267-276. <https://doi.org/10.1139/cjfas-2021-0089>

⁷ <https://strandings.org/>

result in a significant benefit to salmon numbers, in the context of all other variables relating to in river salmon stock and therefore improve conservation status.

Covid was highlighted as a reason why there was a lack of recorded observations of seals in the rivers applied for. However, there was also mention of an app. under development by the Scottish Fisheries Coordination Centre that should provide more formal data in the future.

The locational detail supplied this year was very useful for our considerations.

Non-lethal methods sections were completed in all cases. Our view on these methods identified is as follows.

- *Barriers*

Some applicants misunderstood this section and detailed what barriers were or were not within the particular stretch of river, rather than implementing a barrier to restrict seals from key locations. Most put forward the argument that the introduction of barriers in order to keep seals out of the area would be counterproductive, in that they would hinder passage of the fish, and that they would catch river debris and further impede flow. We agree with this general assessment.

- *Harassment*

All applicants stated that general harassment methods would be tried before shooting of a seal occurred. Methods suggested included, human presence, shouting, clapping of hands, paint ball guns and shooting in the air. Many put forward the view that these do not work well because seals in the area generally habituate to such methods. We tend to agree, but maintain all methods should still be tried, and that applicants should also consider new suggestions arising in the future.

- *Translocation*

All stated that capture and translocation of seals does not work. They highlighted the difficulty in capturing the seal - specifically, that they did not have trained personnel to enable capture, and that most translocated seals generally come back to the area once released. We agree that translocation is currently not practical and can add stress to individual animals.

- *ADDs*

Many highlighted that the efficacy of ADDs is equivocal. Many said the river substrate meant that the noise would not propagate effectively. Some noted that ADDs could not be used as there was not mains power available at the stretch of river under consideration. This is incorrect; ADDs can be operated on a battery. It was unclear in many instances the level of understanding there is of the practical implementation of ADD. We would not advise on the continuous operating of ADD, instead, an ADD should be used to target particular times of greatest risk. Many made the point that the greater risk of seal predation is when the water level is low, therefore it is possible that an ADD could be targeted at the greater risk period when a seal is present in the area. ADD development is ongoing and so this option should not be automatically discounted.

Some note the potential for disturbance to non-target species, e.g. cetaceans. Whilst this is true in many circumstances, there is a low likelihood in the river environment under consideration here. In the event that disturbance was the case, we would balance the risk of temporary disturbance of protected cetaceans, against the lethal removal of protected seals.

We trust these comments are useful, but please contact [REDACTED]
[REDACTED] if you wish to discuss our comments further.

Yours sincerely

[REDACTED]

[REDACTED]

Head of Sustainable Coasts & Seas

ANNEX: Advice - by seal management unit and applicant

SOUTHWEST SCOTLAND

- SW02 – River Nith

NatureScot Consent assessment

The River Nith overlaps with the following MPAs (Table 3). We confirm that the lethal removal of **one harbour seal and one grey seal** would not have any adverse impact on the conservation objectives for the sites listed in Table 3.

Table 3 - River Nith overlapping designated sites

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
Solway Firth SAC	Atlantic salt meadows; coastal shingle vegetation outside the reach of waves; dune grassland; estuaries; glasswort and other annuals colonising mud and sand; intertidal mudflats and sandflats; reefs; river lamprey; sea lamprey; subtidal sandbanks	No
Solway Firth SPA	Bar-tailed godwit; black headed gull; common gull; common scoter; cormorant; curlew; dunlin; golden plover; goldeneye; goosander; grey plover; herring gull; knot; lapwing; oystercatcher; pink-footed goose; pintail; redthroated diver; redshank; ringed plover; sanderling; scaup; shelduck; shoveler; Svalbard barnacle goose; teal; turnstone; waterfowl assemblage; whooper swan	No
Upper Solway Flats and Marshes SSSI	Bar-tailed godwit; breeding bird assemblage; coastal geomorphology of Scotland; curlew; dunlin; golden plover; goldeneye; grey plover; knot; lower carboniferous; mineralogy of Scotland; mudflats; natterjack toad; oystercatcher; pintail; quaternary of Scotland; redshank; ringed plover; saltmarsh; sand dunes; sanderling; scaup; shelduck; shingle; Svalbard barnacle goose; vascular plant assemblage;	No
Upper Solway Flats and Marshes Ramsar site	Bar-tailed godwit; black-headed gull; common gull; cormorant; curlew; dunlin; golden plover; goldeneye; grey plover; herring gull; knot; lapwing; natterjack toad; oystercatcher; pink footed goose; pintail; redshank; ringed plover; sanderling; scaup; shelduck; shoveler; Svalbard barnacle goose; teal; turnstone; waterfowl assemblage; whooper swan	No

Licence recommendation

The River Nith is currently assessed as being a **Grade 3** river for Atlantic salmon. It is not a salmon SAC, nor within or connected to any seal SAC. This is not in a seal conservation area, nor is there any overlap with any designated seal haul out. The number of seals for which a licence is requested is **one grey seal**, and **one harbour seal**. In total five grey seals were observed in the river last year, and four predation events (grey seal) observed.

There is no detail as to how the number of seals requested is arrived at. However, the rationale put forward is that the numbers of returning salmon is now so low that seal predation has a disproportionate impact on the salmon population.

Should MSLOT be minded to permit this licence, **we confirm that the lethal removal of one grey seal and one harbour seal will not negatively affect the seal population in this area. We recommend that any licence permitted is for the lethal removal of grey seals only, due to the lack of data on any harbour seal predation.**

- **SW06 – River Shira (Argyll DSFB)**

NatureScot Consent assessment

The stretch of the River Shira specified in the licence, does not overlap with any MPA.

Licence recommendation

Although this river is a grade 3, we **recommend rejection of this licence** because there were no seals observed last year and the applicant states that the occurrence of seals in the river is rare. The licence appears to be submitted on a highly precautionary circumstances. We recommend that the applicant look again at ADDs because these can and do operate on a battery, and should be deployed when required, rather than left active continuously. The option to use an ADD should be demonstrated before lethal control is licenced.

WEST SCOTLAND

- **WS05 – River Awe (Argyll DSFB)**

NatureScot Consent assessment

The stretch of the River Awe specified in the licence, does not overlap with any MPA.

Licence recommendation

Although this river is a grade 3, we **recommend rejection of this licence** because there were no seals observed last year and the applicant states that the occurrence of seals in the river is rare. The licence appears to be submitted on a highly precautionary circumstances. We recommend that the applicant look again at ADDs because these can and do operate on a battery, and should be deployed when required, rather than left active continuously. The option to use an ADD should be demonstrated before lethal control is licenced.

- **WS05 – River Creran (Argyll DSFB)**

NatureScot Consent assessment

The stretch of the River Creran specified in the licence, does not overlap with any MPA.

Licence recommendation

Although this river is a grade 3, we **recommend rejection of this licence** because there were no seals observed last year and the applicant states that the occurrence of seals in the river is rare. The licence appears to be submitted on a highly precautionary circumstances. We recommend that the applicant look again at ADDs because these can and do operate on a battery, and should be deployed when required, rather than left active continuously. The option to use an ADD should be demonstrated before lethal control is licenced.

- **WS05 – Loch Etive (Argyll DSFB)**

NatureScot Consent assessment

The River Etive overlaps with the Glen Etive and Glen Fyne SPA (Table 4). We confirm that the lethal removal of **one harbour seal and two grey seals** would not have any adverse impact on the conservation objectives for the sites listed in Table 4. Although possible disturbance due will be short in duration and will not cause an adverse effect on site integrity. .

Table 4 - Loch Etive overlapping designated sites

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
Glen Etive and Glen Fyne SPA	Golden eagle	No

Licence recommendation

Although this river is a grade 3, we **recommend rejection of this licence** because there were no seals observed last year and the applicant states that the occurrences of seal in the river is rare. The licence appears to be submitted on a highly precautionary circumstances. We recommend that the applicant look again at ADDs because these can and do operate on a battery, and should be deployed when required rather than left active continuously. The option to use an ADD should be demonstrated before lethal control is licenced.

- **Western Isles WI18**

Grimersta Estate (river Langavat)

NatureScot Consent assessment

The River Langavat is an SAC for Atlantic salmon. We confirm that the lethal removal of **five grey seals** would not have any adverse impact on the conservation objectives for the SAC.

Licence recommendation

River Langavat is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **WI28 – Garynahine Estate (River Blackwater)**

NatureScot Consent assessment

The application may have an error in the grid reference supplied for the upstream location. Therefore, it is unclear where this may be. Dependant on the location, the river may or may not overlap with the Lewis Peatlands (Table 5) and so we include this site in our assessment for completeness. We confirm that the lethal removal of **six grey seals** would not have any adverse impact on the conservation objectives for the sites listed in Table 5.

Table 5 - River Blackwater overlapping designated sites

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
Lewis Peatlands Ramsar site	Black-throated diver; blanket bog; depressions on peat substrates; dunlin; golden eagle; golden plover; greenshank; merlin; red-throated diver; subalpine wet heath	No
Lewis Peatlands SPA	Black-throated diver; dunlin; golden eagle; golden plover; greenshank; merlin; red-throated diver	No

Licence recommendation

River Blackwater is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

ORKNEY & NORTH COAST

The population of harbour seals in the Orkney and North Coast management area has suffered a major decline of 85% in Orkney since the late 1990s⁸. The decline is continuing, there is no clear cause, and work is ongoing to better identify and understand this trend⁹. **We recommend that**

⁸ Thompson D., Duck C.D., Morris C.D., Russell D.J.F. (2018). The status of harbour seals (*Phoca vitulina*) in the UK. *Aquatic Conservation Marine Freshwater Ecosystems*, **29**(1), 40-60.

⁹ Arso Civil, M., Smout, S.C., Duck, C., Morris, C., Cummings, C., Langley, I., Law, A., Morton, C., Brownlow, A., Davison, N., Doeschate, M., Lacaze, J-P., McConnell, B., Hall, A.J. (2018). *Harbour Seal Decline – vital rates and drivers*. Report to Scottish Government HSD2. <https://marine.gov.scot/sma/content/harbour-seal-decline-vital-rates-and-drivers-report-scottish-government-hsd2>

licences for the lethal removal of harbour seals in the Orkney and North Coast Management Area are rejected due to the continued population decline of this species in these areas.

- **ONC05 – River Halladale**

NatureScot Consent assessment

The River Halladale overlaps with the Strathy Coast SSSI (Table 6). We confirm that the lethal removal of **two harbour seal and four grey seals** would not have an adverse impact on the site management of this SSSI (Table 6).

Table 6 – River Halladale overlapping designated site

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
Strathy Coast SSSI	Machair; maritime cliff; moine; saltmarsh; sand dunes; vascular plant assemblage	No

Licence recommendation

River Halladale is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **ONC08 – River Naver SAC**

NatureScot Consent assessment

The River Naver is an SAC for Atlantic salmon. We confirm that the lethal removal of **one harbour seal and one grey seal** would not have any adverse impact on the conservation objectives for the SAC.

Licence recommendation

River Naver is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

MORAY FIRTH

Total lethal removal requested for this seal management unit is **8 harbour seals and 30 grey seals**. The PBR (Table 2) for this area for harbour seals is 6.

The population of harbour seals in the Moray Firth declined at a rate of 5.6% p.a. between 1994 and 2000, followed by a step change with a drop of ~ 28% occurring between 2000 and 2003, with

no significant trend thereafter¹⁰. There is no evidence of a continued decline, but neither is there any sign of recovery¹¹. The Moray Firth SMA is also a harbour seal Conservation Area, as designated under the Marine (Scotland) Act 2010. The majority of harbour seals are observed between Culbin and Findhorn. The harbour seal population in the Dornoch Firth and Morrich More SAC are currently classed as declining. All applications, bar the River Spey and the River Deveron are within the 50km connectivity buffer for the Dornoch Firth and Morrich More SAC. Any permitted shooting would therefore trigger Likely Significant Effect, and an appropriate assessment would need to be undertaken.

The grey seal population on the east coast in Scottish waters is still increasing, but at a much smaller rate than those populations on the east coast in English waters.

We therefore recommend that licences for the lethal removal of harbour seals in the East Coast Management Area are rejected due to the continued population decline of this species in these areas.

- **MF01 – River Carron**

NatureScot Consent assessment

River Carron does not overlap with any protected sites, however the downstream location is next to the boundary with the Dornoch Firth and Morrich More SAC for harbour seals.

Licence recommendation

The River Carron is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **MF01 – River Deveron**

NatureScot Consent assessment

No overlap with any protected sites.

Licence recommendation

The River Deveron has grade 2 conservation status. There were no sightings of seals last year due to Covid restrictions, however, sightings were logged between 2015 and 2019 with the greatest number in 2015 of 11 grey seals and two harbour seals. This licence applies for the lethal removal of **six grey seals and two harbour seals.**

The applicant does not intend to try ADDs. There are a number of ADDs on the market and we recommend that they fully investigate an appropriate ADD for use in the river. Leaving the ADD active continuously is not good practice; rather it is better to target the problem seal when it is

¹⁰ Thompson D., Duck C.D., Morris C.D., Russell D.J.F. (2018). The status of harbour seals (*Phoca vitulina*) in the UK. *Aquatic Conservation Marine Freshwater Ecosystems*, **29**(1), 40-60.

¹¹ <http://www.smru.st-andrews.ac.uk/scos/scos-reports/>

present. This should be attempted prior to shooting the seal. The use should be logged, with detail of how deployed and the result of the deployment. To note, any carcass should be reported to SMASS rather than SMRU. MSLOT should also consider restricting the catching (including catch and release) of salmon, as this may also be a pressure on the salmon stock.

We recommend the application for lethal control of harbour seals is rejected.

If MSLOT is minded to permit the lethal removal of grey seals, **we confirm that the removal of six grey seals will not have an adverse effect on the East coast population of grey seals.**

- **MF01 – River Findhorn**

NatureScot Consent assessment

The River Findhorn overlaps with the following MPAs (Table 7). Some protected features connected to the river location are susceptible to disturbance (see Moray and Nairn Coast Ramsar site and Moray and Nairn Coast SPA). Therefore, the lethal removal of **one harbour seal and nine grey seals** may have an adverse impact on the conservation objectives for these sites.

Table 7 - River Findhorn overlapping protected sites

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
Lower Findhorn Woods SAC	Mixed woodland on base-rich soils associated with rocky slopes	No
Lower Findhorn Woods SSSI	Bryophyte assemblage; lichen assemblage; oligotrophic river/stream; upland mixed ash woodland; upland oak woodland; wet woodland	No
Moray and Nairn Coast Ramsar site	Greylag goose; intertidal mudflats and sandflats; pink footed goose; redshank; saltmarsh; sand dunes; wet woodland; shingle; waterfowl assemblage	Disturbance to greylag goose (declining)
Moray and Nairn Coast SPA	Bar-tailed godwit; Dunlin; Greylag goose; osprey; oystercatcher; pink-footed goose; red-breasted merganser; Redshank; waterfowl assemblage; wigeon	Disturbance to all species, particularly declining – water fowl; redshank; pinkfooted goose; greylag goose; bar-tailed godwit
Culbin Sands, Culbin Forest and Findhorn Bay SSSI	Coastal geomorphology of Scotland; fungi assemblage; hydromorphological mire range; invertebrate assemblage; lichen assemblage; mesotrophic loch; saltmarsh; sand dunes; shingle; vascular plant assemblage	No

Licence recommendation

The River Findhorn is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **MF01 – River Oykel (SAC)**

NatureScot Consent assessment

The River Oykel overlaps with the following MPAs (Table 8). We confirm that the lethal removal of **one harbour seal and four grey seals** would not have any adverse impact on the conservation objectives for the sites listed in Table 8.

Table 8 - River Oykel overlapping protected sites

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
River Oykel SAC	Atlantic Salmon; freshwater pearl mussel	No
Kyle of Sutherland Marshes SSSI	Flood-plain fen; vascular plant assemblage	No

Licence recommendation

River Oykel is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **MF01 – River Shin**

NatureScot Consent assessment

The River Shin overlaps with the following MPAs (Table 9). We confirm that the lethal removal of **one harbour seal and two grey seals** would not have any adverse impact on the conservation objectives for the sites listed in Table 9.

Table 9 – River Shin overlapping protected sites

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
River Oykel SAC	Atlantic Salmon; freshwater pearl mussel	No
Kyle of Sutherland Marshes SSSI	Flood-plain fen; vascular plant assemblage	No

Licence recommendation

River Shin is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **MF01 – River Spey**

NatureScot Consent assessment

The River Spey overlaps with the following MPAs (Table 10). Some protected features connected to the river location are susceptible to disturbance (see Moray and Nairn Coast Ramsar site and Moray and Nairn Coast SPA). Therefore, the lethal removal of **one harbour seal and five grey seals** may have any adverse impact on the conservation objectives for these sites.

Table 10 – River Spey overlapping protected areas.

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
Moray and Nairn Coast Ramsar	Greylag goose; intertidal mudflats and sandflats; pink footed goose; redshank; saltmarsh; sand dunes; wet woodland shingle; waterfowl assemblage	Disturbance to greylag goose (declining)
Lower river Spey – Spey Bay SAC	Alder woodland on floodplains; coastal shingle vegetation outside reach of waves	No
River Spey SAC	Atlantic salmon; freshwater pearl mussel; otter; sea lamprey	No
Moray and Nairn coast SPA	Bar-tailed godwit; Dunlin; Greylag goose; osprey; oystercatcher; pink-footed goose; red-breasted merganser; Redshank; waterfowl assemblage; widgeon	Disturbance to all species, particularly declining – water fowl; redshank; pinkfooted goose; greylag goose; bar-tailed godwit
Lower river Spey SSSI	Fluvial geomorphology of Scotland; River shingle/sand; wet woodland	No
River Spey SSSI	Atlantic salmon; freshwater pearl mussel; otter; sea lamprey	No
Anagach woods SPA	Capercaillie	Disturbance (unfavourable declining)

Licence recommendation

River Spey is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **MF01 - River Ness**

NatureScot Consent assessment

No overlap with any protected sites.

Licence recommendation

The River Ness has grade 2 conservation status. Both harbour and grey seals have been observed in the river, and observed predating salmon. The supporting information states that harbour seals have been observed taking up residence in the river, and seal presence in general is related to the water level (most at high water). The applicant provides opinion that an ADD tried in the area was ineffective. The licence application is for two grey seals and one harbour seal. We recommend that further attempts with ADDs are not dismissed and should be tried before any seal is shot.

We recommend the application for harbour seals is rejected.

If MSLOT is minded to permit the lethal removal of grey seals, **we confirm that the removal of two grey seals will not have an adverse effect on the East coast population of grey seals.**

EAST SCOTLAND

We recommend that licences for the lethal removal of harbour seals in the East Coast Management Area are rejected due to the continued population decline of this species¹² in these areas.

- **EC06 - Tay DSFB**

NatureScot Consent assessment

We confirm that the lethal removal of **five grey seals and one harbour seal** by shooting will not have any adverse impact on the conservation objectives for the sites listed in Table 11.

Table 11 – River Tay overlap with protected sites

MPA	Protected feature	Does the lethal removal of seals by shooting have any negative impact on these sites' conservation objectives
River Tay SAC	Atlantic salmon, brook lamprey, aquatic vegetation, otter, river lamprey, sea Lamprey	No

¹² Thompson D., Duck C.D., Morris C.D., Russell D.J.F. (2018). The status of harbour seals (*Phoca vitulina*) in the UK. *Aquatic Conservation Marine Freshwater Ecosystems*, **29**(1), 40-60.

Licence recommendation

River Tay is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

- **EC07 - River Ythan**

NatureScot Consent assessment

No overlap with any protected sites.

Licence recommendation

The River Ythan is grade 3 conservation status. This application is in close proximity to the seal haul out at the mouth of the estuary. This seal haul out is a Designated seal haul-out and both species of seals are legally protected from harassment within the haul out itself. This application raises issues around the lethal control on seals in the river that will clearly be using the designated site to haul out. There can be c 3000 seals present at this haul-out. The applicant is recording 50 to 100 + seals in the river. The application is for six grey seals.

We would advise against approval due to the proximity to the Ythan designated haul-out.

If however MSLOT is minded to permit the lethal removal of grey seals, we advise that the downstream limit (currently Logie Buchan Bridge) should be moved upstream and so further away from the haul-out, for example to the other side of Ellon.

Should the licence be granted, **we confirm that the removal of six grey seals will not have an adverse effect on the East coast population of grey seals.**

- **EC23 - Park Fishery – River Dee**

NatureScot Consent assessment

We confirm that the lethal removal of **three grey seals and one harbour seal** by shooting will not have any adverse impact on the conservation objectives for the sites listed in Table 12.

Table 12 - River Dee overlapping protected features

MPA	Protected Features	Does the lethal removal of seals by shooting have any negative impact on these sites conservation objectives
River Dee SAC	Atlantic salmon; freshwater pearl; otter	No

Licence recommendation

River Dee is a grade 1 river and therefore our advice is that this application **should be rejected because the stock is classed as being at a good conservation status, and therefore the lethal removal of a few individual seals is not necessary for the conservation of salmon.**

Comments on Applications for Licences to shoot seals in 2022 provided by the Sea Mammal Research Unit, Scottish Oceans Institute, University of St Andrews.

Potential Biological Removal (PBR) values for 2022

The PBR includes all forms of anthropogenic mortality. There is some bycatch of seals of both species in North Sea fisheries and elsewhere, the level of which is unknown.

Table 1. Potential Biological Removal (PBR) values for grey seals in Scotland by Seal Management Unit for the year 2022.

Seal Management Area	2016-2019		PBRs based on recovery factors F_R ranging from 0.1 to 1.0										selected	
	count	N_{min}	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1.0	F_R	PBR
1 Southwest Scotland	517	1,927.0	12	23	35	46	58	69	81	92	104	116	1.0	116
2 West Scotland	4,174	15,554	93	187	280	373	467	560	653	747	840	933	1.0	933
2a West Scotland - Sou	2,922	10,888												653
2b West Scotland - Cer	773	2,880												173
2c West Scotland - Noi	479	1,785												107
3 Western Isles	5,773	21,512	129	258	387	516	645	774	904	1,033	1,162	1,291	1.0	1,291
4 North Coast & Orkney	8,599	32,043	192	385	577	769	961	1,154	1,346	1,538	1,730	1,923	1.0	1,923
4a North Coast	414	1,543												93
4b Orkney	8,185	30,500												1,830
5 Shetland	1,009	3,760	23	45	68	90	113	135	158	180	203	226	1.0	226
6 Moray Firth	1,657	6,175	37	74	111	148	185	222	259	296	333	370	1.0	370
7 East Scotland	3,683	13,724	82	165	247	329	412	494	576	659	741	823	1.0	823
SCOTLAND TOTAL	25,412	94,695	568	1,137	1,705	2,271	2,841	3,408	3,977	4,545	5,113	5,682		5,682

$$PBR = N_{min} (R_{max}/2) F_R$$

where: **PBR** is a number of animals considered safely removable from the population.

N_{min} is a minimum population estimate. A revised analysis of GPS/GSM telemetry data from 60 grey seals, tagged between 2005 and 2018, allowed more accurate identification of haulout times (SCOS-BP 21/02). The revised estimate of proportion of seals hauled out during the survey window was 25.2% (95% CI: 21.5 – 29.1%), compared with the previous estimate of 23.9% (95% CI: 19.2 – 28.6%) (SCOS-BP 16/03). The 20th centile of the distribution of scalars from counts to abundances derived from the revised estimate is 3.73, approximately 3.5% lower than the previous scalar (3.86).

R_{max} is the population growth rate at low densities (by default set 0.12 for pinnipeds), this is halved to give an estimate of the growth rate at higher populations. This estimate should be conservative for most populations at their OSP.

Table 2. Potential Biological Removal (PBR) values for harbour seals in Scotland by Seal Management Unit for the year 2022.

Seal Management Area	2016-2019		PBRs based on recovery factors F_R ranging from 0.1 to 1.0										selected	
	count	N_{min}	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1.0	F_R	PBR
1 Southwest Scotland	1,709	1,709	10	20	30	41	51	61	71	82	92	102	0.7	71
2 West Scotland	15,600	15,600	93	187	280	374	468	561	655	748	842	936	1.0	936
2a West Scotland - Sou	7,069	7,069												424
2b West Scotland - Cer	7,447	7,447												447
2c West Scotland - Noi	1,084	1,084												65
3 Western Isles	3,532	3,532	21	42	63	84	105	127	148	169	190	211	0.5	105
4 North Coast & Orkney	1,405	1,405	8	16	25	33	42	50	59	67	75	84	0.1	8
4a North Coast	109	109												1
4b Orkney	1,296	1,296												7
5 Shetland	3,180	3,180	19	38	57	76	95	114	133	152	171	190	0.1	19
6 Moray Firth	1,077	1,077	6	12	19	25	32	38	45	51	58	64	0.1	6
7 East Scotland	343	343	2	4	6	8	10	12	14	16	18	20	0.1	2
SCOTLAND TOTAL	26,846	26,846	159	319	480	641	803	963	1,125	1,285	1,446	1,607		1,147

$$PBR = N_{min} (R_{max}/2) F_R$$

where: **PBR** is a number of animals considered safely removable from the population.

N_{min} is a minimum population estimate (counts were used directly as values for N_{min}).

R_{max} is the population growth rate at low densities (by default set 0.12 for pinnipeds), this is halved to give an estimate of the growth rate at higher populations. This estimate should be conservative for most populations at their Optimum Sustainable Population (OSP).

F_R is a recovery factor, usually in the range 0.1 to 1. Low recovery factors give some protection from stochastic effects and overestimation of the other parameters. They also increase the expected equilibrium population size under the PBR.

Total number of animals requested by Seal Management Areas

The total numbers of grey seals requested by Seal Management Area are well below the PBR for these SMAs. This is also true for harbour seals in the three SMAs in western Scotland. However, in North Coast & Orkney, Moray Firth, and East Scotland the number of harbour seals requested are either higher than, equal to, or only slightly lower than the PBR values.

Table 3. Summary of the number of animals requested by applicant and by Seal Management Area (SMA), compared to the PBR values for each SMA. The yellow cells highlight values that are close to or above the PBR.

Seal Management Area	Applicant	No. of rivers	Requested		PBR		
			Hg	Pv	Hg	Pv	
Southwest Scotland	SW02	1	1	1			
Southwest Scotland	SW06	1	2	1			
Southwest Scotland			3	2	116	71	
West Scotland	WS05	3	6	3			
West Scotland			6	3	933	936	*
Western Isles	WI18	1	5	0			
Western Isles	WI28	1	6	0			
Western Isles			11	0	1,291	105	
North Coast & Orkney	ONC05	1	4	2			
North Coast & Orkney	ONC08	1	1	1			
North Coast & Orkney			5	3	1,923	8	*
Moray Firth	MF01	7	30	8			
Moray Firth			30	8	370	6	
East Scotland	EC06	1	5	1			
East Scotland	EC07	1	6	0			
East Scotland	EC23	1	3	1			
East Scotland			14	2	823	2	
TOTAL			69	18			

* Split up by SMA subdivision (based on the proportions of the most recent count) the PBRs for West Scotland – South are: 653Hg & 424Pv, for North Coast they are: 93Hg & 1Pv.

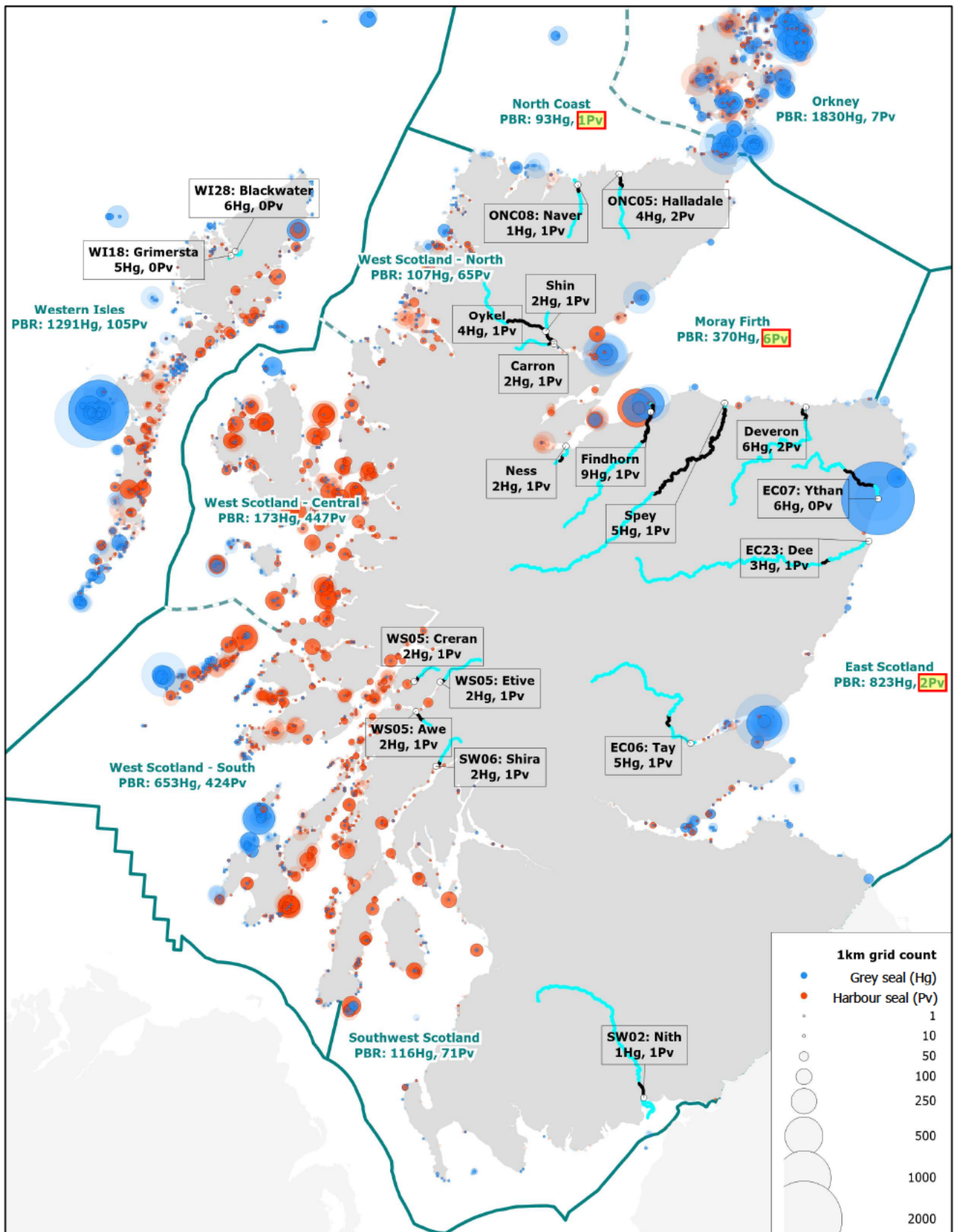


Figure 1. Text boxes indicate applicant (except for Moray Firth where all MF01), river name, and number of animals requested. The PBRs for each Seal Management Area (SMA) are shown with the SMA labels (PBRs for West Scotland and North Coast & Orkney are split up by subdivisions to reflect the proportion of animals counted in each subdivision). The low PBR values for the North Coast and the two eastern SMAs are highlighted. Seal counts from five full censuses are also shown, with the most recent counts (2016-2019) displayed more prominently on top of the older counts.

Individual applicants

The following tables summarise the number of animals requested by each applicant together with the totals for the given SMA (subdivision) and the relevant PBR values. For comparison, the equivalent numbers for the five previous licence periods are also provided, as well as the number of animals granted and shot in those licence periods. Where the number requested is close to the PBR for the SMA (subdivision) the relevant cells are highlighted in yellow. Additional comments may be added to highlight further points of interest.

Southwest Scotland

Seal Management Area: Southwest Scotland													
Applicant: SW02 Nith District Salmon Fishery Board													
River(s)	Grade	Grey seals						Harbour seals					
		2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Nith	3						1						1
Applied for		1	1	1	1	1	1	1	1	1	1	1	1
Granted		1	1	1	1	0	-	1	1	1	1	0	-
Shot		0	0	0	0	0	-	0	0	0	0	0	-
SMA													
<u>Southwest Scotland</u>													
No. of applicants		4	4	4	4	1	2	4	4	4	4	1	2
Applied for		54	32	30	30	1	3	78	47	28	28	1	2
Granted		12	12	12	11	0	-	13	13	13	13	0	-
Shot		1	0	2	7	0	-	0	2	1	8	0	-
PBR		57	86	86	119	119	116	50	50	50	71	71	71
Most recent count		374	374	374	517	517	517	1,200	1,200	1,200	1,709	1,709	1,709
Years counted		(2015)	(2015)	(2015)	(2018)	(2018)	(2018)	(2015)	(2015)	(2015)	(2018)	(2018)	(2018)
Trend		Stable						Stable/ increasing					

Seal Management Area: Southwest Scotland													
Applicant: SW06 Argyll District Salmon Fisheries Board													
River(s)	Grade	Grey seals						Harbour seals					
		2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Shira	3						2						1
Applied for		5	5	3	3	0	2	10	10	3	3	0	1
Granted		3	3	3	3	0	-	3	3	3	3	0	-
Shot		0	0	0	0	0	-	0	0	0	0	0	-
SMA													
<u>Southwest Scotland</u>													
No. of applicants		4	4	4	4	1	2	4	4	4	4	1	2
Applied for		54	32	30	30	1	3	78	47	28	28	1	2
Granted		12	12	12	11	0	-	13	13	13	13	0	-
Shot		1	0	2	7	0	-	0	2	1	8	0	-
PBR		57	86	86	119	119	116	50	50	50	71	71	71
Most recent count		374	374	374	517	517	517	1,200	1,200	1,200	1,709	1,709	1,709
Years counted		(2015)	(2015)	(2015)	(2018)	(2018)	(2018)	(2015)	(2015)	(2015)	(2018)	(2018)	(2018)
Trend		Stable						Stable/ increasing					

West Scotland

Seal Management Area: West Scotland													
SMA subdivision: West Scotland - South													
Applicant: WS05 Argyll District Salmon Fisheries Board													
		Grey seals						Harbour seals					
River(s)	Grade	2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Awe	3						2						1
River Creran	3						2						1
River Etive	3						2						1
Applied for		5	5	2	2	0	6	10	10	5	5	0	3
Granted		2	2	2	2	0	-	5	5	5	5	0	-
Shot		0	0	0	0	0	-	0	0	0	0	0	-
SMA													
West Scotland													
No. of applicants		14	15	15	15	0	1	16	16	16	16	1	1
Applied for		182	187	171	181	0	6	204	209	196	206	6	3
Granted		64	59	59	59	0	-	81	72	72	70	0	-
Shot		11	11	11	10	0	-	16	20	13	28	0	-
PBR		777	1,172	1,219	966	966	933	637	637	953	936	936	936
Most recent count		5,064	5,064	5,267	4,174	4,174	4,174	15,184	15,184	15,889	15,600	15,600	15,600
Years counted		(2013-2015)	(2013-2015)	(2014-2015; 2017)	(2014; 2017-2018)	(2014; 2017-2018)	(2014; 2017-2018)	(2013-2015)	(2013-2015)	(2014-2015; 2017)	(2014; 2017-2018)	(2014; 2017-2018)	(2014; 2017-2018)
Trend		Stable? (no clear trend)						Increasing/ stable					
SMA subdivision													
West Scotland - South													
No. of applicants		6	7	7	7	0	1	7	7	7	7	0	1
Applied for		34	39	38	38	0	6	45	47	37	37	0	3
Granted		18	17	17	17	0	-	31	29	29	27	0	-
Shot		1	1	0	1	0	-	2	0	1	5	0	-
PBR		555	837	837	676	676	653	321	321	459	424	424	424
Most recent count		3,618	3,618	3,618	2,922	2,922	2,922	7,645	7,645	7,645	7,069	7,069	7,069
Years counted		(2014-2015)	(2014-2015)	(2014-2015)	(2018)	(2018)	(2018)	(2014-2015)	(2014-2015)	(2014-2015)	(2018)	(2018)	(2018)
Trend		Stable? (no clear trend)						Increasing/ stable					

Although no animals were reported as being shot in 2017-2021, this applicant has increased the total number of grey seals in this year's applications. This may be because, in previous years, multiple rivers were covered by a single licence, and the number of animals granted on a licence could be shot wherever deemed necessary by the applicant. With the new licensing system, each licence covers only one river, which means that the total numbers requested by an applicant are likely to rise in order to allow shooting at each river location.

Western Isles

Seal Management Area: Western Isles													
Applicant:		WI18 Grimersta Estate (Fishery)											
River(s)	Grade	Grey seals						Harbour seals					
		2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
Grimersta River	1						5						0
Applied for		3	3	6	6	6	5	0	0	0	0	0	0
Granted		2	2	2	2	0	-	0	0	0	0	0	-
Shot		0	2	0	0	0	-	0	0	0	0	0	-
SMA													
Western Isles													
No. of applicants		10	10	10	12	3	2	8	8	9	9	0	0
Applied for		173	153	161	177	19	11	65	76	65	66	0	0
Granted		43	43	47	47	0	-	17	17	20	17	0	-
Shot		14	9	23	10	0	-	3	2	8	6	0	-
PBR		620	941	1,336	1,336	1,336	1,291	82	82	105	105	105	105
Most recent count		4,038	4,065	5,772	5,772	5,773	5,773	2,739	2,739	3,533	3,533	3,532	3,532
Years counted		(2008; 2011)	(2011; 2014)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2008; 2011; 2014)	(2011; 2014)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)
Trend		Stable/ increasing						Recovered after 25% decline between 2000-2008; Stable/ increasing					

Seal Management Area: Western Isles													
Applicant:		WI28 Garrynahine Estate											
River(s)	Grade	Grey seals						Harbour seals					
		2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Blackwater	1						6						0
Applied for		0	0	0	8	8	6	0	0	0	0	0	0
Granted		0	0	0	2	0	-	0	0	0	0	0	-
Shot		0	0	0	0	0	-	0	0	0	0	0	-
SMA													
Western Isles													
No. of applicants		10	10	10	12	3	2	8	8	9	9	0	0
Applied for		173	153	161	177	19	11	65	76	65	66	0	0
Granted		43	43	47	47	0	-	17	17	20	17	0	-
Shot		14	9	23	10	0	-	3	2	8	6	0	-
PBR		620	941	1,336	1,336	1,336	1,291	82	82	105	105	105	105
Most recent count		4,038	4,065	5,772	5,772	5,773	5,773	2,739	2,739	3,533	3,533	3,532	3,532
Years counted		(2008; 2011)	(2011; 2014)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2008; 2011; 2014)	(2011; 2014)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)	(2011; 2014; 2017)
Trend		Stable/ increasing						Recovered after 25% decline between 2000-2008; Stable/ increasing					

North Coast & Orkney

Seal Management Area: North Coast & Orkney													
SMA subdivision: North Coast													
Applicant: ONC05 Strath Halladale Partnership													
		Grey seals						Harbour seals					
River(s)	Grade	2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Halladale	1						4						2
Applied for		15	15	20	20	6	4	1	1	0	0	4	2
Granted		10	8	8	8	0	-	0	0	0	0	0	-
Shot		2	4	4	0	0	-	0	0	0	0	0	-
SMA													
North Coast & Orkney													
No. of applicants		7	7	7	7	3	2	5	5	4	4	2	2
Applied for		128	131	120	123	10	5	13	13	10	10	6	3
Granted		56	47	47	45	0	-	0	0	0	0	0	-
Shot		3	10	12	10	0	-	0	0	0	0	0	-
PBR		1,245	2,249	2,249	2,249	1,991	1,923	11	8	8	8	8	8
Most recent count		8,106	9,714	9,714	9,714	8,599	8,599	1,938	1,349	1,349	1,349	1,405	1,405
Years counted		(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016; 2019)	(2016; 2019)	(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016; 2019)	(2014; 2016; 2019)
Trend		Stable						Declining or flat after large decrease					
SMA subdivision													
North Coast													
No. of applicants		5	5	5	5	3	2	3	3	2	2	2	2
Applied for		83	86	84	86	10	5	8	8	7	7	6	3
Granted		34	29	29	29	0	-	0	0	0	0	0	-
Shot		2	8	7	4	0	-	0	0	0	0	0	-
PBR		41	96	96	96	96	93	0	1	1	1	1	1
Most recent count		266	414	414	414	414	414	73	109	109	109	109	109
Years counted		(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016)	(2016)	(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016)	(2014; 2016)
Trend		Stable						Declining or flat after large decrease					

Although the 2019 harbour seal count for Orkney - that has seen an 85% decline since 1997 - was slightly higher than in 2016, this does not necessarily signify the end of the decline. The PBR value for harbour seals in the North Coast & Orkney SMA remains very low (8). The two applications for this SMA are for rivers in the North Coast subdivision, whereas most animals in this SMA are found in Orkney. The proportional PBR for the North Coast subdivision is 1 harbour seal, which is lower than the 3 harbour seals requested in total.

Seal Management Area: North Coast & Orkney													
SMA subdivision: North Coast													
Applicant: ONC08 River Naver Fisheries													
		Grey seals					Harbour seals						
<u>River(s)</u>	<u>Grade</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>
River Naver	1						1						1
Applied for		5	10	3	3	1	1	2	2	2	2	2	1
Granted		3	3	3	3	0	-	0	0	0	0	0	-
Shot		0	1	1	0	0	-	0	0	0	0	0	-
SMA													
North Coast & Orkney													
No. of applicants		7	7	7	7	3	2	5	5	4	4	2	2
Applied for		128	131	120	123	10	5	13	13	10	10	6	3
Granted		56	47	47	45	0	-	0	0	0	0	0	-
Shot		3	10	12	10	0	-	0	0	0	0	0	-
PBR		1,245	2,249	2,249	2,249	1,991	1,923	11	8	8	8	8	8
Most recent count		8,106	9,714	9,714	9,714	8,599	8,599	1,938	1,349	1,349	1,349	1,405	1,405
Years counted		(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016; 2019)	(2016; 2019)	(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016; 2019)	(2014; 2016; 2019)
Trend		Stable					Declining or flat after large decrease						
SMA subdivision													
North Coast													
No. of applicants		5	5	5	5	3	2	3	3	2	2	2	2
Applied for		83	86	84	86	10	5	8	8	7	7	6	3
Granted		34	29	29	29	0	-	0	0	0	0	0	-
Shot		2	8	7	4	0	-	0	0	0	0	0	-
PBR		41	96	96	96	96	93	0	1	1	1	1	1
Most recent count		266	414	414	414	414	414	73	109	109	109	109	109
Years counted		(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016)	(2016)	(2013)	(2014; 2016)	(2016)	(2014; 2016)	(2014; 2016)	(2014; 2016)
Trend		Stable					Declining or flat after large decrease						

Moray Firth

Seal Management Area: Moray Firth													
Applicant: MF01 Moray Firth Seal Management Group													
		Grey seals						Harbour seals					
River(s)	Grade	2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Carron	1						2						1
River Deveron	2						6						2
River Findhorn	1						9						1
River Ness	2						2						1
River Oykel	1						4						1
River Shin	1						2						1
River Spey	1						5						1
Applied for		40	40	40	40	40	30	6	6	6	6	1	8
Granted		18	18	18	18	0	-	0	0	0	0	0	-
Shot		15	18	18	13	0	-	0	0	0	0	0	-
SMA													
<u>Moray Firth</u>													
No. of applicants		1	1	1	1	1	1	1	1	1	1	1	1
Applied for		40	40	40	40	40	30	6	6	6	6	1	8
Granted		18	18	18	18	0	-	0	0	0	0	0	-
Shot		15	18	18	13	0	-	0	0	0	0	0	-
PBR		294	289	275	178	383	370	4	5	5	5	6	6
Most recent count		1,917	1,252	1,189	769	1,657	1,657	745	940	879	962	1,077	1,077
Years counted		(2008; 2011; 2013; 2015)	(2008; 2011; 2016)	(2008; 2011; 2016; 2017)	(2008; 2011; 2016; 2018)	(2016; 2019)	(2016; 2019)	(2008; 2011; 2013; 2015)	(2008; 2011; 2016)	(2008; 2011; 2016; 2017)	(2008; 2011; 2016; 2018)	(2016; 2019)	(2016; 2019)
Trend		Stable						Stable					

This applicant has decreased the total number of grey seals in this year's applications, but increased the total number of harbour seals requested. This increase may be because, in previous years, multiple rivers were covered by a single licence, and the number of animals granted on a licence could be shot wherever deemed necessary by the applicant. With the new licensing system, each licence covers only one river, which means that the total numbers requested by an applicant are likely to rise in order to allow shooting at least one animal at each river location if required.

The harbour seal PBR for the Moray Firth SMA is set at 6 and is lower than the number of harbour seals requested.

East Coast

Seal Management Area: East Scotland													
Applicant: EC06 Tay District Salmon Fisheries Board													
		Grey seals						Harbour seals					
River(s)	Grade	2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Tay	1						5						1
Applied for		5	5	5	5	5	5	3	3	3	3	1	1
Granted		3	3	3	3	0	-	0	0	0	0	0	-
Shot		0	1	0	1	0	-	0	0	0	0	0	-
SMA													
<u>East Scotland</u>													
No. of applicants		5	4	4	5	3	3	4	3	3	4	2	2
Applied for		33	21	21	24	11	14	9	10	10	10	2	2
Granted		14	12	12	14	0	-	0	0	0	0	0	-
Shot		2	1	1	1	0	-	0	0	0	0	0	-
PBR		352	882	845	871	852	823	1	2	2	2	2	2
Most recent count		2,296	3,812	3,652	3,762	3,683	3,683	224	368	346	342	343	343
Years counted		(2013; 2015)	(2013; 2015; 2016)	(2013; 2015; 2017)	(2016; 2018)	(2016; 2018; 2019)	(2016; 2018; 2019)	(2013; 2015)	(2013; 2015; 2016)	(2013; 2015; 2017)	(2016; 2018)	(2016; 2018; 2019)	(2016; 2018; 2019)
Trend		Stable / Increasing in some areas						Significant decline between 2002-2014; stable at lower level since					

Seal Management Area: East Scotland		Applicant: EC07 Ythan District Salmon Fishery Board											
River(s)	Grade	Grey seals					Harbour seals						
		2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Ythan	3												
Applied for		16	8	8	8	0	6	0	0	0	0	0	0
Granted		3	3	3	3	0	-	0	0	0	0	0	-
Shot		1	0	0	0	0	-	0	0	0	0	0	-
SMA													
East Scotland													
No. of applicants		5	4	4	5	3	3	4	3	3	4	2	2
Applied for		33	21	21	24	11	14	9	10	10	10	2	2
Granted		14	12	12	14	0	-	0	0	0	0	0	-
Shot		2	1	1	1	0	-	0	0	0	0	0	-
PBR		352	882	845	871	852	823	1	2	2	2	2	2
Most recent count		2,296	3,812	3,652	3,762	3,683	3,683	224	368	346	342	343	343
Years counted		(2013; 2015)	(2013; 2015; 2016)	(2013; 2015; 2017)	(2016; 2018)	(2016; 2018; 2019)	(2016; 2018; 2019)	(2013; 2015)	(2013; 2015; 2016)	(2013; 2015; 2017)	(2016; 2018)	(2016; 2018; 2019)	(2016; 2018; 2019)
Trend		Stable / Increasing in some areas					Significant decline between 2002-2014; stable at lower level since						

Seal Management Area: East Scotland		Applicant: EC23 Park Fishery (Park Farms)											
River(s)	Grade	Grey seals					Harbour seals						
		2017	2018	2019	2020	2021	2022	2017	2018	2019	2020	2021	2022
River Dee	1												
Applied for		0	0	0	0	3	3	0	0	0	0	1	1
Granted		0	0	0	0	0	-	0	0	0	0	0	-
Shot		0	0	0	0	0	-	0	0	0	0	0	-
SMA													
East Scotland													
No. of applicants		5	4	4	5	3	3	4	3	3	4	2	2
Applied for		33	21	21	24	11	14	9	10	10	10	2	2
Granted		14	12	12	14	0	-	0	0	0	0	0	-
Shot		2	1	1	1	0	-	0	0	0	0	0	-
PBR		352	882	845	871	852	823	1	2	2	2	2	2
Most recent count		2,296	3,812	3,652	3,762	3,683	3,683	224	368	346	342	343	343
Years counted		(2013; 2015)	(2013; 2015; 2016)	(2013; 2015; 2017)	(2016; 2018)	(2016; 2018; 2019)	(2016; 2018; 2019)	(2013; 2015)	(2013; 2015; 2016)	(2013; 2015; 2017)	(2016; 2018)	(2016; 2018; 2019)	(2016; 2018; 2019)
Trend		Stable / Increasing in some areas					Significant decline between 2002-2014; stable at lower level since						

Two of the three applicants in the East Scotland SMA have requested a licence to shoot one harbour seal. The harbour seal population in East Scotland has declined significantly since the early 2000s. The average count for the Firth of Tay & Eden Estuary SAC since 2013 (43) is 94% lower than the highest count made in 1992 (773). The harbour seal PBR for East Scotland is set at 2.

General notes

Identification of seals

It is important that the Applicant is able to differentiate the two species of seal with confidence, especially given the state of the harbour seal population on the east coast and in the Northern Isles of Scotland.

Photographs should be taken of seals thought to be feeding on salmon, in order to identify specialist individuals that repeatedly return to a river to predate on salmon. Only once a specialist seal has been identified and no other methods are successful in deterring this individual should the applicant consider making use of a licence to kill a seal.

Carcass recovery

Every effort should be made to recover the carcasses of any seals that have been shot. Fresh carcasses can provide valuable data on diet, condition, and life history parameters. Please contact either SMRU or the Scottish Marine Animal Stranding Scheme at the University of Glasgow.