



Association of  
Salmon Fishery Boards



## Comments on 'SEA Screening and Scoping Report for the Sectoral Marine Plan for Wave and Tidal Energy in Scotland's Renewable Energy Zone' September 2011

### Introduction

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFBs operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of Salmon Conservation Regulations. ASFB creates policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling. An analysis completed in 2004 demonstrated that freshwater angling in Scotland results in the Scottish economy producing over £100 million worth of annual output, which supports around 2,800 jobs and generates nearly £50million in wages and self-employment into Scottish households, most of which are in rural areas.

Formed in 2005, Rivers and Fisheries Trusts of Scotland (RAFTS) is an independent freshwater conservation charity representing Scotland's national network of 24 rivers and fisheries Trusts and Foundations. Our members work across over 90% of Scotland's freshwaters to protect and develop our native fish stocks and populations by undertaking a range of activities including freshwater, river habitat restoration, fish and fisheries monitoring, research and education programmes. RAFTS is the membership organisation of the fisheries and rivers trusts operating in Scotland and is, itself, a charity and company limited by guarantee.

We welcome the opportunity to comment on the SEA Screening and Scoping Report for the Sectoral Marine Plan for Wave and Tidal Energy in Scotland's Renewable Energy Zone. We are largely content with the approach taken in this document, subject to the specific points detailed below.

### Overarching Comments

- We would emphasise that District Salmon Fishery Boards have statutory responsibility to protect and improve salmon and sea trout fisheries. As statutory consultees, it is therefore important that DSFBs are consulted at the earliest possible stage in the process as individual developments progress.
- We believe that the approach set out in the Screening and Scoping report is a sensible one, but would note that the success or failure of this approach with regard to migratory salmonids will very much depend on the decisions taken at a later point in this process, and in particular, investment in research and monitoring by both Industry and Government and potentially mitigation of negative effects on migratory fish.
- We support the two year review process set out in the document and the intention to align the review process with other sectoral plans and the National Marine Plan.

### Specific comments

1. *Is the role of the SEA within the plan preparation process clear and understandable?*  
The role of the SEA is largely understandable, but we were unclear as to what constituted a plan or project in relation to this document (See Q6 below).
2. *The environmental protection objectives are based on the objectives of international, European, UK and Scottish legislation and/or policy. Are there any recent changes to this that we should incorporate into the environmental protection objectives framework provided in Appendix 3?*

Whilst Priority Marine Features (the habitats and species of *greatest conservation importance* in inshore waters) are included in Section 3.6 (Baseline information for biodiversity, flora and fauna), they are not included in Appendix 3. Both Atlantic salmon and sea trout are included on the draft list of Priority Marine Features and we would expect the list of Priority Marine Features to be included within the environmental protection objectives. In addition, there is no mention in Appendix 3 of the Scottish Government's Marine Nature Conservation Strategy. Whilst the Marine Planning system is mentioned in Appendix 3 the plan is currently in draft form and will not be finalised until 2012. It is not clear in which form the plan will be considered.

3. *Are you content with the level of detail proposed for the environmental baseline? Is there recently published information, not included here, of which we should be aware?*

Whilst we are content with the detail proposed here, including the inclusion of Priority Marine Features, we would note that a great deal of uncertainty remains with regard to the migration routes, feeding areas, behaviour, potential impacts of renewable energy devices and potential for cumulative and/or in combination effects on migratory fish. We would expect the SEA to identify these issues, and build on the extremely useful Research Implementation Strategy already initiated by Marine Scotland/Marine Scotland Science. It would be useful to also incorporate recent work by SNH on least damaged/more natural areas as the first stage of the MPA identification process and any emerging results from the recently announced MPA survey work.

4. *Are you content with the scope of the assessment, in terms of:*

i. *the environmental topics that are scoped in and out of the assessment?*

We are content that the potential effects of marine renewable devices on migratory fish are within the scope of the assessment.

ii. *the scope of the plan to be assessed (i.e. 0-200 nautical miles around the whole of Scotland's coast)?*

Whilst we are content for the scope to be 0-200nm around the whole of Scotland's coast, our main concerns with regard to measurable effects on migratory fish are likely to be within 12nm. We also support the assessment of onshore and offshore grid connections where this information is available. As far as possible, potential 'corridors' of development should be considered as part of the SEA in order to inform the location of potential EMF effects, as well as potential effects on important benthic habitats.

5. *We would welcome your views on the proposed assessment methodology, including the proposed SEA objectives.*

We are largely content with the proposed assessment methodology, including the proposals for consultation. With regard to the proposed SEA objectives, we believe the objective for biodiversity flora and fauna should be reworded for consistency with s5 of the Marine (Scotland) Act 2010: To protect and where appropriate enhance the health of the marine and coastal ecosystems, and their interactions.

With regard to mitigation, we are not clear as to how the SEA can adequately address mitigation when the potential environmental effects of existing and future devices are essentially unknown. We have no information on device type, development size etc. on which to base a mitigation strategy.

6. *We would welcome information on the plans/projects that you consider should be included in the cumulative effects assessment.*

We are not clear on what constitutes a plan or project in relation to this document. In the absence of a definitive list of the plans/projects in Scottish territorial waters, we would suggest that the following issues would need to be considered. All plans/projects relating to: marine renewables (e.g. Sectoral Marine Plan for Offshore Wind energy, Saltire Prize areas etc.); commercial fishing (both inshore and offshore); aquaculture; and any other developments which have the potential to generate noise or EMFs.

We are unclear as to the approach to be taken regarding the cumulative effects assessment. Many of the potential interactions set out in the document would appear to be in-combination effects rather than cumulative effects and therefore we would seek clarity as to whether in combination effects will also be considered. With regard to potential cumulative/in-combination effects on migratory fish, our primary concerns would be noise during construction and operation of devices and EMFs arising from cabling and operation of devices, particularly with regard to the uncertainty surrounding migration routes of fish. Related to the above effects would be the potential for an array of devices, emitting EMFs to act as a physical barrier to migration.

7. *We would welcome your views on the reasonable alternatives which we propose to assess.*

Whilst we understand the policy drivers behind the Scottish Government's plans to develop marine renewable energy, we also believe that many of the targets for development have been set in the absence of rigorous environmental information. In this context it may not be possible to find suitable alternatives which have a sufficient wave or tidal resource to support development in a commercially viable manner. It may therefore be necessary to include, as an alternative, a reduced overall capacity, should this prove necessary to safeguard marine and coastal ecosystems. This surely, is the basis for employing the survey, deploy and monitor approach.

8. *Are you content with the proposed consultation process, including the sectoral and community engagement elements?*

Yes.

**For further information please contact:**

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