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**7 July 2011**

Dear Sir/Madam,

It has recently come to our attention that the Freshwater Trout Aquaculture Dialogue (FTAD) standards do not prohibit net pens for trout in areas of freshwater containing wild salmonids. We fully support the Salmon Aquaculture Dialogue (SAD) standard that prohibits the use of net pens for salmon smolts in areas of freshwater containing wild salmonid populations and we are extremely disappointed that the FTAD standards do not have a similar prohibition. We can see no clear rationale for this difference between salmon and trout.

Many freshwater trout facilities have very poor records of fish containment. For example over a period of 15 months between 2008 and 2009 over 15,000 rainbow trout escaped from trout farms into Loch Awe and Loch Etive. These escaped fish caused a substantial nuisance to the local salmon and brown trout fisheries.

In addition there are serious questions regarding the impact of such large numbers of escapees on the local fisheries ecology. There is evidence to suggest that rainbow trout will predate upon young salmonids (including salmon smolts, sea trout and brown trout). More worryingly these fish represent a very real competitive threat to salmonids. Because Scottish Lochs are generally nutrient poor and hold only small populations of wild salmonids it is easy to see that even small escapes may have a large impact.

Whilst there is no evidence at the moment of rainbow trout populations breeding in the wild in Scotland, this has occurred in England on the Derbyshire Wye. Given the enormous potential impact of a naturalised population on the indigenous ecology of Scotland we would argue that this is a risk that is not worth taking.

Finally the issues of uneaten food being ingested by young sea trout and discouraging them from going to sea, as well as issues of nutrient release into relatively small enclosed water bodies, are the same for trout pens as they are for salmon smolt pens in freshwater.

We believe there must be a similar prohibition of the use of net pens in freshwater in the FTAD standards to that contained in the SAD standards.

Yours faithfully,

Dr Alan Wells  
Policy & Planning Director, ASFB

and on behalf of:

Callum Sinclair – Rivers and Fisheries Trusts of Scotland  
Paul Knight – Salmon and Trout Association  
Robert Younger – Fish Legal