



Association of Salmon Fishery Boards

Aquaculture & Fisheries (Scotland) Bill

Briefing for Stage 1 Debate: 28 February 2013

“A number of species are held dear by the Scottish public. 91% are glad that wild salmon are in Scotland’s rivers.”

SNH Survey (2011): What the Scottish public value about the natural heritage¹

“The operation of any salmon farm offers potential risk to wild and other farmed salmonids in the area. There is a risk that fish may escape and compete with or genetically dilute native wild stock. Disease or sea lice may be spread from farmed to wild stock or vice versa.”

Sally Davies, Environment Manager, Scottish Sea Farms²

Introduction

- We warmly welcome the Rural Affairs Environment and Climate Change Committee’s Stage 1 Report and its recommendations to strengthen the provisions of the Bill in a number of key areas. Like the RACCE Committee, we support the general principles of the Bill.
- Scotland is known worldwide for the quality of its salmon and sea trout fishing and boasts some of the most prolific, and scenic, salmon rivers in the world. It is possible to fish for salmon and sea trout in Scotland from January to November and this results in year-round rural employment in such fisheries. Salmon and sea trout fishing is an important component of Scottish tourism in the Year of Natural Scotland.
- We believe that one of the great advantages of the current structure of fisheries management in Scotland is that the resource is managed at a local area scale rather than centrally, and funding raised locally is spent locally. We believe that this principle of local management, delivered jointly by District Salmon Fishery Boards (DSFBs) and Fishery Trusts remains the foundation of effective fisheries management in Scotland.
- We also recognise the permanence and economic importance of the aquaculture industry to Scotland. However, there have been, and continue to be, impacts upon wild fish stocks in the areas where the industry is most active and it is important that these impacts are appropriately understood and managed. It is also important that the wider public understands the measures taken by the industry to manage these issues.

Part 1: Aquaculture

1. Publication of sea lice data

We strongly welcome the Committee’s recommendation that sea lice data should be published at a Farm Management Area level and that *‘The Committee is still considering whether sea lice data should be published on a farm by farm basis...’*. A wide cross-section of stakeholders – both public and private sector – have highlighted that the lack of publically accessible farm-specific data remains a significant barrier to the scientific understanding of the impacts of aquaculture and puts at risk attempts to minimise negative interactions. We believe that any concerns related to commercial sensitivity can be alleviated by publishing farm-level data with an appropriate time-lag, as is the case in Ireland. If poorly performing farms are protected by the publication of data at an inappropriate scale, there is an associated reputational risk to those operators that demonstrate excellence.

2. Publication of farm management agreements/farm management statements

Whilst publication of sea lice data at an appropriate scale will allow the industry to demonstrate their management response to sea lice infestation, the publication of farm management agreements and

¹ Summary available at: <http://www.snh.gov.uk/docs/B941737.pdf>

² Comments made on page 7 of a request for an EIA Screening opinion for Port nan Ledaig (FFR/ABC/007)

farm management statements will demonstrate the overall strategy behind such management and allow the general public, and local fisheries managers to be assured that these issues are being addressed seriously. Publication on a website would not carry any significant cost and would not prevent these documents to be updated as required.

3. Protection of wild fish from sea lice

Existing legislation allows Scottish Ministers to require fish farms to execute works, or to take other steps, with the purpose of the prevention control or reduction of parasites. However, we are informed by the Fish Health Inspectorate that such action is limited to observed problems with farmed fish. We believe that this Bill presents an opportunity to allow potential sea lice infestation of wild fish to be taken into account as part of such action. IN some instances, due to the close relationship between the biomass of fish on a farm and sea lice released from the cages, such action may require an enforced reduction in biomass.

Part 2: Salmon fisheries

4. Governance of District Salmon Fishery Boards (DSFBs)

We are largely supportive of the principles behind the good governance requirements in the Bill – our Code of Good Practice for DSFBs³ is designed to ensure that DSFBs perform at a consistently high level across Scotland. We will work closely with Marine Scotland to ensure that clear guidance is provided to DSFBs to enable them to effectively discharge the additional duties arising from the Bill. Such guidance will be crucial given the large variation in size and resources of DSFBs across Scotland.

5. Carcass Tagging

We strongly welcome the statement that *'the Committee supports the individual numbering of tags and believes it would be an essential part of making the tagging scheme effective'*. We believe that the Bill should be amended to ensure that the system uses **individually numbered, recorded tags** and that the offence of selling an untagged fish is extended to buying *and* selling, in line with provisions in existing salmon legislation. In addition, we would seek a clear assurance that the carcass tagging system will be in place in time for the 2014 season. Any system which does not use numbered tags would not allow verification of catch data, nor would it prevent illegal sales of fish from other parts of the United Kingdom (where tags are numbered) or of fish caught by rod and line (sales of which are banned).

6. Reduction in potential commercial exploitation

The operation of Mixed Stock Fisheries (MSFs - any fishery taking fish from 2 or more rivers of origin) is contrary to internationally accepted best practise because they prevent management of the resource on an individual catchment basis. Given the current high price of wild salmon and sea trout there is significant potential for netting effort to increase in future. We are aware of at least 129 dormant netting stations which have the potential to come back into operation. We believe that the Bill should contain a provision to ensure that, when a netting station is put up for sale, or is to be leased to a third party, the relevant DSFB should, *in the interests of salmon conservation*, have a statutory right of first refusal to purchase (or lease) that netting operation before any proposed sale (or lease) could proceed. Such a right would also not be prejudicial to the fishery owner who would still have to receive appropriate compensation for the value of the fishery. It would not prevent existing fisheries from operating, but would prevent a significant increase in commercial exploitation, which would fly in the face of internationally accepted best practise.

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.

For further information please contact:

Alan Wells | Policy & Planning Director
Tel: 0131 272 2797 | Email: alan@asfb.org.uk

³ Available at www.asfb.org.uk/governance