



**Cath Preston**

National River Basin Planning Coordinator  
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12 June 2009

Dear Ms Preston,

**Consultation on Diffuse Pollution Mitigation Strategy and priority catchment selection**

Thank you for the opportunity to respond to the Diffuse Pollution Mitigation Strategy and priority catchment selection process which will form the basis of a Diffuse Pollution Implementation Plan for Scotland. The following response is provided on behalf of the Association of Salmon Fishery Boards (ASFB) and Rivers and Fisheries Trusts of Scotland (RAFTS) which represent Scotland's 42 District Salmon Fishery Boards (DSFBs) and 20 Fishery Trusts.

Our response to the consultation questions presented is set out below:

1. What do you think of the diffuse pollution mitigation strategy?

Response: We support the strategy and would like to continue to be involved in its development and delivery. We do note that there is no mention of NGOs like Fisheries Trusts in the Strategy and it is thought that such organisations could play an important role.

We welcome the aim of establishing local linkages between different bodies and sectors to affect an awareness raising campaign. We particularly welcome the inclusion of trade bodies as they may influence improved environmental standards on farms. We are also fully supportive of a campaign that will raise awareness on legislation such as GAEC (and enforcement of regulations), as we recognise that failure to conform with GAEC is currently an important contributor to Diffuse Pollution (DP).

One of our main concerns is how this strategy will be achieved. To effect change, the strategy needs to tackle DP on the ground. To engage the agricultural sector (one of the main parties responsible for DP) a non-bureaucratic, well resourced, funded programme will be required. Although on paper SRDP would appear to be a suitable match, its current form is not attractive for the agricultural sector to access, and therefore the strategy should concentrate on making SRDP accessible and attractive to the farming community. We would approve of the use of SRDP to target funds to areas of high DP importance but we are unclear who would put forward applications for such funding, as we consider it unlikely that farmers will access this fund directly.

2. What do you think of the priority catchment selection methodology?

Response: We are supportive of this prioritisation process which will tackle a national issue in a step-wise and methodical manner and provide support to areas of greatest need.



We note SEPA's intent to undertake detailed assessment of the priority catchments. We hope that this will not delay action on the ground and think that much of this information may already be available (for example: collected by SEPA during the original water classification survey; habitat survey data collected by NGOs such as Fishery Trusts; Fishery Trusts also have information on sources of pollution, presence of buffer strips, etc). We also note that characterisation of catchments will include identification of pressures unrelated to DP (e.g. abstraction, morphology) and are concerned that this may lead the Diffuse Pollution Mitigation Strategy to lack focus and potentially end up lacking in achievement (this final point also relates to question 4, below).

3. What do you think of the initial list of diffuse pollution priority catchments?

Response: We accept the initial listing of priority catchments and has no specific changes for consideration. However, it is hoped that there may be some flexibility in the prioritisation if NGOs or other parties are tackling diffuse pollution, such that efforts can provide added value.

We have a minor query as to why the Water of Girvan is ranked 6 but is demoted to the second round of the priority cycle.

4. What do you think of developing an integrated approach to impacts within priority catchments?

Response: We are unclear of the logic behind such an integrated approach and have concern that efforts that should be going towards mitigating DP will become re-directed to morphological impacts. We can see little benefit (in terms of saving time, effort or money) in addressing morphological impacts just because work on DP is on-going within the catchment as the causes of DP are not generally the same as the causes of morphological impact.

5. Are there any other changes?

Response: All our comments have been outlined above.

This response has been prepared by the River Dee Trust on behalf of and in consultation with the members of Association of Salmon Fishery Boards and Rivers And Fisheries Trusts of Scotland.

Yours sincerely,

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River Dee Trust

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