



Association of Salmon Fishery Boards

Comments on the Draft Sectoral Marine Plans for Offshore Wind, Wave and Tidal in Scottish Waters November 2013

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 DSFB's 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.

General comments

We welcome the opportunity to comment on this consultation. However, due to the lack of knowledge of the marine migration routes of Atlantic salmon and the marine feeding areas for sea trout, our comments are necessarily somewhat general. With the exception of a couple of key areas known (or assumed) to be of importance for migratory salmonids, our concerns relating to marine renewable developments are likely to be the same, regardless of the specific location of such developments. Our key concerns are set out in our guidance to DSFBs and Fishery Trusts¹ which is copied to all developers at an early stage in their prospective developments. This guidance was developed in close collaboration with Marine Scotland Science.

Specific Comments

Plan Development

1. Do you agree with the approach (outlined in Section 3 of the Sectoral Marine Plans) used to develop the Plans?

Yes No

Please explain:

Our answer is a qualified yes. Whilst the approach is comprehensive, as noted above there is a distinct lack of knowledge with regard to the marine migration routes of Atlantic salmon and the marine feeding areas for sea trout, and very little is known about the swimming behaviour of such species (i.e. do they swim near the surface, near the bottom, or is it variable). Therefore, these factors are, by definition, not included in the MARS

¹ <http://www.asfb.org.uk/wp-content/uploads/2011/04/ASFB-RAFTS-Advice-on-Marine-Renewables1.pdf>

system. We are currently in a position where decisions are being taken by MS-LOT on the basis of extremely limited information. This is not sustainable going forward.

ASFB are members of the steering group overseeing the national strategy into strategic research for offshore marine renewables and anadromous fish. We will continue to engage positively with this process, in order to develop and help deliver a credible and effective research strategy. We would emphasise the importance of developing a finalised, agreed research plan, with a clear time schedule for delivery, at the earliest possible date. Crucially, it is vital that adequate resources are made available to support this work, in order that key questions can be answered, in a robust and timeous manner. Until such time as the research strategy is financed and delivered in full, we are not in a position to support any further sectoral plans for marine renewables.

2. Do you have any views on the findings of the Sustainability Appraisal Report? Do you think that all the social, economic and environmental effects (positive and negative) have been identified? Are there other issues that should be taking into account in the preparation of the Final Draft Plans?

ASFB contributed to the steering group for this process and we are content that our views were understood and taken on board.

3. The SEA has identified a range of potential effects from the Draft Plans. Measures for the mitigation of these effects have been identified in the SEA environmental report. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

As stated above, the national strategy into strategic research for offshore marine renewables and anadromous fish is in its infancy. This process, in close conjunction with site specific monitoring requirements is crucial in identifying actual effects and possible measures for mitigation.

4. The Socio-economics Report has identified a range of potential impacts on existing sea users. Do you have any views on these findings? Do you think that the proposed mitigation measures will be effective? Do you have any additional suggestions?

No comment

5. Taking into account the findings from the technical assessments, do you have views on the scale and pace of development that could be sustainably accommodated in Scottish Waters?

We would not be in a position to support any development beyond the current plan areas until such time as the national strategy into strategic research for offshore marine renewables and anadromous fish is financed and delivered in full.

6. Are there aspects of the Draft Plans that you believe should be improved? Are there any aspects you believe should be taken forward differently?

Please explain any reasons for your answer and provide details of any suggested improvements:

No comment

7. Do you believe an appropriate balance, between tackling climate change, maximising opportunities for economic development and dealing with environmental and commercial impacts been achieved in the Draft Plans?

Yes No

Please explain:

No comment

Draft Plan options

8. The Draft Plan for Offshore Wind Energy proposes 10 Draft Plan options. What are your views on the Offshore Wind Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?

Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. OWN1)

As we stated above, our concerns relating to offshore wind developments are not unique to the specific location of such developments. We would however, note the clear need for adequate monitoring of potential impacts on migratory fish. We are particularly concerned that the recent report investigating the potential influence of Robin Rigg wind farm on the abundance of adult and juvenile Atlantic salmon concluded that there is a 1 in 5 chance that the wind farm could be depressing Atlantic salmon abundance in potentially affected rivers by as much as 40% without being detected. Clearly the monitoring strategy in this case was inadequate and we would wish to ensure that this does not occur again in the future.

We would also note our concern at the apparent lack of coordination between developments in similar geographic locations with regard to the transmission cables arising from offshore wind developments. We therefore have a situation in the Moray Firth where cables will come ashore adjacent to the mouth of the River Spey (an SAC) and near Fraserburgh (not far from the River Deveron), rather than one cable being utilised. For the Forth arrays, there are a number of proposed cable runs which cover an arc from Montrose in the north to Torness in the South. This will result in far greater areas of sea bed being disturbed (potential feeding areas for sea trout) than would otherwise be necessary and given the apparent engineering challenges associated with avoiding sensitive times of year for such work, could also potentially impact on migration of smolts and returning early running salmon in the spring. In addition, given that the MSS research into EMFs has yet to be published, this may also increase the risk of EMFs on migratory fish and other species.

9. The Draft Plan for Wave Energy proposes 8 Draft Plan options. What are your views on the Wave Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?

Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. WN1)

Similarly to our previous answer, our concerns relating to wave developments are not unique to the specific location of such developments. EMFs are potentially a greater concern (depending on the technology employed) – in some instances cables associated with the devices cannot be shielded by burial or rockfall as they are suspended in the water column. We would emphasise the close proximity of WN1 and WNW1 to Atlantic salmon SACs.

10. The Draft Plan for Tidal Energy proposes 10 Draft Plan options. What are your views on the Tidal Draft Plan options? Are they in the correct place? Are there reasonable alternatives that should be considered?

Please indicate which proposed Draft Plan option(s) you are commenting on using the relevant indicator (i.e. TN1)

Whilst our generic concerns relating to tidal energy are the same as for Q8 & Q9, we would also highlight some specific issues for the tidal draft plan options. TN1 (Pentland Firth) is a key area of importance for migratory fish. Devices deployed in this area have the potential to impact on essentially any river in Scotland. TSW1 is very likely to represent a key migration route for Atlantic salmon (and possibly sea trout) arising from the rivers in the Solway Firth (including the River Bladnoch SAC). TW2 is very likely to sit on the key migration route for all Atlantic salmon arising from the Solway and the Clyde (including the River Bladnoch and River Endrick SACs) and TW1 may also represent the key migration route for all fish in the South West of Scotland. It is clear that a far great understanding of migration routes is required before any significant developments are consented in these areas. It is also clear that in combination and cumulative effects will need to be carefully considered. Due to the close proximity of TSW1, TW2 and TW1 to the border with English and Northern Irish territorial waters, we would also be concerned as possible cumulative effects with developments in those areas. As things currently stand we are unclear how such cumulative effects could or would be managed

On that basis we do not believe that the options highlighted above should be taken forward until such time as the national strategy into strategic research for offshore marine renewables and anadromous fish is financed and delivered in full and detailed information on the migratory pathways of salmonids through these areas is gathered.

11. Do you believe any draft plan options be removed from the Draft Plans for Wind, Wave and Tidal Energy?

Yes No

If Yes, please indicate which proposed Draft Plan options you believe should be removed (using the relevant indicator), and explain why :

TN1, TSW1, TW2 and TW1. However, following full delivery of the national strategy into strategic research for offshore marine renewables and anadromous fish, including a detailed understanding of the migration of fish in these key areas, we would be content for such areas to be investigated further.

Plan Implementation and Review

12. The Plans, once implemented, will be reviewed to take account of actual development and increasing knowledge of development factors. How often do you believe should this be done and why? Who do you believe should be involved in the Plans Review Steering Group, to oversee the review process?

Plans should be reviewed as and when new information becomes available. ASFB would be happy to be involved in this process, assuming that progress is made on strategic research in the meantime.

Strategic Environmental Assessment

13. To what extent does the Environmental Report set out an accurate description of the current environmental baseline? Please also provide details of any additional relevant sources.

No comment

14. Do you agree with the predicted environmental effects of the plans as set out in the Environmental Report?

No comment

15. Do you agree with the recommendations and proposals for mitigation of the environmental effects set out in the Environmental Report?

See our response to Q3 above.

16. Are you aware of any additional on-going research or monitoring that may help to fill gaps in the evidence base, particularly relating to the marine environment and its interactions with renewable energy devices? Please give details of additional relevant sources.

The national strategy into strategic research for offshore marine renewables and anadromous fish

17. Are you aware of any further environmental information that will help to inform the environmental assessment findings?

No

Additional comments

18. Do you any other comments you wish to make of the Plans and / or the related assessments?

Some of the current licensing decisions are made on the basis of modelling information, some of which suggests that MS-LOT are content to license developments on the basis that a predicted number of Atlantic salmon may be negatively impacted or killed. This appears to be on the basis that this predicted number is less than, or comparable with, the number of fish currently taken in net or rod fisheries. We have a fundamental difficulty with the principle behind this. Any fish currently killed by these fisheries result from a contribution (via DSFB financing) to the management of the resource. MS-LOT are essentially licensing a removal of fish from the population without any such contribution to the management of the resource. We do not believe that this is appropriate and therefore any predicted loss of fish resulting from marine renewable developments (where this cannot be demonstrated to have been mitigated for) should result in a contribution to the management of the fishery. This was exactly the approach that was adopted by the hydro-electricity industry and the same principle should apply to offshore renewables.



Draft Sectoral Marine Plans for Offshore Wind, Wave and Tidal in Scottish Waters

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Association of Salmon Fishery Boards

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Wells

Forename

Alan

2. Postal Address

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Email alan@asfb.org.uk

3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No