Association of Salmon Fishery Boards

Comments on 'Preparation of updated Loch Ewe Aquaculture Framework Plan' December 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 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.

We welcome the opportunity to provide early comments prior to the preparation of the updated Loch Ewe Aquaculture Framework Plan. We have limited our concerns to the potential negative consequences of finfish aquaculture on wild salmonids (primarily disease and parasite transfer and escapes) and therefore we have not commented on shellfish aquaculture. The consultation is set out as an update to the Loch Ewe Framework Plan, but we are unaware of any previous plan, and we could not find such a plan from the Highland Council Website. Our response below is therefore set out withg specific reference to the Loch Torridon Aquaculture Framework Plan. All paragraph numbers below relate to those set out in the Torridon Plan.

Salmon and Sea Trout Fisheries

The River Ewe, the principle river flowing into Loch Ewe, has historically supported significant salmon and sea trout populations. Until the 1990s, the River Ewe - Loch Maree system supported the most important freshwater fishery within Wester Ross. Unlike other major fisheries in the area, the Loch Maree fishery depended primarily upon sea trout with an annual catch of 1,500 – 2,000 sea trout per year. These fisheries provided substantial employment and benefit to the local economy as well as amenity for local people. During the 1970s and 1980s, up to 18 boats, each with a ghillie, provided angling for sea trout on the loch - nine ghillies were employed by the Loch Maree hotel alone. For sea trout fisheries, Loch Ewe is the most important sea loch in the area.

Salmon and sea trout stocks remained healthy until the 1980s. Rod catches of salmon declined during the 1990s reaching their lowest levels within the early years of the 21st Century. Subsequently, rod catches of salmon have recovered to near historic levels by 2011. The sea trout fishery collapsed in the 1990s (Butler & Walker 2006), with the loss of many jobs. This fishery has not recovered.

In agreement with the Torridon Plan, we acknowledge that salmon aquaculture is not the only cause of the decline in wild salmon and sea trout stocks. However, salmon farming poses some significant risks including:

- the transfer of parasites, most notably sea lice, from the farmed stock to wild stock;
- damage to benthic flora and fauna caused by waste feed and medicines;
- disruption of genetic integrity and local adaptations of wild stocks due to escapes from salmon farms

In the context of Loch Ewe, sea lice are currently the principle concern for wild fisheries. From the late 1980s, anglers reported catching sea trout which were infected with high numbers of sea lice. Lice

epizootics affecting sea trout were recorded most recently in 2003 and 2007. Sea trout with high numbers of lice or fin damage associated with lice infection were recorded by Wester Ross Fishery Trust most recently in 2011. Sea lice epizootics on sea trout have been shown to relate to the operation of salmon farms in nearby areas (Middlemas, et al (in prep)). In Loch Ewe, lice levels on sea trout monitored at Poolewe (1997 – 2007) were highest during the 2nd year of the salmon farm production cycle at nearby farms[1].

Specific comments

- Paragraph 40 of the Torridon Plan states: *It is essential however that navigational access is maintained, that there is sufficient separation distance between adjacent sites and that any future developments for salmonids are located away from the entrance to important game fishing rivers given the potential for escapes and the subsequent effects on wild fisheries*.

  As stated above, the River Ewe system was formerly the most important fishery for sea trout in North West Scotland. In keeping with the above statement from the Torridon Plan, we do not believe that there is an appropriate location within Loch Ewe, located away from the entrance to an important game fishing river. It should also be noted that there is currently very little finfish aquaculture development immediately to the north and south of Loch Ewe. The strategic relocation of biomass from Loch Ewe would therefore have the potential to be of particular significance to wild sea trout in the River Ewe system and offer the greatest potential for the recovery of these stocks.

- Para 45: *When considering the various issues relating to individual aquaculture applications, planning authorities take into consideration a wide range of factors, both socioeconomic and environmental. Whilst some of these issues e.g. biomass and sea lice mediation by SEPA/MSS, may be regulated by other organisations, there may still be potential impacts which need to be considered by the planning authorities under other legislation or guidance e.g. the Biodiversity Duty.*

  We are concerned that there is no single organisation which takes responsibility for the effects of sea lice on wild salmonids. It is therefore vital, from a wild fishery perspective, that local authorities across Scotland take the biodiversity duty seriously. We would also highlight the General Duty under Section 3 of the Marine (Scotland) Act 2010:

  In exercising any function that affects the Scottish marine area under this Act-
  (a) the Scottish Minsters, and
  (b) public authorities
  must act in the best way calculated to further the achievement of sustainable development, including the protection and, where appropriate, enhancement of the health of that area, so far as is consistent with the proper exercise of that function.

  We would further note that both salmon and sea trout are included on the list of priority marine features, the habitats and species of *greatest conservation importance* in inshore waters. On that basis we believe that these species should be referenced both as game fish and also as species of conservation importance (e.g. paragraph 108-113 *and* 94-98, in the Torridon plan).

- Para 57: *One of the main reasons why medicines might be used on a salmon farm is the control of sea lice. These are naturally occurring planktonic animals which are ubiquitous in the marine environment around the coast of Scotland. Large concentrations of caged salmonids are sometimes associated with larger than normal quantities of sea lice. They have therefore been implicated as one of the factors in the decline of wild salmon and sea trout on the west coast. The risk of adverse impacts varies from site to site but it appears that wild salmon are more at risk in long fjordic systems where they have to pass several fish farms during their migration to sea (see bibliography in appendix 5). As planning authorities have a biodiversity duty to consider these impacts, they will consult with SEPA and MSS with regard to planning applications*.

[1] See: http://www.wrft.org.uk/fisheries/seatrout.cfm and links to sea lice monitoring reports.

It is important that the Loch Ewe Aquaculture Framework Plan recognises the difference in life history strategy between Atlantic salmon and sea trout here. Whilst we agree that salmon would be more at risk in long fjordic systems that small sea lochs, it must be recognised that Loch Marie is primarily a sea trout system. Whilst further research is required into the marine habitat of sea trout, it is recognised that this species remain in coastal waters throughout the marine phase of their lifecycle. Sea trout are therefore potentially at increased risk of the transfer of parasites, most notably sea lice, from the farmed stock to wild fish. It should also be noted that, there is currently very little finfish aquaculture development immediately to the north and south of Loch Ewe. The strategic relocation of biomass from Loch Ewe would therefore have the potential to be of particular significance to wild sea trout in the River Ewe system and offer the greatest potential for the recovery of these stocks.

- Para 76: *The Council is fully supportive of the industry codes of practice and it recommends that all aquaculture operators carry out their production and site management in accordance with the relevant code. The Council believes that such good practice should be more than just voluntary, so is of the view that permission to operate a fish or shellfish farm should be dependent on full compliance with the relevant code*.

  Whilst we agree that good practice should be more than just voluntary, we have concerns about the ability of the industry code to protect wild fish. Indeed, we would highlight the following statement from Marine Scotland Science: '*It should be noted that adherence to Integrated Sea Lice Management (ISLM) as described in the industry Code of Good Practice may not necessarily prevent release of substantial numbers of lice from aquaculture installations. The CoGP takes no account of farm size, or number of farms in an area, in setting threshold levels for sea lice treatments. This may be appropriate when the aim is to protect the welfare of farmed fish but it will not necessarily prevent significant numbers of larval lice being shed into the environment, and posing a risk for wild fish particularly in the case of larger farms or management areas holding a large biomass of farmed fish.*' Marine Scotland Science also stated: '*There is evidence of an effect of lice from fish farms on sea trout, although the extent to which the fish populations are affected is not clear...There is no published evidence of an effect of lice on sea trout at a population level, however, such an effect would be expected in view of the high infestation intensities observed near farms in the second years of salmon production cycles.*'

Ultimately, we do not believe that Loch Ewe is an appropriate site for fin fish aquaculture from a wild fisheries perspective (although additionally, this may prove to be the case for other priority marine species such as mearl and horse mussel beds). At the very least, the strategy should seek to contain the scale of operations at the existing site at its current level, until such time as the industry is able to move to closed containment.

On that basis we believe that the strategy should:

- Discourage the use of any aquaculture consents (if any) which are inactive or undeveloped.
- Ultimately, encourage the consolidation of existing finfish farming activity into another area and leave Loch Ewe free of finfish farming activity.

We look forward to being further consulted in the future as the Loch Ewe Framework Plan progresses.

For further information please contact:

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