



**Association of  
Salmon Fishery Boards**



## **Comments on 'Draft Salmon Aquaculture Dialogue Standards' June 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.

Formed in 2005, Rivers and Fisheries Trusts of Scotland (RAFTS) is an independent freshwater conservation charity representing Scotland's national network of 25 rivers and fisheries Trusts and Foundations. Our members work across over 90% of Scotland's freshwaters to protect and develop our native fish stocks and populations by undertaking a range of activities including freshwater, river habitat restoration, fish and fisheries monitoring, research and education programmes. RAFTS is the membership organisation of the fisheries and rivers trusts operating in Scotland and is, itself, a charity and company limited by guarantee.

We welcome the opportunity to comment on the Draft Salmon Aquaculture Dialogue Standards. Our main concerns with regard to the sustainability of aquaculture continue to be the potential negative effects of sea lice and escapes. We have therefore limited our responses to the sections of the consultation dealing with these issues. We have used the requested template for our comments below.

### **For further information please contact:**

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## COMMENTS ON STANDARDS FOR GROW-OUT

Principle	Criteria/Indicator /Standard (e.g., 2.1.2)	Comment(s)	Proposed solution or amendment
Principle 1			
Principle 2			
Principle 3	3.1.4	We welcome the suggestion that test results for on farm testing for sea lice should be made publically available. We believe that any such data must be transparent and therefore should be made available in its raw form, rather than any sanitized or aggregated version. We do not believe that the current scheme operated by the SSPO would or should meet the requirements of this indicator/standard.	Weekly on-farm testing for sea lice, with <del>test results</del> <u>raw sea lice counts</u> made easily publicly available within 7 days of testing.
	3.1.5	We welcome the inclusion of this indicator as it represents one of the key data gaps in Scotland.	This indicator should also be coupled with the development of an effective sea lice dispersal model for the area in question.
	3.1.6	Again, we welcome the inclusion of this indicator. Such monitoring should be entirely funded by the industry.	
	3.1.7	Whilst we welcome the inclusion of maximum on-farm lice levels which are set at a lower level than those set out by the SSPO Code of Good Practice in Scotland, we are still concerned that 0.1 mature female lice per fish on a particularly large farm may still not provide adequate protection of wild fish. We believe that the size of the farm is critical in determining whether too many sea lice are being produced by the farm. Indeed, Marine Scotland Science have recently made the following statement in a number of farm applications (based on the SSPO	A possible partial solution would be to include a maximum on-farm sea lice level of 0.1 lice per fish <i>in addition to</i> a treatment trigger if monitoring of the wild fish population exceeds the thresholds described in Appendix III, subsection 2. This would occur even if the on-farm lice levels fell below the threshold and would be coordinated across the management area with an overall objective of achieving zero ovigerous lice on the farms (in line with the NASCO International goal).

		<p>thresholds): <i>‘However, 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.’</i> We would also seek clarification as to what is meant by ‘mature’ female lice. We would hope that this does not refer to gravid female lice in which the eggstrings have already developed. The document should refer to ‘adult’ female lice or, in recognition that treatment may take some time, it may be more appropriate to use pre-adult female lice as the maximum in an attempt to ensure that treatment occurs before any larval lice are released. We do not support Option B, because, as the consultation document sets out, under Option B, the feedback from wild monitoring may come too late for a farm to adapt its management quickly enough to be protective, particularly for out-migrating juveniles.</p>	
	3.1.8.	We are not clear as to whether this data would be fully publically available.	We believe that any such data must be transparent and therefore should be made available in its raw form, rather than any sanitized or aggregated version. We do not believe that the current scheme operated by the

			SSPO would or should meet the requirements of this indicator/standard.
	3.4.1	We are concerned that this indicator defines an escape episode as one involving 200 or more fish. This figure takes no account of the sensitivity of the wild population in the area in which the farm is located – in some instances we would expect that 200 escapees could have a massive impact on a small, degraded, vulnerable population of wild salmonids and therefore this standard would not be protective of that population.	<p>Given that the International Salmon Farming Association is signed up to the NASCO International Goal of ‘100% of farmed fish to be retained in all production facilities’, and in recognition of the very real progress that the industry has made with regard to containment in Scotland, we believe that an escape event should be defined as an escape of <i>any</i> fish.</p> <p>In addition, there are some locations where farming is not acceptable as it cannot be carried out in a sufficiently precautionary manner to protect degraded, vulnerable wild salmonid populations. In such locations closed containment should be the minimum requirement for accreditation.</p>
	3.4.2.	Please see above comments.	Please see above comments.
	3.4.6.	We welcome this standard, but would ask that an independent assessment of the rigor of escape prevention planning and employee training is included in this indicator.	
Principle 4			
Principle 5	Criterion 5.3	We would recommend the inclusion of a new indicator here. This would alert wild fish interests that sea lice treatments are failing and that wild fish may be at risk, and would allow neighboring farms and those in adjacent areas to take such resistance into consideration in their selection of sea lice treatments.	Inclusion of a new indicator (5.3.3.) – All farms must report on a publically available database within 7 days of the event, any lack of efficacy or suspected resistance in any sea lice treatments.
Principle 6			
Principle 7			

General comments			

**COMMENTS ON STANDARDS FOR SMOLT PRODUCTION (SECTION 8 of document)**

<b>Indicator/Standard (e.g., 8.4 or 8.22)</b>	<b>Comment(s)</b>	<b>Proposed solution or amendment</b>
8.24. & 8.25.	We welcome these indicators as we believe that FW escapes in water bodies with native salmonids carry unacceptable environmental risk.	
<b>General comments on smolt standards</b>		