

Salmon Interactions Working Group

An update from Fisheries Management Scotland

Introduction

Fisheries Management Scotland welcomes the imminent publication of ground-breaking recommendations to regulate the country's fish-farming industry and safeguard our threatened wild salmonid stocks.

Once implemented, the proposals will reward best practice while ensuring that appropriate sanctions are available where operators fail to meet the far-reaching measures. Crucially, the new regime will put the protection of wild salmon and sea trout at the centre of regulation at a time when stocks are approaching crisis-point.

The recommendations come from a special working group set up after two Scottish Parliament committee inquiries investigated salmon farming in Scotland and concluded that the *status quo* was not an option. The Salmon Interactions Working Group included representatives of fisheries management, conservation and industry bodies. The report's authors have urged Ministers to implement the unanimous recommendations in their entirety.

Background

In 2018, the Scottish Parliament's Environment, Climate Change and Land Reform Committee (ECCLR) and Rural Economy and Connectivity (REC) Committees held two inquiries into Scotland's salmon farming industry. Concurrent with the REC Committee Inquiry, the Scottish Government established a workstream to examine 12 high-level pressures and address the decline in wild Atlantic salmon. The first stage in this process was the establishment of the Salmon Interactions Working Group. The Salmon Interactions Working Group included representatives of Fisheries Management Scotland, conservation and industry bodies in addition to regulators.

The final meeting of the SIWG was held in March 2020 and the resulting report, which was agreed unanimously, is now in the final stages of preparation for publication. The resulting recommendations set out a 'road map' which Fisheries Management Scotland and the finfish farming industry have jointly committed to implement. The report is keenly anticipated and until it is published is highly sensitive in nature. The purpose of this update is therefore to brief you on the substance of the report in advance of publication.

The Scottish Parliamentary inquiries indicated that the *status quo* was not an option and that changes to the regulation of the industry were required. We consider that the report of the SIWG will address these regulatory shortcomings, ensure that appropriate sanctions are available where operators fail to meet regulatory standards and crucially, will put the protection of wild salmon and sea trout at the centre of regulation at a time when stocks are approaching crisis-point.

The report is split into five sections, which are briefly summarised below:

1. Wild/farmed salmonid interactions

This section refers to changes to the regulatory system to ensure that it is fit for purpose, comparable with the highest international and domestic regulatory standards, is fully resourced and meets the tests of being robust, transparent, enforceable and enforced.

A single lead body should be assigned responsibility for regulating wild and farmed fish interactions and given appropriate powers for monitoring and enforcement. In advance of the delivery of a reformed finfish aquaculture regulatory system, Marine Scotland should take an

overarching role to ensure consistency with respect to managing interactions at the local level through the use of agreed standards for Environmental Management Plans.

The regulatory system should place greater priority on the protection of wild migratory salmonids and be based on a geographical scale which is appropriate to wild fish. Farm management areas (areas in which farms are managed on a synchronous basis) should be reviewed with this in mind.

Local engagement mechanisms between finfish farmers and wild fishery managers should be established for pre-application consultation, to agree joint local management priorities and projects, act as a forum for information and data exchange, identify research priorities and request management action as appropriate. This would be a licensing requirement, rather than a voluntary undertaking.

For sites where best scientific evidence indicates that an existing site presents an adverse impact on wild salmonids:

- In the first instance, tighter regulatory standards should apply (see section 2 below);
- The consenting regime should be amended to enable efficient relocation of existing biomass to a suitable alternative location.

2. Licensing and enforcement

The reformed regulatory regime must apply to all farms and should encompass strengthened licence conditions and associated enforcement measures to deliver the essential regulatory protection that wild salmonids require. Therefore, robust conditions to safeguard wild salmonids should be contained within a license rather than through planning consent.

Licence conditions should include: undertaking, recording and reporting of a weekly sea louse count; trigger levels for sea lice intervention action specific to the farm management area (to be reviewed subject to adaptive management); a requirement to monitor lice levels in the environment and assess impacts on wild salmonids; and actions required to be taken where monitoring demonstrates adverse impacts on wild salmonids;

Licence conditions should also include: a requirement to contribute to research to understand the migratory distributions of wild salmonids within the West Coast and Northern Isles; monitoring for the presence of escaped farmed fish from freshwater open pen farms; a requirement for 100% of farmed fish to be retained in all production facilities; and, a requirement to undertake an end of farm cycle review which informs the next production cycle process.

The consenting of new developments should be managed within an adaptive spatial planning model which is risk based, of suitable resolution, underpinned by best available scientific evidence, and takes into account the cumulative effect of management practices of existing developments and impacts on wild salmonid fish.

An enforcement policy should be published, informed by existing controls, to include specific penalties and sanctions for breaching conditions. This will include appropriate fines, proportionate to the scale of the incident, which should apply to escapes of fish.

Enforcement sanctions relating to sea lice and escapes, including the use of fixed and variable monetary penalties, should have a mechanism to allow monies to be invested into wild salmonid conservation work.

3. Farmed and wild salmonid data

The SIWG recognised the need for transparency in data, including a suite of historic and future data which should be made publicly available. In addition to detailed data relating to the fish farming sector, this includes Scottish Ministers investing in appropriate infrastructure to enable catch and associated data to be reported in as close to real time as possible.

4. Farmed and wild salmonid research

The SIWG recognised that there are a number of gaps in our understanding of wild-farmed interactions but emphasised that filling these knowledge gaps is not a pre-requisite for taking forward regulatory reform. Recommendations include refining or developing genetic analysis tools to facilitate identification of introgression arising from farmed fish escapes. The reforms to the regulatory system also encompass provisions to secure investment into addressing strategic research and innovation questions relating to farmed/ wild salmonid interactions.

5. Wild salmonids

The SIWG considers that additional resources are required to support management of salmonids, particularly in west coast rivers and welcomes the commitment to produce a wild salmon strategy for Scotland. As part of the wider workstream to address other pressures on wild salmonids it is recommended that Scottish Ministers should make wild salmonid conservation a national priority and direct efforts to move beyond the status quo across the range of hazards which wild salmon face.

The wild salmon strategy should urgently consider and recommend the introduction of mechanisms to ensure that riverine and riparian habitat improvements are built into changes to the rural payments system, and should review the potential to further protect salmon within the context of the salmon conservation regulatory framework, particularly in relation to handling fish during catch and release.

As part of the wild salmon strategy, Scottish Ministers should establish a working group to oversee the delivery of SIWG recommendations, assess and review the performance of the reformed regulatory structure, support local engagement structures and consider the results of local wild fish monitoring.

Scottish Ministers should urgently explore new means to improve investment in Scotland's rivers and experience from other countries should be used to inform a reformed funding mechanism for fisheries management. In recognition of the significant resources required to manage wild-farmed interactions appropriately, Scottish Ministers should urgently identify means to increase capacity within Fisheries Boards and Trusts in the aquaculture zone and in particular establish an appropriate mechanism for undertaking this function in Orkney and Shetland.

The Salmon Interactions Working Group included representatives of fisheries-management, conservation and industry bodies. The report's authors have urged Scottish Ministers to move swiftly to implement and support the delivery of the recommendations summarised above.