

PE1598/E

Association of Salmon Fishery Board letter of 2 August 2016

PETITION PE1598

Calling on the Scottish Parliament to urge the Scottish Government to strengthen Scottish legislative and regulatory control of marine fish farms to protect wild salmonids of domestic and international conservation importance.

Thank you for your letter of 5th July 2016. The Association of Salmon Fishery Boards (ASFB) welcomes the opportunity to comment on this petition and to describe our views to the Public Petitions Committee.

ASFB represents the interests of its 41 member District Salmon Fishery Boards and the Tweed Commission who have a statutory responsibility to protect and improve salmon and sea trout fisheries.

The ASFB supports the petition submitted by Salmon and Trout Conservation Scotland. The salmon and sea trout of the west coast of Scotland require protection from the consequences of marine aquaculture in some areas. Chapter 7 of Scotland's National Marine Plan (<http://www.gov.scot/Publications/2015/03/6517/8>) states that there is a presumption against marine finfish farm developments in the north and east coasts **to safeguard migratory fish species**. The logical consequence of this statement is that it is incumbent on the Scottish Government to safeguard migratory fish in the aquaculture zone of the west coast and the islands against threats to their populations.

The evidence provided by Salmon & Trout Conservation Scotland points to the effect that increased sea lice populations have on wild fish. At the present moment, the Scottish Government has no powers to control sea lice on marine fish farms for the purpose of protecting wild salmonid fish. This is despite the Atlantic salmon being an internationally protected species, that salmon and sea trout are important species for conservation, for recreational angling, and that both these iconic fish species provide many rural areas with much needed employment.

We wish to comment on the guidance that Marine Scotland Science provide with regard to aquaculture. Reference is made to scientific evidence from Norway and Ireland with regard to the impact on marine mortality of salmon. The International Council for the Exploration of the Sea recently assessed this evidence, and in advice to the North Atlantic Salmon Conservation Organisation this year concluded that, on average, sea lice from marine aquaculture resulted in a 20% reduction in the number of salmon returning to a river. This is a very worrying figure and in our view demonstrates the conservation challenges posed to wild fish populations by marine aquaculture in Scotland.

With regard to the publication of sea lice data, the ASFB feels very strongly that sea lice data should be published on a weekly, farm-by-farm basis. Data relating to site details, escapes of farmed fish, monthly biomass, and sea lice treatments are already published through the Scotland's Aquaculture website (<http://aquaculture.scotland.gov.uk/>) and Fish Health Inspectorate reports are also available online. Given the importance of farmed sea lice levels to wild fish conservation, there is no reason why sea lice data should not be published on a farm-by-farm basis.

We are encouraged by our understanding that the industry is now looking at a wide suite of sea lice control measures, including relocation to more "open sea" sites, mechanical, biological and chemical

control measures and shortened production cycles. At the same time, we remain concerned that new sea lice management thresholds (through the Sea Lice Escalation Plans)

normalise what we consider to be very high sea lice levels on farmed fish, and are at odds with the industry's own Code of Good Practice. We understand that the Sea Lice Escalation Plans were introduced at the behest of the Fish Health Inspectorate with the intention of further protecting farmed fish welfare: the FHI do not have the authority to use the plans to protect wild salmon and sea trout populations.

To summarise, better control of marine aquaculture sea lice is necessary to safeguard migratory fish species in the aquaculture zone. We believe that formal regulation has a part to play in this.

The ASFB hopes the Public Petitions Committee will commend this petition to the Scottish Government and provide some much needed protection to the wild salmon and sea trout on the west coast of Scotland.

Yours sincerely,

Alasdair Laing
Chairman