

PE1598/F

Letter from Callander McDowell

Protecting wild salmonids from sea lice from Scottish salmon farms

An additional response to Salmon & Trout Conservation Scotland's Petition from Dr Martin Jaffa on behalf of Callander McDowell.

Salmon & Trout Conservation submitted oral evidence to the Petitions Committee on June 30th 2016 and focused their evidence on how sea lice on salmon farms should be controlled. The issue of whether sea lice from salmon farms are exerting an adverse effect on wild salmonid fish seemed to be of secondary interest. Guy Linley Adams told the Committee that there could be an adverse effect in some circumstances but concerns have been raised due to declines of salmon and sea trout on the Scottish west coast. Mr. Linley Adams did not show that these declines are due to the presence of salmon farms. The evidence is largely circumstantial.

Mr. Linley Adams and Andrew Graham Stewart provided the results of an updated study that showed the catch on the east coast is up by 40% whilst catches on the west are down 76% of their 1970 value. However, this data is flawed as it relies on percentage change of catch rather than the actual catch data. The changes are enhanced because 80% of Scotland's wild fish are caught from the east coast rivers and less than 20% from rivers around salmon farms. This is not unexpected given the size of the main east coast rivers as compared to the short spate rivers found on the west coast.

In July 2016, Marine Scotland Science posted a new report on their website in which they assess whether rod catch data from both coasts can be used to determine whether salmon farming is responsible for west coast declines. They state 'Broad scale comparisons of catch data (East/West, farming/non-farming) is not ideally suited to providing evidence of any impact of fish farming'. Thus Marine Scotland Science appear to suggest that data highlighted by Mr. Linley Adams and Mr. Graham Stewart is not a valid measure of the impact of salmon farming on wild fish numbers.

The previous written response submitted by Callander McDowell to the Committee highlighted a new study, the results of which are to be presented at the forthcoming international Sea Lice 2016 conference in Ireland in September. This study adopted a new approach in which catches were compared within the same fishery district. The comparison was made using catches from the 30 years prior to the arrival of salmon farming with catches for the 30 years plus after the arrival of salmon farming. This was repeated for all 61 west coast fishery districts and then for all the remaining fishery districts including those on the east coast.

The results show that salmon farming is not the primary cause of the decline in wild fish catches as Salmon & Trout Conservation maintain. Wild fish catches were in

decline long before salmon farming arrived on the west coast. In addition, sea trout catches are decline across the whole of Scotland not just on the west coast.

As previously highlighted. Salmon & Trout Conservation have ignored all attempts to discuss these findings, presumably because this study does not support their claims about the negative impacts of salmon farming.

17th August 2016

Dr Martin Jaffa
Callander McDowell

Annexe – 02 September 2016

The first paragraph of the background information to this Petition states:

Wild salmonids in the 'aquaculture zone' on the west coast are in trouble. In 2015, the Scottish Government published the latest classification of the country's salmon rivers' salmon populations, placing all rivers in the west Highlands and Inner-Hebrides, including river systems such as the Awe and the Lochy, in the worst-performing category, with wild salmon stocks not reaching their conservation limits (a measure of the overall health of the population). No river within salmon farming's heartland of the west Highlands and Inner-Hebrides has, in Scottish Government's estimation, a sufficient stock of wild salmon to support any exploitation

On the 1st September 2016, the Scottish Government released the new conservation grades for Scottish rivers including those along the west coast. Following their assessment, the Scottish Government has graded the rivers and fishery districts within the West Coast Aquaculture Zone as follows:

Grade 1 – 22 rivers and fishery districts in which exploitation is considered sustainable and therefore anglers are able to kill salmon for sport

Grade 2 – 35 rivers and fishery districts in which management action is required but mandatory catch and release is not required allowing anglers to kill fish for sport.

Grade 3 – 66 rivers and fishery districts in which catch and release is mandatory.

This means 57 rivers and fishery districts within the Aquaculture Zone can be exploited by anglers.

When Conservation Limits were first imposed last year by the Scottish Government, they did make it clear that they would be taking a cautious approach in the first instance. Now rivers and fishery districts have been properly assessed, their true status has become apparent. The reality is that many of the rivers and fishery districts are much healthier than as claimed by the STC. This new assessment clearly shows that salmon farms are not having the negative impact on wild stocks as STC maintain. In light of this new data, this Petition should be rejected.

Dr M R Jaffa
Callander McDowell

References: Andrew Graham Stewart, Wester Ross column, *Trout and Salmon Magazine* (Autumn 2016), p. 124