

PE1720/F

Fisheries Management Scotland submission of 9 August 2019

Thank you for contacting Fisheries Management Scotland will regard to the above petition on a natural flood alleviation strategy for Scotland. I note that the petitioner refers to recent trials in England and Wales, but it is difficult to assess the extent to which the petitioner is familiar with work currently being undertaken in Scotland.

Fisheries Management Scotland is the representative body for Scotland's District Salmon Fishery Boards and Rivers and Fisheries Trusts, including the River Tweed Commission. Many of our members are actively involved in a range of projects relating to the activities mentioned in the petition, such as riparian tree planting and installation of large woody material. These activities tend to be focussed on improving water and habitat quality and the health of our native fish and their associated fisheries, rather than flood risk management *per se*. However, if such projects are well-designed, these can have multiple benefits, including natural flood risk management. For example, riparian fence installation, and associated tree planting or green engineering to combat riparian erosion, can help to mitigate rural diffuse pollution. Targeted tree planting can provide dappled shade and, in conjunction with temperature modelling undertaken by Marine Scotland Science, is now being used to help cool our rivers and mitigate climate change induced warming. Installation of large woody material can provide cover and habitat for juvenile fish as well as providing deeper, cooler water. Finally, several of our members are involved in peatland restoration projects which can help to mitigate extreme water flows, reduce sedimentation in our rivers, and mitigate the impacts of commercial forestry. Equally, it is possible that poorly designed projects, which do not consider the needs of fish and fisheries, can have the potential to damage important areas for spawning or holding pools for adults. A catchment-wide approach, with the full involvement of fisheries managers, is therefore necessary. Further information on some of the projects being taken forward by our members can be viewed in our recent Annual Reviews¹.

The petitioner makes reference to the Flood Risk Management (Scotland) Act 2009 but does not make reference to the 14 Local Plan Districts in Scotland or the Local Flood Risk Management Plans which have been developed. These provide additional local detail on the funding and delivery timetable for actions between 2016-2021. Whilst Fisheries Management Scotland are not directly involved in this process, we consider that the local flood risk management plans are the appropriate vehicle for discussions about natural flood risk management. SEPA, as Scotland's strategic flood risk management authority, should be able to provide the Committee with more detail, and highlight the extent to which natural flood risk management approaches are incorporated into these plans.

Fisheries Management Scotland played an integral role in the Beaver-Salmon Working Group and is now a member of the Scottish Beaver Forum. The main purpose of this group was to develop the beaver management approach which has now been adopted by SNH, in recognition of the accepted damage that can be caused by the activities of beavers in relation to fisheries, agriculture and forestry. In particular, beaver dams have the potential to prevent Atlantic salmon and sea trout accessing spawning habitat or to delay the downstream migration of smolts, and it is important that fisheries managers can remove or notch dams where it is necessary to do so. This has already proved necessary in Tayside, particularly where dams are associated with man-made structures such as culverts and fish passes. The ability to mitigate these activities where it is necessary to do so is particularly important given the current concerns in relation to the conservation status of Atlantic salmon in Scotland.

The Cabinet Secretary for Environment, Climate Change and Land Reform, in agreeing that beaver populations in Argyll and Tayside can remain, made clear the basis on which this decision was taken.

¹ <http://fms.scot/wp-content/uploads/2019/03/FMS-2019.pdf>; <http://fms.scot/wp-content/uploads/2018/04/180404-Review-Final.pdf>

- The species will receive legal protection, in accordance with the EU Habitats Directive;
- Beavers will be allowed to expand their range naturally;
- Beavers should be actively managed to minimise adverse impacts on farmers and other land owners;
- It will remain an offence for beavers to be released without a licence, punishable by up to 2 years imprisonment and an unlimited fine.

If you require any further information on the issues highlighted above, please do not hesitate to contact me.