

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM THE FORTH DISTRICT SALMON FISHERY BOARD

The Forth District Salmon Fishery Board is located on the East Coast and covers the area of all rivers discharging into the Forth Estuary and Firth of Forth and includes the Estuary and the Firth. It has a statutory remit to protect and enhance the Forth Fishery for salmon and sea trout. Whilst the Forth DSFB does not have any marine fish farming in its District currently it takes an interest in national policy, how it impacts on other areas of Scotland and possible future pressures on the District. The Forth is a highly impacted area with 25% of the population and has significant issues of past and present industrial and infrastructure pressures. The majority of the rivers in the district (including the estuary) are currently category 3 rivers.

We note that the current presumption against development on the north and east coast of Scotland was discussed at the Committee meeting of 18th April. We support the presumption against further finfish farm development on the north and east coasts of Scotland to help safeguard migratory fish species. We also support the position of Fisheries Management Scotland, our representative body, that the current regulatory system does not sufficiently protect wild fish and we consider that a new regulatory system should be put in place prior to any growth in consented biomass.

The north and east coast of Scotland includes 12 rivers designated at SACs for Atlantic salmon or where Atlantic salmon is a qualifying feature in site selection, including one in the Forth District. The marine migration routes for these fish are largely unknown. Whilst some research has been completed, or is currently underway as part of strategic research relating to offshore wind farms, the risk of potential impacts from open pen sea cages on Atlantic salmon and sea trout populations is currently too high. We note that these concerns were also highlighted in the ECCLR Committee report and we support the view that 'in order to mitigate the risk of transfer of sea-lice, fish farms should be located away from salmon migration routes'.

The Forth District Salmon Fishery Board
April 2018