

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM THE SPEY FISHERY BOARD

The Spey Fishery Board was established under the 1862 and 1868 Salmon Fisheries legislation, subsequently amended and presently stated in the Salmon Act 1986 and the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003. There are 41 District Salmon Fishery Boards around Scotland, of which the Spey Fishery Board is considered to be one of the "Big Four", alongside the Tweed Commission and the Dee and Tay District Salmon Fishery Boards. The Boards are empowered under the legislation to take such acts as they consider expedient for the protection, enhancement and conservation of stocks of Atlantic salmon and sea trout.

We are writing in connection with the present inquiry into salmon farming around Scotland being conducted by the Scottish Parliament's Rural Economy & Connectivity Committee. The Spey Fishery Board notes 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 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 as Special Areas of Conservation for Atlantic salmon or where Atlantic salmon is a qualifying feature in site selection. The River Spey is one of these rivers, designated under the EC Directive on the Conservation of Natural Habitats and Wild Fauna and Flora 92/43/EC, for Atlantic salmon, otter, sea lamprey and freshwater pearl mussel. These rivers are, therefore, afforded the very highest level of environmental protection available within the European Union. In addition, the River Spey is also a Site of Special Scientific Interest (SSSI).

The marine migration routes for the Atlantic salmon in these rivers 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 Spey Fishery Board therefore urges the Rural Economy & Connectivity Committee to support the presumption against further finfish farm development on the north and east coasts of Scotland to help safeguard these important and iconic migratory fish species.

Spey Fishery Board
April 2018