



ATLANTIC SALMON TRUST

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Stewart Stevenson
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Dear Minister

The Atlantic Salmon Trust fully supports the response to this consultation provided by the Association of Salmon Fishery Boards, and submitted by Dr Alan Wells.

We also wish to take the opportunity to make certain additional points in relation to some of the questions posed. This document only answers questions where we wish to provide supplementary information.

Section 1: The sustainable development of aquaculture

Q1. Do you agree that we should, subject to appropriate safeguards, make it a legal requirement for marine finfish operators to participate in an appropriate Farm Management Agreement with sanctions for failure to do so, or to adhere to the terms of the agreement?

AST is particularly concerned that FMAs do not have any input from wild fisheries interests. We believe that the failure of Area Management Agreements to deliver the anticipated results was largely due to (a) the lack of statutory status (b) an unnecessary degree of secrecy in their operations, due to over-use of the principle of commercial confidentiality. We believe it is crucial not only that FMAs are operated in a more transparent way, but that monitoring data should be available on a publically accessible website

Q2. Do you agree that operators should have primary responsibility for determining the boundaries (and other management arrangements) for Management Areas, but with Scottish Ministers having a fallback power to specify alternative Areas?

We share ASFB's high level of concern over the suggestion that operators should decide the boundaries of Management Areas. We believe that operators will place pressure on regulators and planners to ensure that the boundaries of MAs conform to their business model rather than to sea lice dispersal patterns. However, we are also aware that many of the larger companies have a very robust approach to sea lice management, and that their efforts in this are sometimes frustrated by lack of control of biological management areas. We suggest that the Management Area approach, if properly administered, will also benefit companies in controlling lice. The Area Management system should be reorganised to ensure as a primary aim the maximum control of sea lice and disease.

This has particularly strong implications in Management Areas with several operators. AST is aware that there have been scenarios where Area-wide fallowing has not been possible due to the presence of smaller operators, who do not have access to alternative production sites in other MAs. We recommend that in order to have a licence to farm salmon, all operators must be able to demonstrate that they have access to a sufficiently wide geographical spread of sites to permit Area-wide fallowing

Q3. Do you agree that an independent arbitration process should be put in place (with statutory underpinning) to resolve disputes related to Farm Management Agreements?

Experience in Ireland with the Aquaculture Appeals Board has been mixed. In some situations where the management of a complex management area required compromise in relation to fallowing, an appeal by the wild fish interests proved successful. Some of the smaller farms were obliged to fallow for long periods of time and the integrated bay management system fell apart with the consequence of a very significant increase in sea lice levels. It is for this reason that we make the recommendation under Q2.

Q4. How do you think such a system might best be developed?

Review and adapt the Irish Aquaculture Appeals Board system

Q5. Do you agree we ought to review the question of unused consents?

We agree that there is a need for such a review. It is crucial in any such process that the objective should be, as far as possible, to limit the pressure on existing sites and utilise all available space – provided this does not lead to an increase in production biomass. Much alarm has been caused within the wild fish community by recent applications to relocate to unused consents, for instance in Seil Sound, where a very substantial increase in biomass was included.

Q6. What do you consider are suitable options to promote use or relinquishment of unused consents?

We are aware that some of the larger producers hold unused sites as 'buffer zones' to protect their own farms, and we echo ASFB's concerns if unused sites were to be the only way of ensuring fire-breaks. Management Areas should be biologically based, so that there are appropriate separation distances to render such use of unstocked sites unnecessary.

We would suggest that licensees of unused sites be required to make these available to other operators to facilitate statutory Management Area-wide fallowing, as mentioned in response to Q2.

Q7. Do you agree that Scottish Ministers should be given powers, ultimately, to revoke, or to require or request others to revoke, consents?

We strongly support ASFB's view that it is a major problem that such a power does not currently exist, and agree that there should be a mechanism for DSFBs and/or local communities to apply to Scottish Ministers for such a power to be used. In this context, we were disappointed to see that Scottish Ministers (via the Reporter) recently overturned Orkney Island Council's very sensible decision to permit restocking of the Cava South site for four years, with monitoring and review of the consent at that point.

We suggest that the powers to revoke consents could and should be introduced as part of the implementation of the Marine Strategy Framework Directive.

Q8. Should any such power relate to all or to particular consents (and if the latter, which)?

Such a power should relate to all consents for both marine and freshwater production. We believe it is particularly important that licences for open net pens in freshwater sites which are part of migratory systems can be revoked timeously. We support ASFB's call for such production facilities to be phased out, to bring Scotland into line with other salmon-farming countries in Europe and N America, and would draw Ministers' attention to the fact that the global Salmon Aquaculture Dialogue process, supported by both the industry and NGOs, has identified the existence of open net smolt pens in salmonid systems as unsustainable and unacceptable. We believe that the use of such facilities should be phased out within a stipulated time-frame (five years seems reasonable), since the technology to raise smolts in RAS systems is tried and tested and widely used elsewhere – and indeed is now being adopted by the larger Scottish producers.

Q9. What in your view is the most appropriate approach to be taken to the collection and publication of sea-lice data?

AST fully supports ASFB's answer to this Question. We would add that the solution to promulgation of sea lice data *must* be linked to a requirement that impacts on migratory salmonids (particularly sea trout at a number of key sites) are monitored in tandem with the spring sea lice control regime. These data also need to be publically available.

Q18. Do you agree that we should provide for additional powers for Scottish Ministers in relation to commercially damaging native species?

Yes; this should be linked in with the management of Natura 2000 sites and protection of SAC designated species.

Section 3: Fish farming and wild salmonid interactions

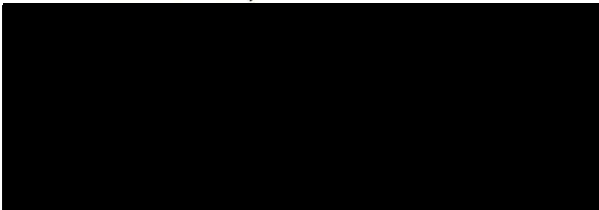
Q21. Do you agree we should provide powers for Scottish Ministers to require all finfish farms operating in Scotland to use equipment that conforms to a Scottish Technical Standard? (The technical content of the standard would be defined separately.)

Yes. We suggest that there is a need to link this to genetic monitoring of a selection of key salmonid systems to assess and quantify the actual impact of genetic introgression from both freshwater and marine cage sites.

We support ASFB's call for statutory marking of farmed fish, so that escapes can be monitored and attributed to the relevant producer and/or farm.

There may also be novel marking methods which are more acceptable to the industry than physical tagging, due to lower costs – see <http://www.atlanticsalmontrust.org/latest-news/chemical-tagging-of-fish-could-sort-out-the-farmed-from-the-wild-271.html> re recent work at the University of Oviedo on use of isotopes as tracers.

Yours faithfully



Anthony Andrews
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Atlantic Salmon Trust