

MIGRATORY FISH COMMITTEE BIENNIAL REPORT

Overview of the Committee's Work

The purpose of the Migratory Fish Committee (MFC) is to represent the public policy interests of SANA members, i.e. angling clubs and individual members.

Since the last annual report, the Committee has maintained its full schedule of meetings – mainly conducted online. Likewise, it has continued to participate in online meetings with government and has completed responses to public consultations on policy subjects which affect angling. For some of those subjects, we consulted members of the Non Migratory Fish Committee as well and representations were made on behalf of SANA as a whole.

Our key tests of the relevance of public policy subjects to angling have been:

- Does this issue affect stocks of wild fish?
- Are opportunities for members to fish improved or threatened by what is proposed?

Over the past two years, the issue of cleaning-up our waters has risen to the fore. Anglers and fishery organisations have felt isolated on this subject. Now, there is a lot of concern being shown by diverse interest groups - from wild swimmers to naturalists and anybody who can see that it is also a public health issue. Looking at the same issues in England, a recent report from the Westminster Parliament was scathing. It is on the radar here too, not least in connection to the next subject below.

The other headline development is that the Scottish Government now has a Wild Salmon Strategy. Step One has been completed. It is agreed to take action to recover salmon stocks. Step Two is to devise an implementation plan of specific (and measureable) actions to realise that ambition. In this process, SANA has been the sole participating member of the Government's Stakeholder Advisory Group whose job is to represent anglers.

In doing this work on behalf of our members, we have tried to be as open as possible. Our formal submissions are on the SANA website. Whenever time schedules permit it, they are published beforehand in draft form - so that members have the opportunity to comment as well as members of the committee.

Clean Water for Fish (and for anglers)

The principal context for SANA's efforts to highlight the problems with Scottish Rivers (and to some extent lochs also) has been the legal obligation on government and its agencies to review River Basin Management Plans. On a long multi-year cycle, these plans set the targets for improvements and oblige action to have them carried out.

SANA's substantial submissions to this process may be summarised as follows.

On what are the issues that must be addressed, in June 2021, in summary, we said:

- We are motivated by fundamental worries about the habitats for fish and the condition of wild fish stocks;
- Water quality is an obvious pressure point and inadequate waste water treatment is the primary cause, but it is not alone. Other point source pollution and diffuse pollution are also involved;
- Water quantity is an issue at certain times of year and more so in some places. The causes are complex but revolve around abstraction and diversion;
- Land use affects both the quality and quantity of water in rivers and lochs. Here expansion of forestry is especially a concern. However, well planned afforestation can be a plus factor;
- Heavy modification of water courses (hydropower, other barriers to fish migration and old “drainage” schemes) have created unnatural habitats but to some extent these can be restored; and
- Not least of the pressures on water quality and wild fish stocks has been the poorly regulated expansion of the salmon farming industry.

As a precursor to that work, we also commented on the subject of **Environmental Standards** in December 2020. This was an opportunity to lay bare the impact of point source pollution from Scottish Water’s Waste Water Treatment plants and Combined Sewer Outfalls. It was pointed out that measurement of these outputs is important (and missing) and would in itself enable identification of sites within rivers that are affected by point source pollution from those sources. It is just not good enough to categorise the health of rivers “on average”. The ambition should be to categorise parts of water bodies as well as whole water bodies.

We also took the opportunity to demand that old hydro stations be subject to the same compensation flow requirements as newer installations and to call for updating of the non-native invasive species list. Pink salmon (*Oncorhynchus gorboscha*) and emerging/potential crustacean imports, e.g. killer shrimps (*Dikerogammarus villosus*), should be added.

Another aspect of the subject was covered by an earlier SEPA consultation, to which we replied in April, 2020. This was on the subject of “**Significant Water Management Issues for Scotland**”. We expressed concern that water quantity had not been properly acknowledged as an issue, alongside water quality. In many places, water abstraction in itself has adverse impacts on fish habitats and it also contributes to water quality problems by reducing the dilution of contaminants. Competing land uses, e.g. by planting of trees, also contributes to lower flows in rivers.

The consultation provided another opportunity to repeat our complaints about Scottish Water as a point source polluter and to remind SEPA about its woefully lax regulation of salmon farming in coastal waters.

Finally, on this subject area, in October 2021, SANA replied to the Scottish Government’s consultation on the future form of **agricultural policy**.

We said that the future agriculture policy for Scotland would affect how land is used and for what purpose. Both of these outcomes can have profound implications for the quality of freshwater and coastal habitats in Scotland for fish – through both the quantity of water available and the quality (chemical composition) of its constituent parts.

Our particular concern was the amount of land which might be taken out of agricultural production and planted with trees, in large part influenced by a relatively new income stream, viz. carbon credits. The net effect could be a substantial loss of water volume to water bodies in Scotland. However, we also said that SANA is very much in favour of well-defined new planting as a positive contribution to water quality (buffering) and water temperature (shading).

Wild Salmon Strategy

Ministers published the Scottish Government's strategy paper on 14th January 2022. To read the text, see: [Scottish Wild Salmon Strategy - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/scottish-wild-salmon-strategy/pages/1-to-3.aspx)

In summary, the Scottish Government press release said:

“An ambitious strategy which aims to bring the wild salmon population in Scotland back from crisis point has been launched.

Atlantic salmon is an iconic species featuring highly among the wildlife readily associated with Scotland at home and abroad.

Salmon are affected by a wide range of pressures, some at sea, but many others acting within the Scottish freshwater and coastal environments. A key contributory factor appears to be climate change.

The strategy highlights five priority themes for action, including improving the condition of rivers, managing exploitation including the effectiveness of deterrents to poachers, understanding and mitigating pressures salmon face in the marine and coastal environment, international collaboration and developing a modernised policy framework.”

Open Cage Salmon Farms

SANA's approach to the vexed subject of salmon farming and its impact on wild fish has been to adopt a principled view that the industry can, and should be, reformed. This is in marked contrast to some bodies which have chosen the unrealistic path of calling for the industry to be closed down.

Crown Estate Scotland (CES) is the relatively new devolved body, now responsible to Scottish Ministers, which provides all the seabed leases for marine fish farms in Scotland. SANA is a member organisation of the CES Stakeholder Advisory Group.

We have advocated a new discipline to bring cowboy fish-farmers into line, those who have flouted restrictions on the number of fish they are allowed to raise. Our proposal is that these limits should be embedded in their leases. Thereby, instead of a telling-off, such miscreants would be in breach of contract and can be closed down.

It is our view that conversion to closed containment technology will require significant expenditure and we hope that CES will be successful in mobilising such funding as is required from both private, and if need be, from public spending also. It is everybody's interest, including CES, that this industry should move to sustainable production methods.

In September 2020, we responded to a Scottish Government consultation on proposals for **The Fish Farming Businesses (Reporting) (Scotland) Order 2020**. In our submission, we responded in similar vein to our views that had been set out in 2018 to the Scottish Parliament's Rural Economy and Connectivity Committee.

We called for upgrading of the industry's production technology (i.e. closed containment) and for an obligation to use triploid stock in any remaining open net rearing systems. The latter measure seems the only way to prevent further introgression of farmed fish DNA into wild salmon stocks.

Further, we sought regulation of fish farm sites, advised by Marine Scotland and enforced through Crown Estate Scotland. This was to ensure that, in the short term, open cage systems would have least environmental impact.

North Atlantic Salmon Conservation Organisation (NASCO)

SANA is an approved Non Government Organisation, participating in the international reviews and meetings of NASCO. In recent times, such meetings have been held online. The subject material has focused on the conservation of wild Atlantic salmon stocks, now vastly overtaken by massive production of farmed salmon, grown to market size almost entirely in coastal cage farms – as noted above. Many of the environmental concerns which we have are shared with anglers in other countries and NASCO is the most effective vehicle for holding our respective governments to account.

Analysis of Salmon and Sea Trout Catches

Each year's official catch statistics are examined by the Committee, so that they and SANA's members at large may be better informed. Scottish rod catches of salmon and sea trout in 2020 were affected by a substantial period of Covid-related travel restrictions. The total for wild salmon catches was 45,366 and 93% were released. This is the third lowest total on record and 92% of the previous 5-year average. While the figure was down a little on 2019 catches, it remained higher than the all time low point of 2018.

There are fewer netting stations in operation than hitherto and the moratorium on netting by fixed engines from 2016 has been extended indefinitely. Despite the known pressure on salmon stocks, commercial net fishing continued - with an increased catch, all from net and

coble fisheries. In 2020, 21% of wild salmon killed in Scotland were caught in nets –up from 14% in 2019.

While we have viewed net fishing as an important pressure on fish stocks, especially sea trout and spring salmon, it is now not mainly a Scottish problem. Rather, we suspect that most impact of netting on stocks comes from killing of sea trout of Scottish origin by nets in the North East of England. Following lobbying, chiefly through SANA’s involvement in NASCO meetings, the North of England drift net fishery closed after the 2018 season. However, the North East of England fixed engines continued to operate from 2019, albeit with a requirement to return salmon. However, their wholesale slaughter of many thousands of Scottish sea trout remains a huge concern. Previous genetics research has shown that English nets impact on stocks in Scotland, especially sea trout. The numbers and the high average size of the sea trout indicate their killing of Scotland’s broodstock on a grand scale. A proposed extension of the net season in 2020 was withdrawn by the Environment Agency, following representation by many bodies, including SANA.

MEMBERSHIP OF THE MIGRATORY FISH COMMITTEE

J Pirie	Sec	Aberdeenshire	2021	8	8	*
A Walker	V-Ch	Pitlochry	2021	8	8	*
W Balfour		Brechin	2022	1+7A	8	*
J McKay		Perth	2022	4+3A	8	resigned
O McLennan		Fortrose	2022	6	8	*
J Stephen		Aberdeen	2022	3+4A	8	*
R C Campbell	Ch	Edinburgh	2023	8	8	
R Picken		Irvine	2023	8	8	
F Wight		Hawick	2023	6+2A	8	

Above, for each member, are shown the number of meetings attended and the number which could have been attended from December 2019 to September 2021. Apologies tendered are also shown. Members who stand down from the committee at the 2022 AGM are marked with an * and are eligible for re-election

The number of committee members is below the eighteen allowed for. Although the present membership is reasonably spread over the country and several members also take an interest in rivers some distance from their homes, new members would be most welcome, especially ladies and younger members. The Committee membership is mainly of retired gentlemen who are well aware of the pathway to the present state of our fisheries but the perspective of other groups could be worthwhile.

In contrast to its early years in the late 1980s much committee work is now completed between committee meetings by e-mail with attachments and accessing online documentation. Thus members can make essential contributions to committee work although unable to attend

meetings, usually four times a year in Kinross.

Craig Campbell
28/01/22