

Consultation response from MFC on behalf of SANA

Subject: Proposals for a risk-based framework for managing interaction between sea lice from marine finfish farm developments and wild Atlantic salmon in Scotland

Responses to certain questions contained within a SEPA consultation (name above). <https://consultation.sepa.org.uk/regulatory-services/protection-of-wild-salmon/consultation>

Q9. Which groups and organisations do you think we should include on technical advisory groups to assist us with the development of the detailed working arrangements and methods needed to implement the framework?

SANA is concerned that previous regulatory regimes have had a large element of self-control by the finfish farming industry. Given the evidence on fish escapes*, as well as on the current subject of sea lice levels on fish open sea cages, this doesn't work.

It is essential that all interested parties should be represented on the technical advisory groups and that these groups should have a supervisory role in evaluating the regime after implementation. As well as Fishery Management Scotland covering the national picture, in each affected area Salmon Fishery Boards and/or Fishery Trusts should be members of the groups and financed for the costs of fulfilling that role. We note Professor Griggs' recommendations on the regulatory regime and suggest that the income from licence fees be used for this purpose.

**Escapes of farmed fish cause introgression - harm to the genetic integrity of local salmon stocks through hybridisation at spawning. This could be prevented by obliging fish farm licensees to use triploid stock when using open cages.*

Q18. Do you think the design of the proposed framework, or how it is implemented, could affect your community or business interests?

Yes in a positive way Yes in a negative way I'm not sure No

Please outline what you think the effects could be and why?

Yes, in a positive way. However, changing production technology to closed containment – in sea cages or on-shore facilities - offers the prospect of a substantially better solution to the sea lice problem. It would also remove the impact of fish faeces and farm chemicals on the marine environment. Additionally, it would provide a solution to the substantial deaths of stocked fish due to impacts from toxic algae and from jellyfish. That may be the biggest driver of change but we would also support public spending to aid adoption of closed containment.

Further, it is regrettable that the reference to sea trout (brown trout which have migrated to feed in salt water) on page 13 of the consultation document says that their plight is not worthy of consideration for lack of evidence. Mature sea trout are progenitors of offspring which can be either sea-going or not. Therefore, it is a matter of concern that the consultation fails to consider the impact of sea lice on populations of both sea trout and brown trout in Scottish waters.

The reasoning behind the proposed protection zones appears to be that salmon need of protection in these areas – because their numbers are well below historic levels in those places. Since pointers are that sea trout have been in greater decline in salmon farming areas

of the west coast than on the east coast where there is little salmon farming, the concept of zones for sea trout should be capable of delivery.

Absence of evidence cannot be relied on for justification of the inaction indicated at paragraph 9.1 of the consultation paper. There is plenty of photographic evidence on the internet of immature sea trout being severely impacted by sea lice infestation, both here and in Norway.

In any case, absence of evidence is not the same thing as evidence that sea trout are not being impacted. The precautionary principle should be applied.

Marine Scotland Science, with fishery boards and trusts, has developed a considerable body of knowledge on sea trout over many years. We do not accept your assertion that at paragraph 9.2 that “there is very limited information on the status of sea trout populations in Scotland”. There may be greater knowledge about salmon but the results of decades of research on sea trout are not insignificant.

From the official catches data, we note that sea trout catches in the areas of the proposed protection zones have fallen away to a greater extent than the corresponding salmon catches. Therefore, it may be that sea trout stocks will benefit from “salmon” zones. We suggest that sea trout zones should also be considered.

No salmon protection zones have been proposed for Orkney and Shetland where there are open cage farms, few salmon catches and significant sea trout catches (historically). *The 2020 rod catch for Shetland was 167 sea trout released and 41 kept. Also, 440 finnock were released and 197 kept. Best year for sea trout was 1,739 in 1985.*

Q21. Do you have any additional feedback on the proposed framework?

SANA has no locus or expertise which would justify comment on the technical aspects of this consultation. On behalf of the angling community, it is important to record that the central purpose of the reforms has our support as a means of tackling a particular problem arising from open cage fish farming. However, it is like a sticking plaster to cover a deep wound.

We believe that the long term development of the industry lies in the direction of partial or whole term closed containment. Only then, can we be confident that the industry will be sustainable in terms of its impact on wild fish and on the wider marine environment.

11/03/2022