SUBMISSION FROM THE SCOTTISH SEA ANGLING CONSERVATION NETWORK (SSACN)

Introduction

The Scottish Sea Angling Conservation Network (SSACN) welcomes the opportunity to submit a response to the Inquiry into the Scottish Government’s Renewable Energy Targets.

We are not qualified or have the remit to answer many of the questions but feel strongly about (c) Planning and consents:

- Is the planning system adequately resourced and fit for purpose?
- How can national priorities be reconciled with local interests?

The Scottish Sea Angling Conservation Network (SSACN) is a conservation organisation which provides its membership with a unified, coordinated and comprehensive approach to international, national and local conservation issues which may affect recreational sea angling in Scotland.

Amongst other activities SSACN also operates the Scottish Shark Tagging Programme (www.tagsharks.com), a cooperative tagging programme that collects data on vulnerable and critically endangered elasmobranch species around Scotland. The data from this programme plays a key role in our response to offshore wind proposals.

Areas of Concern

SSACN have several concerns about the Scottish Government’s drive towards developing offshore wind installations around Scotland’s coastline, primarily due to the proposed locations of some sites.

One of SSACN’s major concerns is the potential long term impact of electromagnetic fields, generated by installations and their associated cabling, on sharks, skate and rays in Scottish coastal waters. Elasmobranchs are more sensitive to electric fields than any other animal and they rely heavily on this sense during migration and hunting.

Elasmobranchs are often apex predators in their environment and are vital to the marine ecosystem. Many shark species are targeted by sea anglers on a catch-and-release basis and form the cornerstone of a lucrative recreational sea angling industry in Scotland.

In 2009 it was shown that the recreational sea angling sector in Scotland is worth over £140m/year and supports in excess of 3,000 jobs.

The local economies of many rural areas of Scotland are heavily predicated on sea angling. SSACN are concerned that offshore wind farms could have a detrimental impact on populations of elasmobranchs and other fish species.

This image shows a Tope shark caught in Luce Bay on the south-west coast of Scotland. The sharks migrate to Scotland each year and are integral to a lucrative recreational fishery carried out on a catch-and-release basis. No information is available on how species like this may be impacted by offshore wind installations.
around important recreational angling sites in Scotland.

Gaps in Knowledge
No research is currently available on the potential impacts of offshore wind installations on behaviour, migration patterns, or breeding cycles of elasmobranchs in Scottish waters. The scientific paper “Environmental and Ecological Effects of Ocean Renewable Energy Development” by G.W Boehlerrt and A. B Gill stated that:

“Fish that migrate through areas where renewable energy devices will be deployed may be affected. Behavioural effects resulting from electromagnetic fields or acoustic signals, or a combination of such stressors could impact movement patterns of these species.”

SSACN wrote to the co-author Dr Andrew B. Gill PhD - who is widely acknowledged as one of the UK’s leading academics on wind turbines and their effect on the marine environment - expressing our concerns about wind farm installations potentially serving as a barrier to the migration of vulnerable shark species around Scotland. In his reply he stated:

“I understand your potential concern and wish I could provide you with an answer. Unfortunately we know far too little to be able to make any kind of judgement about things like migration barriers. You are right to raise it as a question, from available evidence we know that some benthic elasmobranchs can respond to subsea cables.

“However this is the first study of its kind so we are woefully lacking in evidence and research is limited mainly because funds tend to go more towards birds, marine mammals and species of conservation designation. There is obviously much more understanding required so the only way forward is to keep asking questions until there are clearer answers.”

Other concerns include the short and long term impacts of EMF, noise and vibrations on marine life - including marine mammals and migrating salmonids - during construction, piling and turbine operation in areas such as the Firth of Clyde (W4) and Moray Firth (NE1) which is home to a large population of bottlenose dolphins.

Case Study - The Outer Solway
This map shows the scoping area for the Outer Solway wind farm and SSTP shark tagging data from the area.

Our concern is that the scoping area cuts across one of the most prolific, popular and valuable recreational sea fishing grounds in Scotland.

Sea angling contributes over £23.79m to the region every year, a large proportion of which can be attributed directly to Luce Bay and the surrounding area.

Conclusions
Without the appropriate research, installations must be planned using theoretical environmental impact assessment, an unsound and irresponsible basis. Further to this, it
would appear politicians are allowing commercial exploitation and expedience to take precedence over recreational and ecological interests of national importance.

Perhaps most significantly, without the appropriate research offshore wind installations may be developed to the detriment of marine ecosystems and the rural areas of Scotland dependant on a healthy marine environment.

In 2010 SSACN recommended a precautionary approach to wind farm development until the necessary research was carried out and we stand by this statement. We must not sit back and watch whilst development takes place to the detriment of Scotland’s inshore fish stocks and shared marine resources. As has been seen so many times before - with one local example being the Firth of Clyde - once they are gone, they are gone.

Scottish Sea Angling Conservation Network (SSACN)
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