Written submission from the Scottish Anglers National Association (SANA)

Introduction

SANA is the recognised governing body for game angling in Scotland. This submission has been prepared by SANA’s Migratory Fish Committee.

While some game angling is dependent on stocking of waters with fish reared by the aquaculture industry, most game angling in Scotland has quarry species that are wild fish, principally salmon, sea trout and brown trout. Our policy interest is that wild fish populations should provide sustainable fisheries for recreation. To that end, the relevant parts of the Bill’s provisions are 1, 2 and 5.

Part One

Tension between angling and finfish farm aquaculture arises from their distinct interests. Anglers want abundant stocks of wild fish, as quarry species from which they can take a harvest or exploit for recreational purposes, as “catch and release”, or both. Owners and employees of freshwater fisheries depend on sustainable fisheries for their livelihoods. Additionally, there is a multiplier effect in other sectors whose output is purchased by anglers, especially those visiting an area who are normally resident elsewhere.

From an angling perspective, lowest cost farm production of salmon imposes unacceptable burdens on the natural environment which severely damage wild stocks of salmon and sea trout. Because farmers are not charged for their use of the environment and their impact on wild stocks, their perspective must be quite different. Theirs is an industry that competes in world markets against other production sites, which are also not charged for environmental impact. Nonetheless, salmon farms generate employment in rural areas and through their purchases and processing of the end product contribute to value added in other sectors of the economy as well as their own. Therefore, there is a clear public interest in the continued development of environmentally sustainable aquaculture in Scotland which is as valid as the public interest in sustaining wild fish populations.

The principal negative impact of fish farming is effects on the water environment, both in fresh water, where juvenile fish are produced, and sea water, where fish are grown on to marketable size. The potential pollution burden at production sites is twofold, through water quality (chemical pollution and decay of surplus food and faeces) and through providing an artificial habitat for parasites (eye-fluke, tapeworm and lice) whose population explosions impact on wild fish (salmon, sea trout and trout), particularly on juveniles. The concentration of farmed fish also presents an opportunity for disease hotspots, as with other intensive farming.

Both freshwater and saltwater impacts could be avoided through use of closed production systems, i.e. fish farms separated from natural freshwater and sea water.

1 While sea trout are migratory fish, it should be noted that brown trout and sea trout have not been shown to be genetically distinct. Sea trout are the progeny of trout which may, or may not, have been to sea. Therefore, the issues involved in safeguarding populations of migratory (sea) trout are liable to be also relevant to brown trout, and vice versa.
By abstracting water and treating effluent, these problems would not exist. However, such separation would not be lowest cost production systems.

The saltwater parasite element could be mitigated by rearing fish further offshore, beyond the region in which sea lice concentrations are most likely to be in the routes for migrating smolts and returning adults. Such a move would also aid dispersal of effluent and seems likely to reduce the cost of sea lice treatments. Again, such a solution is unlikely to represent a lowest cost production process.

The balance of public interest between conservation of wild fish and development of the aquaculture industry should be addressed through regulation and, where justified, by financial support of the industry. Overall, the Bill is helpful to our objectives. However, the central purpose should be to encourage the industry to “up its game”, through innovations that mitigate its impact on wild fish. The Bill addresses the regulatory issues (making Farm Management Agreements obligatory and introducing a statutory Scottish Technical Standard for fish farm equipment) but does not provide incentives for innovation by the industry.

To achieve fish farming companies’ improved environmental performance, we recommend that public support be provided for measures which go beyond legal requirements, including those created by this Bill, and/or exceed costs met by equivalent operations in other competitor countries. Closed containment of juvenile and adult fish would be an example of such innovation.

Escaped farmed fish are an additional issue. Farmed fish, which are poorly adapted for long term survival in freshwater and marine environments, can out-compete wild fish in fresh water, in the short term, through sheer force of numbers and larger body size. Also, they can reduce fitness of the remaining population through interbreeding, causing wild populations to decline and naturally selected genetic traits to be extinguished. Genetic sterilisation of farmed fish through triploidy would eliminate interbreeding with wild fish, should escapes occur. Even better, closed containment systems would avoid all of these problems.

From an angling perspective, preventing escapes of farmed fish, both juvenile and adult, is fundamental to minimising impacts on wild fish. A statutory requirement to take remedial action following reporting of escapes to Marine Scotland has been omitted from the Bill.

**Part Two**

The balance of exploitation of migratory fish, as between the commercial fishery (nets) and the recreational fishery, is addressed by the Bill. At issue is whether, or to what extent, netting (a primarily lethal fishery) is impacting on fragile stocks. The general policy framework in the North Atlantic area is that stocks should be managed on a case by case basis and that multi-stock fisheries are inimical to that process and should cease.

This concern was addressed by a Working Group, set up by the Scottish Government. Its recommendations focused on establishing the means whereby multi-stock fisheries could be identified and assessments made of their impact on different stocks. SANA supports the recommendation that there be a statutory
process of arbitration which, amongst other things, would provide fair compensation for curtailment of netting at certain times and/or places.

As drafted, the Bill omits that recommendation from the Group, viz. a statutory process of disputes resolution to deal with salmon conservation, management and any related compensation issues. The Scottish Government response to this issue, raised in the pre-Bill consultation, is: “The Scottish Government notes the mixed reaction to this proposal and will consider the issue as part of further work to modernise management structures for salmon and freshwater fisheries.” On our reading, that statement does not amount to any rebuttal of the case made for this measure in the Working Group’s report.

The recommendation arose from the need to have a process in place when the research on mixed stock fisheries has been completed. The Bill, as drafted, provides for the assessments of fishery impacts to be undertaken but not for a process to take action arising from the results.

At Section 22, the Bill provides powers to Ministers to introduce and operate a system of carcass tagging for wild salmon. Whether or not this applies to anglers as well as to netsmen, SANA supports this measure. However, the provisions are permissive as to what information such tags contain. We recommend that the Scottish Parliament amend this section to oblige individually numbered and recorded tags. Un-numbered tags would not enable verification of catch data, nor would it prevent illegal sales of fish from other parts of the United Kingdom (where tags are numbered) or of fish caught by rod and line (sales of which are banned by the 2003 Act).

**Part Five**

A detail of the Bill that should be addressed is the possibility of rod licensing, created by the proposed powers on charging. The Bill does not exclude rod licensing from the wide ranging powers to implement charging through secondary legislation. We understand that this was not an intention of the drafting and would be grateful for a clear commitment that this is not a purpose of the Bill.

SANA supports the current method of funding District Salmon Fishery Boards and would oppose a direct levy on anglers by central government. Such a levy would be a disincentive to participation in a healthy outdoor recreation which is second only to walking in Scotland. Also, it could be expected to impact seriously on jobs and businesses which are dependent on the many visitors to Scotland whose principal interest is angling.