



11.03.22

Migdale Smolt Ltd and Migdale Transport Ltd do not support the premise with which this consultation sets out. Namely, that this proposed framework has assumed that of the many challenges wild salmon may be experiencing at sea, that a threat from sea lice on farmed salmon is having an impact on wild salmon even although there is zero credible evidence to support that.

At this time of extreme global events and inexorably rising costs as a result, this proposal to add yet another level of burdensome bureaucracy to an already struggling food producing industry, is at best going to implement another level of constraint and at worst, significantly degrade and possibly destroy struggling smaller producers and all the relevant social and economic benefits that they bring to vast areas of the highlands.

We do not believe that there is any sound scientific evidence behind this proposal which appears to be based on pure conjecture. It seems irresponsible for another level of restrictions and regulations which appear to be based on unfounded claims to be created. If returning wild salmon statistics from MSS own data are to be correctly dissected, it can be seen for instance that when returning grilse are separated from the general population, that those grilse returns have been increasing!

Some of the challenges wild salmon may be experiencing at sea are being exacerbated by ill-informed government attempts and at ridiculous cost to the taxpayer. For instance, the ill-fated smolt tracking projects which have yet to come up with an answer but to those of us who have seen some of these clumsy and frankly brutal tagging projects in action, they are in complete contrast to fish welfare standards.

We note also that a Business Regulatory Impact Assessment in this consultation document, the purpose of which is to ensure that social and economic impacts of any new regulatory regime have been carefully considered, has not been included and this as discussed earlier has great potential to interfere with the business arrangements of particularly smaller operators with whom Migdale Smolt Ltd and Migdale Transport Ltd have close working partnerships, both downstream and up.

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