

From: [REDACTED] <[REDACTED]>
Sent: 14 March 2022 17:23
To: aquaculture.regulation
Cc: [REDACTED]
Subject: SEPA Salmon Framework consultation response from Orkney Trout Fishing Assoc.

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir / Madam

Please find below a response from Orkney Trout Fishing Association to SEPA's :

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

- This is a limited response given that the proposed framework relates specifically to wild Atlantic salmon.
- We would like to highlight that wild juvenile salmon have been found in at least one stream in Orkney, connected with the Loch of Harray, although it was some years ago and the current status of salmon in this system is unknown. Wild salmon have been caught occasionally in Harray in the relatively recent past. If further information on the historical occurrence of salmon in Orkney is required, then please don't hesitate to contact us.
- We welcome this effort by SEPA to introduce a robust system for the conservation of Atlantic salmon. We hope that a similarly robust framework can be developed soon for sea trout. The current situation regarding sea trout in Orkney is of great concern, with a serious and ongoing salmon lice problem at farms all over the islands.
- 23 separate watercourses in Orkney support sea trout populations.
-
- In developing a framework for sea trout, it is essential it should apply year-round, rather than a specific period, as is the case with the salmon framework. As stated in your consultation, sea trout, particularly smolts and finnock, are resident in coastal waters year round.
- It is important to note that sea trout are one of 81 Priority Marine Features adopted by Scottish ministers in 2014. It is critically important that this salmon specific initiative is followed by a sea trout specific equivalent.
- It is stated that sea trout may be able to avoid infestation by returning to freshwaters. It is unclear if this is being suggested as some form of mitigation. We are of the view that this strategy is undesirable, as it detracts from time when sea trout would otherwise be roaming freely and feeding around the coast. Moreover, in Orkney, freshwater systems are generally small so do not provide large areas of estuarine habitat which might be used by sea trout to rid themselves of salmon lice.
- The Orkney coastline is different to the sea lochs of the Scottish western and northern coasts. Scapa Flow in particular is a unique environment, being a large enclosed area of water with multiple entrances. It also hosts a huge tonnage of farmed salmon presently. It is critical that the sea trout framework relates to such areas as well as sea lochs and sounds.
- A recreational sea trout fishery has existed in Orkney for over 100 years. Sea trout fishing mainly occurs in the sea. Anyone can fish for sea trout within the open season and using legal methods. It is a true public resource. Although there is no direct income from sea trout fishing, it is cherished by the community and there are indirect economic benefits in terms of expenditure by local and visiting anglers.

- The salmon framework focusses on populations that are connected with SACs or that are significant in some other way, e.g. they support a fishery. The future sea trout framework must not ignore Orkney because it differs from the rest of Scotland. It could be argued that the public nature of the Orkney fishery makes it more deserving of protection!

We would be happy to discuss any of this in more details, particularly when it comes to developing the sea trout framework.

We would appreciate a confirmation of receipt of this email.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

Orkney Trout Fishing Association
Environment Sub Committee