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## **Aquaculture and Fisheries Consultation**

This is a joint response on behalf of the Cromarty Firth District Salmon Fishery Board and the Cromarty Firth Fisheries Trust.

### **General comments**

Whilst welcoming many of the proposed measures we would encourage Scottish Government to consider the overall delivery of fishery management in Scotland. The Fishery Board system has an important role, particularly in the enforcement of Scottish fishery legislation. However we believe that the most effective model for the management of freshwater fisheries is to have a Board working alongside and supported by a Fishery Trust. This is the model that we have adopted in the Cromarty Firth region and think that a Board and Trust working together to deliver the aims of a joint Fishery Management Plan provides the most cost effective management on a local scale for all fish species. It also maximizes financial resources available for fishery management as the Trust is able to access sources of finance not available to the Board and use them within its charitable remit for local public benefit.

Alongside legislative changes to modernise the Fishery Boards we would like to see further Scottish Government support for the development of fishery management by continued funding of Fishery Trusts and further coordination of applied research by Marine Scotland Science and Trust biologists. This coordination of professional scientific expertise on a national scale with the local knowledge and commitment of regional biologists and managers is very powerful and should be preserved and developed.

We believe that this approach will make the most effective use of available resources to manage wild fish stocks both locally and nationally.

### **Sections 1-3**

Whilst we do not have either freshwater or marine salmon aquaculture sites within our region we would fully support the response of the ASFB to questions 1 to 22.

In particular we are strongly opposed to the practice of rearing salmon smolts in freshwater lochs within any river system where wild salmon are present.

## Section 4

We are broadly supportive of the measures proposed as long as they do not lead to a disproportionate burden of bureaucracy or cost. We believe that many of the issues raised can be dealt with by the adoption and further development of the Code of Good Practice produced by ASFB in 2011.

Q23

Yes. By adoption of Code of Good Practice

Q 24

Yes. Would see this as pivotal to the delivery of the aims of the Bill

Q 25

Should be non-statutory initially and go through a period of further refinement.

Q 26

Yes. Would close a significant loophole in UK fishery legislation and should be introduced as quickly as is possible. Would also support additional powers for DSFB to introduce regional carcass tagging schemes for rod caught fish. Such schemes have been successfully piloted in several areas in Scotland and have been widely used in other countries.

Q 27

Yes. Would support additional powers for the sampling of fish and for collecting other data which may be required to strengthen the evidence basis for fishery management decisions. We would also like the inclusion of equivalent powers for DSFBs to enter onto land to collect fish or habitat data for management purposes. Boards already have such powers for the enforcement of fishery legislation.

Q 28

Support the ASFB response

Q 29

Yes. Only where evidence is clear that existing measures are inadequate.

Q 30

Yes. Entirely support the need for an evidence basis for the management of fisheries. This principle underpins our existing fishery management planning process. Would like to see this supported by the resourcing of the RAFTS network and by coordination of the activities and research programmes of; fishery trusts, Marine Scotland Science, SEPA and universities.

Q 31

Should be covered by a robust Code of Good Practice.

Q 32 -34

Support the ASFB response. Provided that this does not provide a disproportionate burden on boards and trusts in collecting data, would like to see a more coordinated approach to the collection and analysis of fishery data.

Q 35 – 36

See ASFB response, further emphasises the importance of an effective Code of Good Practice.

## **Section 5**

See ASFB response

## **Section 6**

Support the ASFB response and emphasise the current burden on Boards and Trusts in responding to and advising on an increasing number of applications for hydro and windfarm developments

## **Section 7**

See ASFB response

Yours sincerely

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& Cromarty Firth Fishery Trust