

Consultation Response to Marine Protected Area's consultation.

From:

Orkney Trout Fishing Association

OTFA Environment Sub Committee
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MPA's Consultation

Dear Sir Madam

Firstly I could not find this consultation online today. This may be because the deadline was yesterday - though I was unsure as the phrase "by 13th Nov" I had interpreted (possibly mistakenly) as meaning 12 midnight on Wednesday. If so, I do apologise. Quite frankly we struggle as volunteers to keep up with the incredible amount of consultations and supporting material afoot at the moment. How anyone can imagine these are reaching or being read by the general public in any kind of meaningful way is beyond me.

Orkney Trout Fishing association is, as you probably know, responsible for the protection and enhancement of wild Brown and Sea Trout and their habitat in the Orkney Island group. In the absence of any Rivers Board or Fisheries Trust we are the sole voluntary organisation responsible in the field of wild salmonid activity and have a regular membership of 500 local and visiting members.

It is our understanding that Marine Protected Areas are in principle a good thing as long as they do actually protect the species that they are designated to. It is also essential that currently sustainable commercial fisheries, eg crab and lobster creeling, scallop diving etc. are not inhibited in any way by MPA's, as quite a few of our members are responsibly engaged in such essential economic activity. Their livelihoods rely on sustainable practice as well as a clean and thriving local marine ecology which is good for them and anyone interested in a healthy marine ecology like us.

It is when we see scant mention of wild salmon or sea trout in your criteria for MPA's or any sort of recovery or protection that we do become suspicious. As far as the Rousay area MPA is concerned there are already at least three operating salmon farms as far as we can make out - though it is hard to keep up - as well as one new one in planning process just round the south end of Wyre, all of which have an influence on water quality in the immediate area. All of these are ridiculously close to the mouths of a number of historically well known sea trout spawning burns. Are you confident that current medicine use and nutrient enrichment etc. from these farms has no influence on the

conditions or sustainability of the Maerl beds?

It also seems rather futile to institute the MPA North and West of Orkney for Sand Eels, when the Scottish Ministers have an avowed intention of doubling farmed salmon production by 2020. It is patently obvious to us that the requirement of at least 3 tonnes of wild oily fish (sand eels) caught to produce one tonne of farmed salmon is the very definition of unsustainable practise - without even touching on the sea lice issue. Boats shall simply hang around the area mopping up sand eels as they move off the (in sand eel movement terms) relatively small MPA.

All this suggests that certainly in the West and North of Scotland, wild salmon and sea trout are actually way down the governments priority list when it comes to biodiversity - if they are on it at all. We remain extremely worried about the current and future survival rates of salmon and sea trout at sea in the hands of the global salmon industry, their ambitions for Scotland, and the way in which the government seem to be happy to facilitate them. If only more MPA's addressed this.

yours sincerely

Colin Kirkpatrick

Chair of Environment sub Committee
Orkney Trout Fishing Association