

Introduction:

The River Forth Fisheries Trust would wish to align itself with all the points made in the detailed response made by the Rivers and Fisheries Trusts of Scotland (RAFTS) and would wish its responses to the questions posed in the consultation to be recorded on that basis. The only exceptions to this being in the cases of questions 35 and 36 where we wish to make our own response as set out below:

Licensing of Fish Introductions to Freshwater

Q35.

**Do you agree that Scottish Ministers should have powers to recall,
restrict or exclude the jurisdiction of Boards in relation to fish
introductions, in certain circumstances?**

YES

(See following page)

Q36. If so, why and in what circumstances?

The River Forth Fisheries Trusty would wish to see a science-lead, robust and consistent approach taken to the issue of the regulation and control of all fish species, both migratory and non-migratory.

Where District Salmon Fishery Boards are making good decisions based on sound scientific advice to meet legitimate management objectives, and then subsequently monitoring the results of their activities in order to determine effectiveness, we believe that DSFBs are the most suitable organisations to have jurisdiction in this area.

However, it is demonstrably the case that there are a number of Boards who have carried out stocking/hatchery operations without any recourse to good quality science and who have continued those activities for long periods of time without monitoring the results of their operations in any way that would stand up to scientific scrutiny. In such instances we believe it is important that Scottish Ministers should have powers to recall, restrict or exclude the jurisdiction of Boards in this area in order to safeguard the long-term future of our natural heritage. Of their nature, hatchery operations impose risks on the fish populations that they seek to manipulate and if those risks are either not well understood or are ignored then Boards should not have powers to continue to impose them.

The observation is well made that MSS is the regulator in areas without DSFBs and importantly also for species of non-migratory fish. It should go without saying that the same burden of responsibility for good decision making with regard to fish introductions should rest with MSS and there are concerns that in the past MSS has not necessarily lived up to them.

We believe that Ministers should take powers to remove/limit the jurisdiction of Boards in this area where:

- i) A Board neither seeks or follows scientific advice.
- ii) A hatchery is run without a clear, justified, legitimate objective.
- iii) A hatchery is run without a clear and robust approach to monitoring hatchery activities.
- iv) Decisions to run hatchery operations are taken by Boards and are not competently and formally recorded and a matter of public record.

Further to this, we would echo RAFTS position that a detailed review of the regulation and practice of fish introductions as they are regulated or carried out by both the DSFBs and MSS is long overdue and urgently required.