

Orkney Trout Fishing Association

Secretary: Mr S Topp, Choin, Birsay., ORKNEY KW17 2ND

Pilot Pentland Firth and Orkney Waters Marine Spatial Plan. Planning Issues and Options and draft Environmental Report Consultation

25/07/13

Dear Sir / Madam

Orkney Trout Fishing Association (OTFA) attended the Marine Spatial Plan workshop held jointly between OIC, Marine Scotland and ICIT in early July in the King Street Halls in Kirkwall. We'd like to reiterate and add the following points :

1) In relation to Aquaculture we believe that Marine Scotland need to decide on a safe distance between salmon cages and sea trout spawning burns. Everybody (excepting some industry bodies apparently) now accept that there is a serious risk to wild salmonids from the artificially high levels of sea lice frequently found distributed on salmon farms. The massively disproportionate levels of this otherwise naturally occurring parasite, emanating from salmon farms, quite simply devastates unwitting wild fish populations. No amount of management or medicinal procedure can safely mitigate for this threat with increasing evidence of lice having evolved resistance to treatments such as Slice. Recently MS advised OIC in relation to sea based salmon farms and with regard to a proposed new aquaculture development (Cava South), that new sites should be at least 14 km away from wild salmonid spawning burns. A point that was either ignored or misinterpreted, as the development went ahead.

2)With respect to the above point there really needs to be a situation where siting and relocation of all current salmon farms is reviewed with regard to their proximity to, and influence on, wild sea trout spawning burns. Much new research and acceptance of the controversial link has emerged since most of these initial licenses were granted.

3) OTFA have done a massive amount of voluntary electro-fishing and survey work to provide the local authority with information allowing the mapping of all known local sea trout spawning burns. That provides an excellent premise to avoid future conflict with wild fish populations when it comes to marine spatial planning and proposed new salmon farms. A situation so far side stepped by the powers that be.

4) Orkney Trout Fishing Association are a one hundred year old, 500 member voluntary organisation who cherish and fight for the free access, effectively community owned, wild trout fishery which is almost unique in this nation. Many more local people enjoy that resource without being members. Free and responsible trout angling is engrained in our increasingly unique Orcadian identity, and therefore wherever psychological "well being" can be added to the list of criteria considerations in the document it should be. This was repeatedly mentioned at our table on the workshop day. It obviously also relates to cultural heritage, but increasingly I know

of people who have given up on their previous, often massive personal volunteer effort to try and protect our wild fishery from a sea of new development proposals, often from foreign owned companies providing foreign markets with what is effectively unsustainably produced salmon. This is a sad reflection on a much changed planning system that increasingly seems to exist solely to suit new political ends. It used to be considered our human right to fish for an easily sustainable wild fish and now lots of people are giving up because of damaged and lost populations of sea trout to badly located salmon farms. This does have a psychological effect on ones sense of well being and “quality of life”.

5) Another concern raised at our table at the workshop was that the voluntary sector is suffering from consultation fatigue and the constant barrage of lengthy and increasingly complex consultation documents. There is also a feeling that responses that go against current political will are routinely ignored and side stepped, to the point that it was generally agreed that the larger community in Orkney are totally disillusioned and disengaged with the whole concept of consultation. Similarly the increasingly rare members of the general public who have to find the time to do this are constantly up against an army of financially interested professionals only interested in “economic growth” or some other political agenda.

6) In an official survey carried out a few years ago, angling tourism was valued at £1.7 million per annum and is a valued part of Orkney’s existing and eminently sustainable portfolio of economic resources. This resource, because it already exists and provides valuable income to a whole range of businesses, needs to be protected when any proposed new developments – increasingly carrying the ominous attachment of “being in the greater national interest” - are put on the table.

7) In relation to the above, I have found that visiting anglers hold our cultural heritage and Orcadian “character” in high esteem as well as naturally associating the word “Orkney” with a relatively pristine and not overly developed land and seascape. It currently enjoys a fine balance of agricultural and wild land as well as partially developed sheltered coastline and large areas of beautiful and undeveloped coast – often epitomising the word “wild”. A massive and increasingly vulnerable asset.

8) Orkney Trout Fishing Association (OTFA), in the absence of any local Fisheries Trust or Rivers Board, are widely accepted as being the local organisation with a responsibility to, and active interest in, wild salmonids.

We want nothing more than a truly sustainable *and* responsible aquaculture industry that is willing to coexist with an increasingly rare, historically important and eminently sustainable wild sea trout population.

Yours sincerely

Colin Kirkpatrick

Orkney Trout Fishing Association
Environment Sub Committee chair.