



RIVERS & FISHERIES TRUSTS OF SCOTLAND
Safeguarding Scotland's Rivers & Lochs

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Shona Turnbull
Coastal Planning Officer
Planning and Development Service
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

16 December 2011

Dear Ms Turnbull

Preparation of updated Loch Ewe Aquaculture Framework Plan

Thank you for offering Rivers and Fisheries Trusts of Scotland (RAFTS) the opportunity to contribute to your update process for the Loch Ewe Aquaculture Framework Plan.

Formed in 2005, RAFTS is an independent freshwater conservation charity representing Scotland's national network of 25 Rivers and Fisheries Trusts and Foundations. Our members work across over 90% of Scotland's freshwaters to protect and develop our native fish stocks and populations by undertaking a range of activities including freshwater, river habitat restoration, fish and fisheries monitoring, research and education programmes. RAFTS is the membership organisation of the fisheries and rivers trusts operating in Scotland and is, itself, a charity and company limited by guarantee.

In the area of Loch Ewe, our member is the Wester Ross Fisheries Trust (WRFT) and we understand that they have made a representation to this update process. In addition the Wester Ross District Salmon Fishery Board (DSFB) and our sister organisation, the Association of Salmon Fisheries Boards (ASFB), have also provided submissions to you. RAFTS would wish to confirm our support made to the representations made to you by these bodies and further confirm the following key issues.

We acknowledge that salmon aquaculture is not the only cause of the decline in wild salmon and sea trout stocks. However, salmon farming poses some significant risks to salmon and sea trout stocks including:

- The transfer of parasites, most notably sea lice, from the farmed stock to wild stock;





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- Damage to benthic flora and fauna caused by waste feed and medicines; and
- Disruption of genetic integrity and local adaptations of wild stocks due to escapes from salmon farms

Given this position and the more detailed points raised by the ASFB, WRFT and the Wester Ross DSFB we do not believe that Loch Ewe is an appropriate site for fin fish aquaculture from a wild fisheries perspective. In addition this may also prove to be the case for other priority marine species such as mearl and horse mussel beds. Therefore, we believe that the updated strategy should, at a minimum, seek to contain the scale of operations at the existing site to its current level, until such time as the industry is able to move to closed containment or robustly demonstrate its ability to mitigate or manage the risks its operations present to migratory salmonid populations. We do not believe such mitigation or management of risk is currently possible.

On that basis we believe that the strategy should:

- Discourage the use of any aquaculture consents (if any) which are inactive or undeveloped.
- Ultimately, encourage the consolidation of existing finfish farming activity into another area and leave Loch Ewe free of finfish farming activity.

We look forward and would welcome the opportunity to being further consulted in the future as the Loch Ewe Framework Plan progresses.

I trust this summary submission is of assistance. Should you require further information or clarification of our position do not hesitate to contact me at any time.

Yours faithfully

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