

**Rhidorroch Estate
Ullapool
Wester Ross
IV26 2UB**

Andrew Wallace
Chairman
Rivers & Trusts of Scotland
CBC House
24 Canning Street
Edinburgh EH3 8EG

9th February 2013

Dear Sir,

Managing Interactions Aquaculture Project (MIAP)

Further to my [letter](#) dated 15 January, please find detailed below various concerns and questions regarding the [Managing Interactions Aquaculture Project](#) (MIAP). Unfortunately, I did not attend the RAFTS briefing on MIAP to the Wester Ross Area Salmon Fishery Board in Inverness last month so was not able to ask any questions in person. For the benefit of all river owners and fishery interests across the West coast of Scotland, hopefully you will be able to provide further details on this [controversial project](#).

1) How can RAFTS countenance salmon farming expansion in areas where sea lice infestation rates are already out of control?

As you know, I am the owner of the Ullapool River in Wester Ross which is threatened by sea lice infestation from salmon farms in the area. The latest regional sea lice data [published](#) by the Scottish Salmon Producers' Organisation details significant breaches of lice thresholds – including a 263% breach in [North Mainland](#) region.

Sea lice data obtained earlier this month via FOI also details infestation of wild salmon and sea trout across Scotland: infestation levels of up to 145 sea lice per fish were recorded in Shildaig in Wester Ross in 2012; up to 196 in Laxford in West Sutherland in 2008; 117 in Tarbert in Argyll in 2008; 113 in Sunart in Lochaber in 2008; and a staggering 1001 sea lice on a salmon sampled in Kanaird in Wester Ross in 2008.

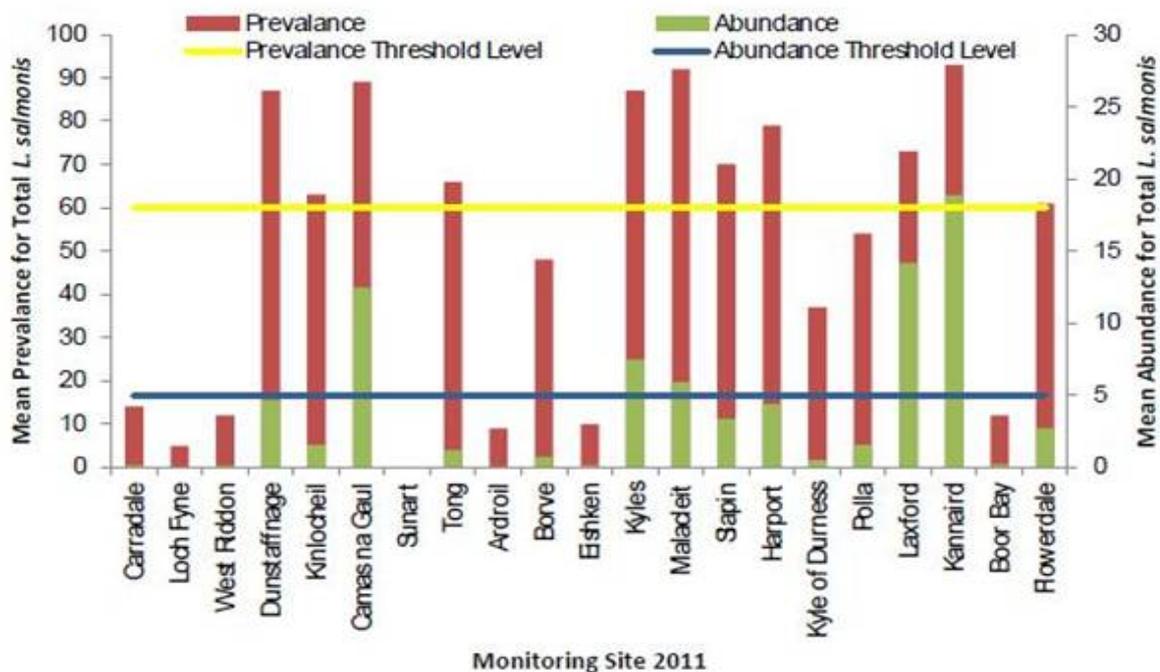
Out of over 11,000 wild salmon and sea trout sampled since 1997 there were 2,750 fish with 10 or more sea lice; 913 fish with 50 or more sea lice and 367 fish with 100 or more sea lice. By far the worst area was Dundonnell in Wester Ross which reported 40 out of the top 50 infestation rates (read the sea lice data in full [online here](#)).

A RAFTS report [published](#) in January 2013 detailed increased sea lice infestation levels on wild sea trout during 2012 compared to 2011. The report referred to an “increasing infestation pattern” and “[detrimental lice loads above critical thresholds](#)” with five monitoring sites experiencing extensive heavy sea lice infestations (epizootics).

2) Why is RAFTS ignoring the latest scientific evidence on sea lice?

Scottish Government research [published](#) in February 2013 revealed that sea lice from salmon farms impact wild sea trout up to 32km away. A scientific paper published by the [Royal Society](#) in November 2012 detailed how sea lice from salmon farms kill 39% of wild salmon.

A RAFTS report - [Managing Interactions Aquaculture Project: Sea Trout Post Smolt Monitoring Project Regional Report 2011](#) - published in April 2012 showed high levels of sea lice infestation of sea trout sampled in the vicinity of salmon farms.



The report detailed 93% sea lice prevalence at Kanaird in Wester Ross (1.5 km from the nearest salmon farm), 89% sea lice prevalence at Camas na Gaul in Lochaber (6km from the nearest salmon farm) and 88% sea lice prevalence at Dunstaffnage in Argyll (4km from the nearest salmon farm).

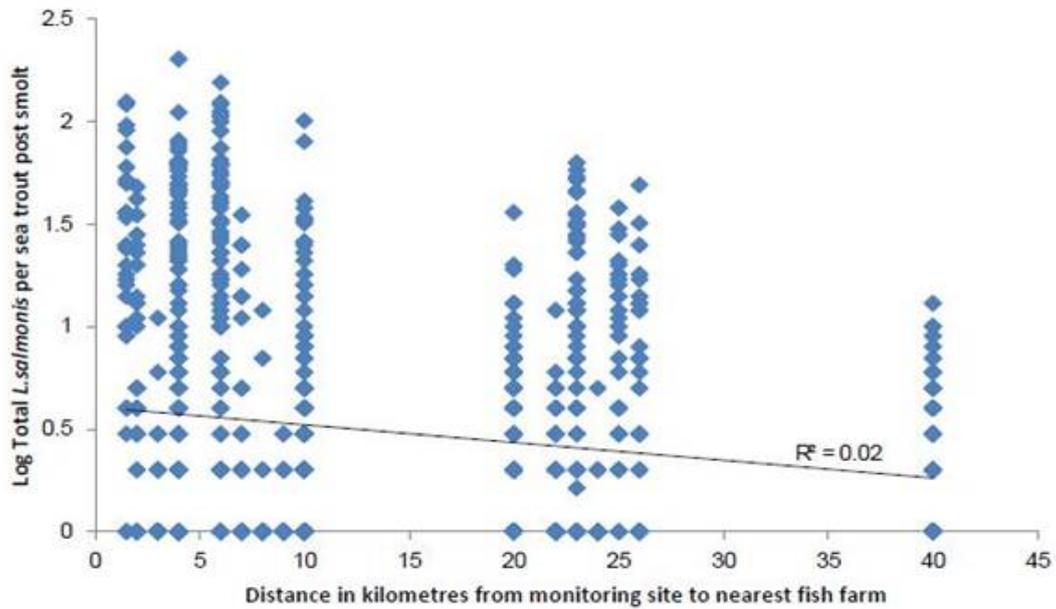


Figure 22 *L. salmonis* Log total per individual fish host for each monitoring site compared to the distance in km to the nearest active fish farm 2011.

Infestation levels of up to 130 sea lice per sea trout were recorded at Camas na Gaul (26.97 mean); up to 126 sea lice per sea trout at Laxford (44.69 mean) and up to 120 sea lice per sea trout at Kanaird (33.35 mean).

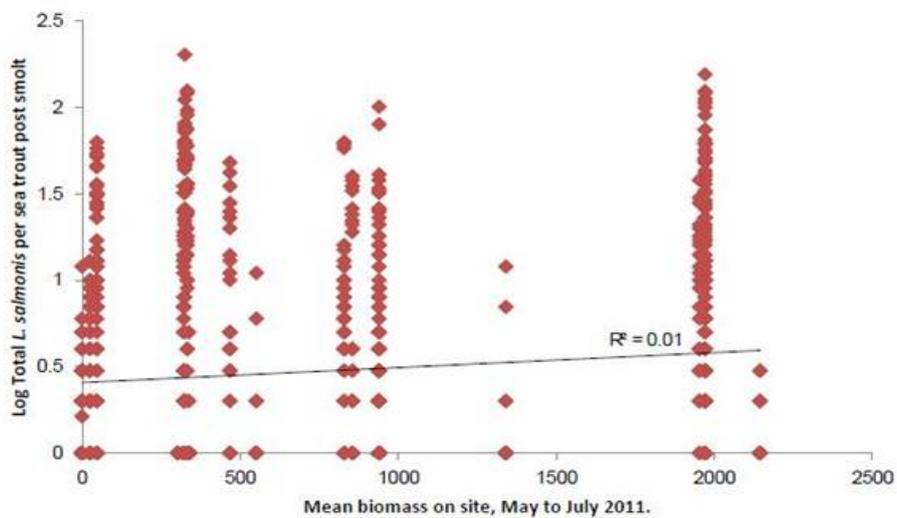


Figure 23. *L. salmonis* total per individual fish host for each monitoring site compared to the mean biomass on the nearest active fish farm for the period of May to July 2011.

The impact of salmon farms was detected at a considerable distance away from sampling sites.

Table 1: Monitoring Site Details.

Map Site ID (Figure 2)	Sweep Netting Site	Fisheries Trust	Number of Site Visits	Number of Sea Trout Caught 260mm Threshold	Current Distance to Active Fish Farm (Km)
1	Carradale	Argyll	2	36	9
2	Southend	Argyll	1	0	44
3	Machrihanish	Argyll	1	0	31
4	Loch Fyne	Argyll	2	60	24
5	West Riddon	Argyll	2	33	3
6	Dunstaffnage	Argyll	2	41	4
7	West Tarbert	Argyll	1	0	22
8	Laggan Bay	Argyll	1	0	62
9	Kinlocheil	Lochaber	8	100	20
10	Camas na Gaul	Lochaber	6	83	6
11	Sunart	Lochaber	9	8	10
12	Tong	Outer Hebrides	4	71	40
13	Ardroil	Outer Hebrides	4	11	23
14	Borve	Outer Hebrides	4	181	10
15	Eishken	Outer Hebrides	3	41	3
16	Kyles	Outer Hebrides	3	55	23
17	Malacleit	Outer Hebrides	3	26	25
18	Slapin	Skye	3	27	4
19	Harport	Skye	3	29	2
20	Kyle of Durness	West Sutherland	2	59	22
21	Polla	West Sutherland	3	33	7
22	Laxford	West Sutherland	2	41	4
23	Kinloch	West Sutherland	1	0	35
24	Kannaird	Wester Ross	2	28	1.5
25	Boor Bay	Wester Ross	3	31	8
26	Flowerdale	Wester Ross	2	36	26
27	Carron	Wester Ross	3	0	10
28	Gruinard Bay	Wester Ross	1	0	14

Table A9: Information on active fish farms in km distance bands to the monitoring site.

Monitoring Site	Number of Fish farm Sites up to 5km from monitoring Site Active in 2010/11	Number of Fish farm Sites up to 10km from monitoring Site Active 2010/11	Number of Fish farm Sites up to 20km from monitoring Site Active 2010/11
Carradale	0	1	1
Southend	0	0	0
Machrihanish	0	0	0
Loch Fyne	0	0	0
West Riddon	1	1	3
Dunstaffnage	1	6	9
West Tarbert	0	0	0
Laggan Bay	0	0	0
Kinlocheil	0	0	1
Camas na Gaul	0	1	2
Sunart	0	1	3
Tong	0	0	0
Ardroil	0	0	0
Borve	0	1	2
Eishken	2	3	5
Kyles	0	0	0
Malacleit	0	0	0
Slapin	1	1	1
Harport	1	1	1
Kyle of Durness	0	0	0
Polla	0	2	2
Laxford	3	3	4
Kinloch	0	0	0
Kannaird	1	1	4
Boor Bay	0	1	1
Flowerdale	0	0	0
Carron	0	1	4
Gruinard Bay	0	0	4

Read the 2011 RAFTS report in full [online here](#) – and compare with the [2012 RAFTS report](#) which has been sanitized (e.g. references to proximity to salmon farms have been excised).

Based upon all the scientific evidence and sea lice data, the only logical policy is to advocate for a blanket ban on salmon farms across the West coast of Scotland. Promoting larger ‘super-sized’ salmon farms in excess of 2,000 tonnes biomass will serve only to exacerbate sea lice infestation. Land-based closed containment salmon farming, as advocated by the [Atlantic Salmon Trust](#) and the Salmon & Trout Association, is the only way to stop the spread of sea lice to wild fish. RAFTS should be promoting closed containment not pimping for the salmon farming industry by paving the way for new sites.

3) Why is RAFTS endorsing the permanence and expansion of salmon farming on the West coast of Scotland but adopting a zero tolerance approach on the East coast?

A Ministerial Briefing – [“Managing Interactions – briefing on behalf of wild fish interests”](#) – dated July 2011 stated that: “The wild fish sector recognises the permanence and economic importance of the aquaculture industry to Scotland and the West Coast of Scotland in particular. We recognise the desire of Government and the industry to increase Scottish production.” RAFTS, ASFB, S&TA, AST and Fish Legal all supported this view.

In February 2012, RAFTS and ASFB reiterated their support for salmon farming on the West coast of Scotland via a [‘Policy Paper: Aquaculture’](#) (this document was also “supported” by the Angling Trust, Atlantic Salmon Trust, Fish Legal and Salmon & Trout Association): “ASFB and RAFTS recognise the permanence and economic importance of the aquaculture industry to Scotland and the West Coast of Scotland in particular.”

The support from RAFTS all the more shocking given [damning research](#) published by RAFTS itself in 2011 revealing a marked decline in catches of wild salmon in the salmon farming areas of the West Highlands and Islands compared to the East coast of Scotland where there are no salmon farms.

It is hard to escape the conclusion that RAFTS has sanctioned the expansion of salmon farming on the West coast in return for protecting rivers on the East coast. “The secret pact between fish farmers, Scottish civil servants, Crown Estates and river owners that consigned West Highlands and Islands wild fish to extinction, has been highlighted yet again,” wrote Bruce Sandison in an article titled ‘Secret Pact Exposed’ published in [The Salmon Farm Monitor](#) in April 2006. “Nick Yonge, clerk to the Tweed Commissioners, commenting on the decline in West Coast wild salmonids (5th April), said: “Our catches have remained good for more than a

decade. There was always an unwritten presumption against salmon farms on the east coast.”

Nick Yonge is now a [board member](#) of RAFTS along with representatives of West coast Fisheries Trusts who receive money from salmon farming companies and/or have salmon farmers on the board (Outer Hebrides Fisheries Trust and West Sutherland Fisheries Trust).



Management

Below is a list of board members:

- **Andrew Wallace** (Chair) – Co-opted Member from Fishmongers Company
- **Roger Brook** – Argyll Fisheries Trust
- **Mary Nicholson** – Galloway Fisheries Trust
- **Nick Yonge** – Tweed Foundation
- **Mark Bilsby** – River Dee Trust
- **Colin Adams** – Loch Lomond Fisheries Trust
- **Simon Scott** – Outer Hebrides Fisheries Trust
- **Patrick Fotheringham** – Forth Fisheries Trust
- **Brian Shaw** (Biologist Representative) – Ayrshire Rivers Trust
- **Shona Marshall** (Biologist Representative) – West Sutherland Fisheries Trust
- **Alan Williams** – Co-opted Member as Chair of ASFB
- **Ron Woods** – Co-opted member

“Two other sources substantiate the existence of this ‘presumption’ to keep fish farms from damaging Scotland’s big four salmon streams, Tweed, Tay, Dee and Spey,” continued Bruce Sandison. “The first came from Brian Simpson, of Scottish Quality Salmon. He was taking part in a BBC Radio Scotland debate with Lesley Riddoch (October 2002) on the decline in West Coast salmon. Lesley Riddoch pointed out that Norway kept salmon farms away their salmon rivers because of the harm they did to wild fish. Brian Simpson interjected, “Just a little point I would like to clarify here. We actually have agreed many years ago that the whole east coast of Scotland should not be allowed to develop salmon farming, that it should in fact be confined to the west.”

When Lesley Riddoch asked why, Brian Simpson replied: “Well, remember that we have got very big important salmon rivers over here, and again with the potential concerns of them, a decision was taken that we would not develop salmon farming on the whole east coast of Scotland.”

The second confirmation was made by Michael Forsyth (Scottish Secretary from 1995 to 1997), when he was complaining about a proposal to establish a salmon hatchery

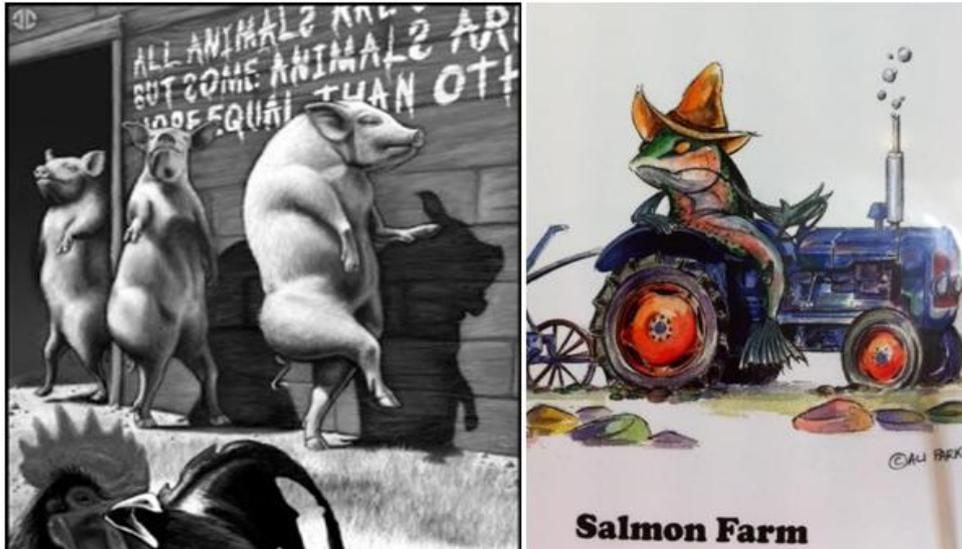
on the banks of the River Ettrick, a major tributary of Tweed: “When one of the Tweed's best Ghillies, Colin Bell, told me that a Norwegian company wanted to set up a smolt farm on the Ettrick within the Tweed catchment, I assumed he must be mistaken. There was an understanding, I thought, that no fish farms would be allowed in the East Coast,” he said (read more details [online here](#)).

4) Which rivers will be prioritised as more important than others?

It is understood that March 2013 is given as a deadline to publish a map ranking rivers in order of priority. As owner of a smaller river I am obviously concerned at the Ullapool River being sacrificed to accommodate salmon farming expansion. Indeed, I understand that similar concerns from the 68 river owners in Lochaber led to the Lochaber Fishery Trust withdrawing their support for MIAP. It is surely a dangerous precedent to rank some rivers and particular salmon stocks as more equal than others?



When the map is published in March it will be interesting to see which particular rivers RAFTS are prepared to sanction as expendable. As a river owner who pays an annual levy to RAFTS, I was under the impression that RAFTS was duty-bound to protect ALL rivers rather than engage in an Orwellian form of salmon-trading straight out of the pages of [Animal Farm](#).



5) What consultation did RAFTS undertake when launching MIAP in 2011?

Based upon my own experience in Wester Ross, it seems clear that there was a woeful lack of consultation regarding the original support for MIAP. For example, the support of Wester Ross Area Salmon Fishery Board has never been minuted nor properly explained. When Wester Ross Fisheries Trust originally agreeing to support MIAP, presumably in 2011, there were no minutes, no consultation, no scientific information circulated and no debate on MIAP. The original support in Wester Ross for MIAP by both the Board and Trust appears to have been agreed on a whim by a few influential river owners without proper consultation.

In fact, when the issue of support for MIAP was raised last month it resulted in WRASFB asking RAFTS to remove their name from the list of "partners". The RAFTS [web-page](#) for MIAP now reads:

A number of RAFTS members and related District Salmon Fisheries Boards support this programme. In the main, work will be undertaken by the participating fisheries trusts.

Project partners: participating fishery trusts and boards are:

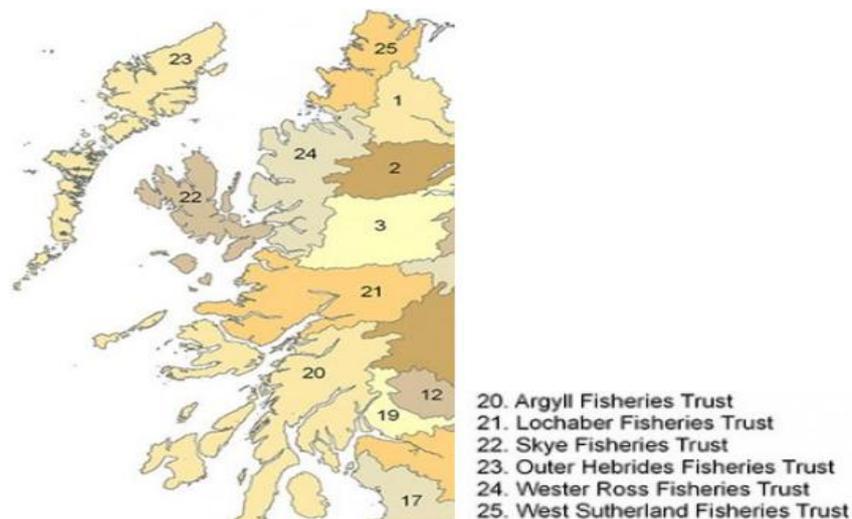
- Argyll Fisheries Trust
- Argyll District Salmon Fishery Board
- Wester Ross Fisheries Trust
- Skye Fisheries Trust
- Skye District Salmon Fisheries Board
- West Sutherland Fisheries Trust
- Outer Hebrides Fisheries Trust
- Western Isles Salmon Fisheries Board

Although original partners in the project in 2012/13, the Lochaber Fisheries Trust withdrew their participation in the locational guidance part of the MIAP on 09/01/13 having taken part fully in this and other areas of the project to that point and in the previous 2011/12 project. It is disappointing that they have withdrawn from the project at this time and in advance of a version 1 of the locational guidance map being prepared for review and consideration.

The Wester Ross DSFB, following the election of a new Board, have verbally indicated that they would prefer not to be listed as a project partner until after a meeting on 24/01/13 when the work will be presented to them by RAFTS and a Board position taken. RAFTS is advised that this is not a withdrawal of support at this time and the DSFB were listed in the project partners in the approved and funded grant application for 2012/13.

6) Now that both Lochaber Fisheries Trust and Lochaber District Salmon Fishery Board do not support MIAP how can the project proceed without information relating to rivers in Lochaber?

Lochaber is one of only six regions on the West coast of Scotland and MIAP will therefore have difficulty functioning without the support of both the Trust and the Fishery Board.



“The Lochaber Fisheries Trust (LFT), which covers one of the most dense fish farming regions in Scotland, said it had refused to co-operate with RAFTS amid fears its research is flawed,” reported [The Sunday Times](#) (13 January 2013). “Others have accused RAFTS of ‘selling-out’ to the Scottish government, which wants to increase farmed salmon production after striking a trade deal with the Chinese government. They claim the map will effectively rank Scotland’s salmon rivers in order of commercial importance and lead to smaller rivers being sacrificed for aquaculture expansion.....Diane Baum, the LFT’s senior biologist, said the trust initially backed the idea of locational guidance to ‘help steer fish farms away from the most sensitive areas’ but became concerned that the research is not sufficiently robust, in particular because the migration routes of young salmon and the dispersal of sea-lice from farms will not be considered.”



Campaigners say the conservation trust, which opposes fish farms, such as this one in Loch Ewe, is leading a government project to help their spread

Anti-aquaculture body 'aiding fish farm growth'

Mark Macaskill

A CONSERVATION body that opposes aquaculture has been criticised for leading a government-funded project that, critics argue, will aid the expansion of fish farms along the west coast of Scotland.

The Rivers and Fisheries Trusts of Scotland (RAFTS) believes fish farms pose a deadly threat to wild salmon and has been handed public money to identify the salmon rivers most at risk from aquaculture. The one-year project is due to finish in March when a "locational guidance" map is due to be handed to ministers.

On Friday, however, the Lochaber Fisheries Trust (LFT), which covers one of the most dense fish farming regions in Scotland, said it had refused to

co-operate with RAFTS amid fears its research is flawed.

Others have accused RAFTS of "selling out" to the Scottish government, which wants to increase farmed salmon production after striking a trade deal with the Chinese government.

They claim the map will effectively rank Scotland's salmon rivers in order of commercial importance and lead to smaller rivers being sacrificed for aquaculture expansion.

Concerns were raised last year when RAFTS asked its 25 members to provide data for the project, such as the number of juvenile fish, the rateable value of rivers and fisheries and habitat quality.

Diane Baum, the LFT's senior biologist, said the trust initially backed the idea of locational guidance to "help steer

fish farms away from the most sensitive areas" but became concerned that the research is not sufficiently robust, in particular because the migration routes of young salmon and the dispersal of sea lice from farms will not be considered.

"We agree some areas are more sensitive to fish farming than others and are resigned to the expansion of aquaculture along the west coast," said Baum. "However, wild fish interests are coming under pressure from the Scottish government to assess the risk of fish farms without proper data. In our view, bad data are worse than no data. We have made a decision not to be part of it."

Last week, senior members of RAFTS were contacted by The Sunday Times but refused to answer questions about the

locational guidance, part of its publicly funded "managing interactions aquaculture project (MIAP)".

However, in a letter to be published in Trout and Salmon magazine, the body will state: "The assertion that the project is intended to support aquaculture development is offensive and wrong... Political support for aquaculture expansion in Scotland is significant. The best option for wild fisheries is to prevent development in important and sensitive locations... The locational guidance part of MIAP will help with this."

A document published by RAFTS in July 2011 says a big "aspect of MIAP is a sensitivity analysis which will result in the production of locational guidance for planning marine aquaculture developments".

However, Jon Gibb, a member of the Lochaber District Salmon Fishery Board, said: "This will effectively rank rivers in order of importance."

"What on earth are we doing?" "RAFTS is, perhaps inadvertently, supporting the unsustainable expansion of aquaculture in onshore waters and ministers are buying endorsement from the wild fish community — what greater prize is there?"

Don Standford, an anti-fish-farm campaigner, said: "Instead of being a guard dog for wild salmon, RAFTS is rolling over on to its back and having its tummy tickled."

Salmon is Scotland's largest food export, with a global retail value of £1bn. In January 2011, the Scottish and Chinese governments signed a deal to export Scottish salmon to China.

"Wild fish interests are coming increasing pressure from the Scottish Government to assess the risk of fish farms without proper data," said Diane Baum, [Lochaber Fisheries Trust's](#) senior biologist, in an interview with [The Sunday Times](#). "In our view, bad data are worse than no data. We have made a decision not to be part of it."

[The Sunday Times](#) continued: "However, Jon Gibb, a member of the Lochaber District Salmon Fishery Board, said: "RAFTS is, perhaps inadvertently, supporting the unsustainable expansion of aquaculture in onshore waters and ministers are buying endorsement from the wild fish community - what greater prize is there?"

7) How does RAFTS respond to accusations of conflict of interest in terms of representation and financial support from salmon farmers?

My complaints against [Wester Ross Fisheries Trust](#) and [RAFTS](#) filed with the Office of the Scottish Charity Regulator raised concerns regarding a conflict of interest with the salmon farming industry (read more via "[Wild fish groups under investigation by charity watchdog](#)"). The Rhidorroch Estate has raised concerns regarding the conflict of interest at Wester Ross Fisheries Trust and the cosy relationship to the salmon farming industry since 2008 yet Marine Harvest remain on the board.

In fact, the current board of the Wester Ross Fisheries Trust includes a representative of both Marine Harvest and the Scottish Salmon Company. In their [July 2012 review](#), Wester Ross Fisheries Trust brazenly displayed the following financial supporters including the salmon farming companies Wester Ross Salmon and Marine Harvest (in addition to the [Royal Society](#) who in November 2012 published a damning [scientific paper](#) on how sea lice infestation from salmon farms was killing wild salmon!):

Supporters

The Wester Ross Fisheries Trust has been generously supported by:



THE ROYAL SOCIETY



In the January 2013 issue of [Trout & Salmon](#) magazine, James Mackenzie wrote:

“I was astonished when my hosts explained the make-up of the board of trustees of the Wester Ross Fisheries Trust. Of 12 trustees, most have fish-farming interests or connections or indeed actually work for salmon farming companies, including: Chairman John Mackenzie – owns Loch Tollaidh, where Wester Ross Fisheries have a smolt farm; Bob Kindness – his River Carron restoration project is funded by salmon farmers; Melanie Smith, University of the Highlands and Islands – monitoring of the River Carron restoration by UHI is partly funded by salmon farmers; Mark Williams – owner of the Sguod system, where stocking has been financed by Marine Harvest; Ben Hadfield – Marine Harvest; Henry Dalgetty – Scottish Salmon Company. Surely it is time for the charities regulator (OSCR) to investigate?”

Nor is the Wester Ross Fisheries Trust the only member of RAFTS infiltrated by the salmon farming lobby. The [Outer Hebrides Fisheries Trust](#) receives money from the salmon farming companies Marine Harvest and the Scottish Salmon Company. The [West Sutherland Fisheries Trust](#) also receives money from the salmon farming company Loch Duart and includes Loch Duart’s CEO Nick Joy on the board of trustees. Two trustees (Charles Marsham and Richard Osborne) also receive annual rental income from salmon farming companies.

In the January 2010 issue of Trout & Salmon magazine, Andrew Flitcroft wrote the following in an Editorial titled [‘The Enemy Within’](#):

“I daresay that most readers will be as shocked as I was to learn that all the fisheries trusts (FTs) in north-west Scotland count salmon farmers among their trustees. They are: Outer Hebrides FT - Derek Smith (Lighthouse Caledonia); West Sutherland FT - Nick Joy (Loch Duart Ltd); Wester Ross FT - Ben Hadfield (Marine Harvest); Lochaber FT - John Rea (Scottish Sea Farms); and Argyll FT - Derek Smith (yes, the same Lighthouse employee, although furtively listed here as representing the Scottish Federation of Coarse Anglers!). The reality is that the salmon-farming industry has

wheedled its way into the trusts as a means of neutering their ability to fight for wild fish -I know of a former trustee and salmon farmer that attempted to have a trust biologist fired for daring to voice blunt truths about the impact of salmon farming. Often their influence is backed by substantial financial support (some may consider it "blood money"), further compromising the trusts. Let's be clear, these trustees (from an industry which is hell-bent on expansion and which has the audacity to deny any responsibility for the demise of wild fish) represent the problem, not the solution. Surely it is time that the impostors were expelled or forced to resign forthwith. It is hard to imagine a more blatant or cynical conflict of interest."

Of the eight remaining "partners" of MIAP at least three - the Wester Ross Fisheries Trust, the Outer Hebrides Fisheries Trust and West Sutherland Fisheries Trust - are compromised via collaboration and financial support from the salmon farming industry.

8) How much is RAFTS being paid to sell wild fish down the river via MIAP?

A letter from Marine Scotland dated 16 March 2011 details a grant of £225,000 to RAFTS for the 'Managing Interactions Programme'. Another letter from Marine Scotland dated 27 June 2012 details a grant of £100,000 to RAFTS for the 'Managing Interactions Programme' to fund "further work on aquaculture locational guidance from a wild fish perspective." A 'milestone' of March 2013 is detailed for the "preparation of 'operating rules' / manual / guidance".

Has further funding been secured to extend MIAP? If so, how much?



In conclusion, wild salmon and sea trout are surely priceless and must not be sacrificed to make way for yet more sea lice-infested salmon farms on the West coast of Scotland. RAFTS must uphold its mandate to protect ALL rivers not merely those on the East coast and a selection of West coast rivers prioritised via MIAP. Please withdraw from MIAP immediately and protect all of Scotland's rivers from the threats posed by salmon farms.

Please pass this letter onto all RAFTS members. I have also copied in other wild salmon groups and government agencies.

Yours sincerely,

Jenny Scobie

Rhidorroch Estate

Cc: Association of Salmon Fishery Boards

Atlantic Salmon Trust

Salmon & Trout Association

Fish Legal

Angling Trust

Scottish Anglers National Association

Scottish Environment Protection Agency

Scottish Natural Heritage

Marine Scotland

Scottish Parliament Rural Affairs, Climate Change and Environment Committee