

Letter to Wester Ross Area Salmon Fishery Board from board member Jenny Scobie of the Rhidorroch Estate, 14 January 2013

----- Original Message -----

From: [Rhidorroch Estate](#)

To: [P. Jarosz](#)

Sent: Monday, January 14, 2013 5:26 PM

Subject: MIAP

Dear Peter,

As the WRASFB member looking into MIAP I would be grateful if you could send the above attachment to ALL board members and river owners in the WRASFB and WRFT area.

Due to the RAFTS presentation of MIAP being on the 24th January if it were possible to do as soon as possible and copy me in that would be great.

With thanks

Jenny

Rhidorroch Estate
Argyle Street
Ullapool
IV26 2UB

Tel/Fax 01854 612548
www.rhidorroch.com

Dear Members,

As the nominated WRASFB member for looking into MIAP, please find below my appraisal of the situation.

In summary, I propose that WRASFB withdraw their support immediately from MIAP. The ongoing support of WRASFB is all the more worrying given the withdrawal of Lochaber Fisheries Trust last week leaving the entire Lochaber region protected (Lochaber District Salmon Fishery Board have never supported MIAP).

At the current time, especially in view of LFT's withdrawal, there are simply too many unanswered questions and overwhelming concerns. The briefing by RAFTS next week (24 January) will obviously help provide more information but to maintain our public support is indefensible. According to the RAFTS [web-site](#), MIAP has 10 project partners (9 now that Lochaber Fisheries Trust has dropped out):

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

I propose that WRASFB write immediately to RAFTS asking them to remove our name from the list of partners/supporters. Following the publication in March 2013 of the final map/guidance ranking rivers, WRASFB will be in a better position to make an informed decision and can obviously re-affirm support should we consider it is in our interest to do so.

Please note that if WRASFB do not immediately withdraw support for MIAP I will be seeking advice from my solicitor with a view to legal action. I have a duty to protect the River Ullapool and I would hope that other WRASFB board members are willing to do the same. I will not sit idly by as the River Ullapool along with ALL the other rivers in Wester Ross is simply not expendable.

Please find enclosed below more specific reasons for withdrawal and outstanding questions. I look forward to seeing you next week.

Jenny

Reasons for WRASFB to withdraw support for MIAP:

Lochaber Fisheries Trust last week withdrew support for MIAP "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".

Diane Baum, Lochaber Fisheries Trust's senior biologist, said 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." (for more details read The Sunday Times article: "[Anti-aquaculture body 'aiding fish farm growth'](#)").

The science is simply not available to produce safe locations for new farms - such as sea lice modeling and sea trout, smolt tracking which SNH say are necessary for such an experiment as MIAP. RAFTS and ASFB admitted in a '[Policy Paper: Aquaculture](#)' (February 2012):

“Without a far better understanding of the coastal migration routes and habitats of wild salmonids it is impossible to plan aquaculture developments in a fully informed manner. Of particular strategic concern are the Sounds on the West coast, which have the potential to act as bottle necks in which migrating smolts are unable to avoid sea lice infestation.”

Recent peer reviewed research from St Andrews University B states with over 10 years of data that 39% smolts die from fish farm sea lice.

In the last 2 months a paper has been published by Marine Scotland that has collated all of the Fishery Trusts sea lice monitoring data over the last 10 years. It has concluded that fish farms have an impact of up to 32km from the fish farm. Therefore there is clear evidence-based indication that fish farms should not be located within 32km of any migratory system.

Lochaber District Salmon Fishery Board is not supporting MIAP. Due to the Lochaber area not being included in MIAP it is more likely that the increase of around 35 farms will be further distilled within WRASFB area by MIAP.

Wester Ross Fishery Trust has agreed to support MIAP - the RAFTS initiative supported and funded by the Government to increase the "growth" of aquaculture. However, WRFT has 7 trustees that have benefitted/derived an income or are directly employed by the fish farming industry – hence the recent complaint to the Office of the Scottish Charity Regulator (read the complaint [online here](#) and read more via The Sunday Herald: "[Wild fish groups under investigation by charity watchdog](#)").

RAFTS have asked WRFT as a wildfish organisation to give credence to MIAP by giving data from the WRASFB area. There is no evidence that this data has been consulted with or sanctioned by WRASFB. For example, there are no minutes available on any matter relating to MIAP from either the WRASFB or WRFT despite both organisations supporting MIAP.

MIAP is funded by the Scottish Government to the tune of over £300,000 - put in place by RAFTS who are using boards and trusts to give credence that it is a local wild fish initiative and thereby holding the doors open to planning for the rivers they deem to be expendable.

A few rivers will likely be regarded as "important" by MIAP the rest will be expendable and once the report is published it will be a foregone conclusion.

RAFTS cannot give clear indication of how they are to work the project - nor can they give details as to how the project is to be completed. Why has no draft of the mapping/ranking of rivers been published?

RAFTS are well aware of severe conflict of interest with the aquaculture industry in many boards and trusts (hence the complaint against RAFTS to OSCR – read complaint in full [online here](#)). Yet it is the boards/trusts that they have chosen for this project to increase fish farms on the west coast of Scotland.

WRASFB took the board area into MIAP without any minutes and on the surface with just John MacKenzie and Mark Williams members on both the board and the trust taking the lead.

Consideration by RAFTS appears not to be on the agenda regarding jobs, local employment, income to the area and loss of capital value and fishing for all the rivers that are deemed expendable.

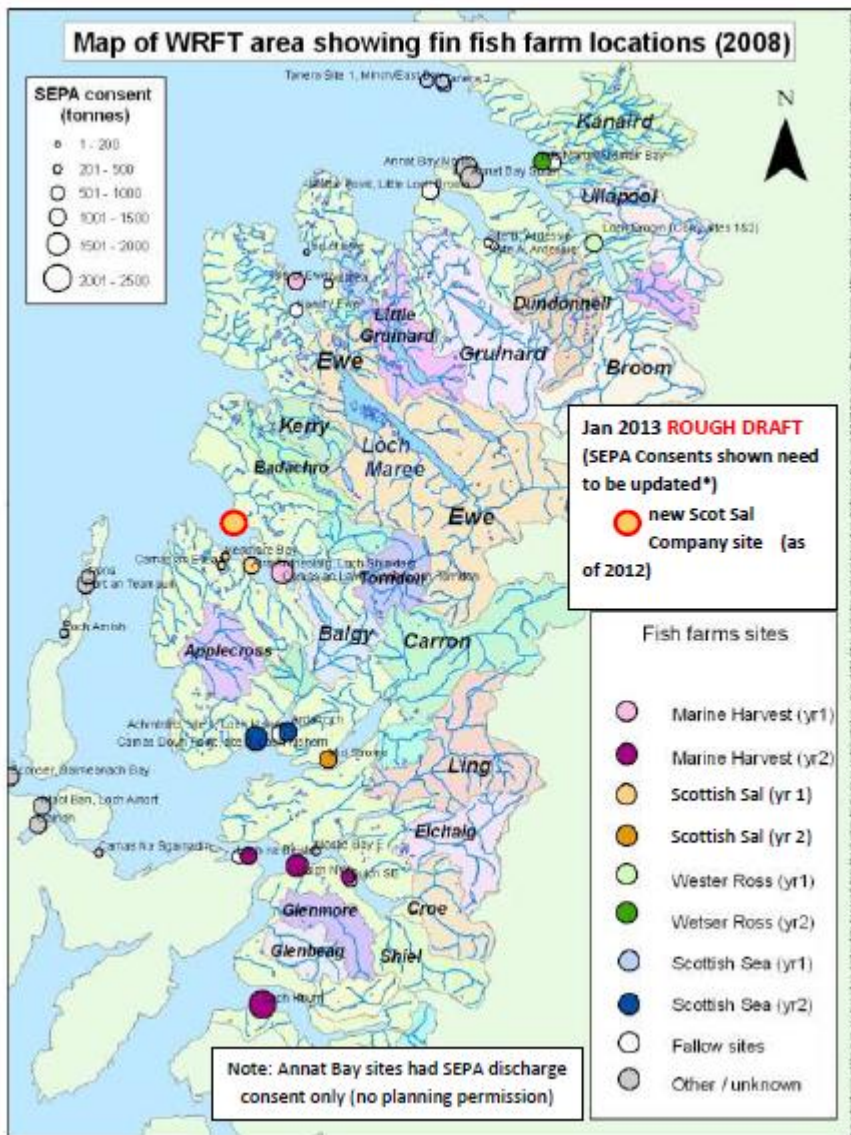
River owners have not been consulted on MIAP and the imminent MIAP presentation has been restricted exclusively to WRASFB members only. When briefed by RAFTS in December, the 68 river owners in Lochaber region were so horrified at the implications that they forced the withdrawal of LFT from support for MIAP.

Sea trout swim round the estuaries and have not been adequately taken into account by MIAP. For example, 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 Kannaird 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). 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 Kannaird (33.35 mean).

Supporting MIAP is tantamount to signing a death warrant for wild salmon and sea trout in Wester Ross.

Questions for RAFTS:

- Which rivers in Wester Ross are ranked the highest and which will be deemed expendable?
- Where exactly do you propose as suitable places to expand the existing salmon farms?



- Will the Rivers Ewe, Little Gruinard and Gruinard be ranked as higher importance than, for example, the Rivers Kaniard, Ullapool, Broom, Dundonnell, Kerry, Badachro, Torridon, Balgy, Applecross, Carron, Ling, Eichaig, Croe, Glenmore, Shiel, Glenbeag and Arnisdale?
- When a West coast of Scotland-wide ranking is performed, where will the River Ewe and River Gruinard, for example, rank compared to rivers in the Outer Hebrides, Skye, Argyll and West Sutherland?
- What are the implications for other regions and rivers following the withdrawal of LFT?
- Will more pressure be placed on Wester Ross now that LFT has withdrawn support?
- Why is the latest sea lice science and research being ignored?

For example, RAFTS itself in 2011 revealed 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. Not to mention the “highly significant” [scientific](#)

[study](#) published by the [Royal Society](#) in November 2012 detailing sea lice mortality from salmon farms.

How can you honestly say there is a 'safe' place to farm fish inshore if even the Scottish Government [admitted](#) in a paper published last year that sea trout are impacted up to a minimum of 31km away?