Rhidorroch Estate
Ullapool
Wester Ross
IV26 2UB
Scotland

Wester Ross Area Salmon Fishery Board
c/o Wester Ross Fisheries Trust Office
Harbour Centre
Gairloch
Ross-shire
IV21 2BQ

19 May 2013

Dear WRASFB members and river owners in Wester Ross,

Why the 'Managing Interactions Aquaculture Project' must be opposed

Further to my letter dated 14 January 2013 and letter dated 27 April 2013, please find enclosed below additional information in support of my proposal that that WRASFB withdraw immediately from the Managing Interactions Aquaculture Project (MIAP).

Please consider this a reply to your letter dated 14 May 2013 which asked for feedback on the "suitability of MIAP". It is concerning to read that the "the board was broadly encouraged" when it is blatantly obvious that MIAP is wholly unsuitable for the protection of wild fish. MIAP appears to have been specifically designed as a model to assist the development of salmon farming and is suitable only as a crude tool for rubber-stamping new sites.

It is recommended that WRASFB withdraw from MIAP for the following reasons:

1) Lack of Scientific Integrity:

Your letter of 14 May 2013 details a "Managing Interactions Aquaculture Project: Briefing Paper for Wester Ross DSFB" (April 2013) – including the following statements pointing to alarming gaps in scientific research:

- It would be desirable to include Information such as smolt migration routes within the model. However, this data does not exist. This is likely to be the case for many years.
- It would be desirable to include data and information on sea lice dispersal models within the model. This data does not exist in anything other than local and incomplete coverage areas. This is likely to be the case for many years.
- Desirable information on smolt migration routes and lice dispersal models, for example, does not exist and so cannot be included.

Without such data how can MIAP proceed? It is abundantly clear that MIAP is not supported by science nor is there any evidence of a senior scientist supporting the project. Scottish Natural Heritage, for example, does not support such as scientifically flawed project and has not been consulted by RAFTS as MIAP develops. As Jon Gibb, clerk to Lochaber District Salmon Fishery Board, wrote in Scottish Field (March 2013):

> And what a dreadfully flawed piece of 'science' it is.
>
> When Scottish Natural Heritage (SNH) was asked what would be required to identify suitable locations on the west coast for future fish farms they said that the two main elements needed would be information on wild smolt migration routes out from rivers and sea lice dispersal models from fish farms. SNH was right. With this information it might then perhaps be possible to identify places where the placing of a fish farm might present the least risk to the environment.
>
> But the problem was that this research would have taken at least five years to assemble and Alex Salmond's expansion plans couldn't wait that long. So RAFTS came up with an alternative locational model, even though their own Aquaculture Policy Paper (written before they became embroiled in this) stated that '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'.

Moreover, whilst the change of emphasis from 25km to 31km is welcomed the scientific evidence collated by Marine Scotland Science from all the west coast trusts points to an impact of up to 149km away from salmon farms. Why does RAFTS not run the model according to the scientific evidence that states sea lice impact on sea trout can be detrimental to the region of 149km?

For more background read my letter dated 27 April 2013

2) Lack of Geographical Coverage:

How can MIAP proceed when neither Lochaber District Salmon Fishery Board nor Lochaber Fisheries Trust support the project? Your letter of 14 May 2013 attempts to justify the lack of support in Lochaber via the following flawed logic:

Five fisheries trusts (Outer Hebrides, Skye, Argyll, Wester Ross and West Sutherland) have provided information to the model with Lochaber Fisheries Trust having removed themselves from the Locational Guidance part of MIAP in January 2013. An alternative approach has been developed for the systems in Lochaber which used publicly available information only to ensure that waters in other trust areas bounding Lochaber are fully represented in the sensitivity analysis. Waters solely in Lochaber are excluded from the model and publicly available maps. Statistical assessments of this approach have been undertaken to confirm that this twin track analysis approach is appropriate and reasonable.

What this means is that the large area of the Sound of Mull (which is shared water with Argyll and Mull as well as Lochaber) has been assessed using publicly available information. The approach has been analysed and found by RAFTS to be robust. If that is the case then why did RAFTS just waste £100,000's of taxpayers' money producing locational analysis that they admit here could have been done for nothing with publicly available information?!

There is clearly an issue in Lochaber:

"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). "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 values 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 inadvertantly, 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 Staniford, 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. "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: "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?"

3) Lack of Sea Lice Data (But Ample Evidence of a Huge Problem):

Sea lice data from specific salmon farms is shamefully still not available despite repeated demands to make the information public available. Claudia Beamish, a Labour MSP who sits on the rural affairs committee told The Sunday Times (5 May 2013): "I feel quite strongly that, with plans to expand the industry significantly by 2020, the public deserves to know the effects of sea lice on wild salmon."

Alex Fergusson, the Conservative MSP for Galloway and West Dumfries, added in The Sunday Times (5 May 2013): "The concern is that unless there is transparency it's very hard to know the scale of the problem. The question it raises is: what does the industry have to hide? There has to be access to sea lice data by the scientific community on a pretty detailed basis."

It is common knowledge that sea lice infestation of salmon farms in Wester Ross is unacceptably high. Last month the WRASFB wrote to Marine Scotland following reports of high sea lice counts on salmon farm sites operated by Wester Ross Salmon and Marine Scotland was scheduled to visit Wester Ross Salmon farms as part of their routine inspections (this data is now subject to a FOI request and will be passed onto the WRASFB in due course).

In fact, a report published earlier this month by the Salmon & Trout Association revealed 67 breaches of sea lice levels at salmon farms across the West coast of Scotland including at many Wester Ross sites. Here are some of the salmon farm sites within 149km of Wester Ross rivers breaching sea lice levels in 2011 and 2012 – including all Wester Ross Fisheries sites:

Annex A

The following farms were noted during Fish Health Inspectorate inspections in 2011 and 2012 as having breached Code of Good practice thresholds of sea-lice during the period for which records were inspected:

2. Ardessie B, Wester Ross Fisheries Limited
3. Ardessie A, Wester Ross Fisheries Limited
4. Oldany, Loch Duart Limited
5. Loch Laxford, Loch Duart Limited

14. Corry, Wester Ross Fisheries Limited
15. Ardessie A, Wester Ross Fisheries Limited
27. Tanera, Scottish Sea Farms Limited
29. Torridon, Marine Harvest (Scotland) Limited
45. Badcall Bay, Loch Duart Limited
46. Calva Bay, Loch Duart Limited
56. Ardmair, Wester Ross Fisheries Limited
57. Loch Duich, Marine Harvest (Scotland) Limited
58. Loch Alsh, Marine Harvest (Scotland) Limited

Previous inspections in 2009 and 2011 also showed breaches of sea lice limits at Ardmair, Corry and Ardessie in Wester Ross. Read the report in full online here and read all the FOI data obtained by the Salmon & Trout Association via "Sea-lice parasite numbers above industry's own 'threshold' level at over 30% of Scottish salmon farms inspected in second half of 2011".

Marine Harvest's 2012 Annual Report (published on 26 April 2013) reveals that Marine Harvest Scotland is breaching the sea lice trigger levels at 15.1% of their sites (i.e. one in seven) – up from 9.8% in 2010 and 11.7% in 2011.

AVERAGE MONTHLY % OF SITES ABOVE
NATIONAL TRIGGER LEVELS PER BU PER YEAR

BU/YEAR	2010	2011	2012
Norway	15.2	7.5	8.3
Scotland	9.8	11.7	15.1
Ireland	6.2	13	19.9
Faroes	6.2	15.8	7.6
Canada	5.5	1.5	5.5
Chile	4.8	14.1	23.7
MHG average	8.2	11.9	12.2

Marine Harvest also reports that the use of chemicals to control sea lice is increasing to alarming levels (indicating problems with chemical resistance and so-called 'super-lice'):

ACTIVE SUBSTANCE GRAMS PER TONNE
BIOMASS PRODUCED 2008 - 2012 LICE TREATMENT

	ORAL (g/T)	TOPICAL (g/T)	PEROXIDE (LTR/T)
2008	0.83	0.26	0.91
2009	4.09	1.42	0.76
2010	1.10	2.06	5.13
2011	3.52	2.01	2.83
2012	0.75	4.79	10.85

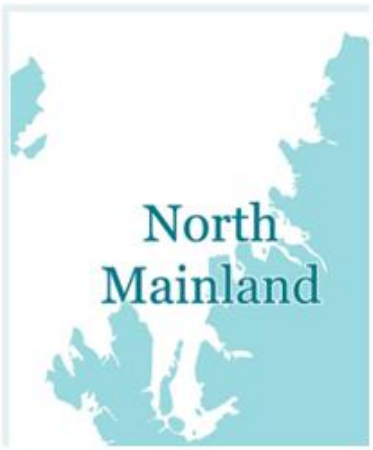
The latest regional sea lice data published by the Scottish Salmon Producers' Organisation details significant breaches of lice thresholds across Scotland – including a 263% breach in North Mainland region which includes 41 active salmon farms (including all Wester Ross sites).

North Mainland

September to December 2012

The North Mainland region encompasses the coastline (and associated islands) from Loch Eriboll in the north to Rubh' Arisaig, near Loch nan Ceall on the west coast.

The region accounts for approximately 18% of all Scottish farmed salmon production[1] and contains 41 active farming sites[2]. During the present reporting period 36 of these active sites were stocked with fish, with the remaining sites being left fallow as part of an established and pre-determined production plan.



Sea Lice & Area Management

The SSPO manage a dedicated system that has been specifically designed to assist the industry, through the generation and exchange of information on fish health management across Scotland. Information gathered through the application of the system indicates that, during the present reporting period lice numbers across the North Mainland region were, on average, 263% above the suggested lice treatment threshold set out in the NTS and CoGP (*i.e.* 1.0 adult female lice per fish). Similar to all areas of Scotland, various lice management practices are adopted throughout the North Mainland region, some examples of which are given below:

During 2011, high sea lice levels were reported at salmon farms across Scotland: with North Mainland region breaching the thresholds by 149% in July 2011. During 2012, sea lice levels on Scottish salmon farms continued to be a problem. RAFTS reported in January 2013:

> The SSPO reports indicate that in the period of May 2012 the Western Isles had lice numbers across these the region, on average, remained below the suggested lice treatment threshold set out in the National Treatment Strategy for the Control of Sea Lice on Scottish Salmon Farms (NTS) and the Code of Good Practice (CoGP). However, the North Mainland and South Mainland, lice numbers across this region were, on average, 152% and 70% respectively above the suggested treatment threshold set out in the NTS and CoGP (Figure 21A). In June 2012 the SSPO reports indicate that again the Western Isles, lice numbers across this region, on average, remained below the suggested lice treatment threshold set out in the NTS and CoGP. Whilst in the North Mainland and South Mainland regions the lice numbers across this region, on average, which were 458% and 22% respectively above the suggested lice treatment threshold set out in the NTS and CoGP (Figure 21B). Finally in July 2012 the SSPO reports indicated that the Western Isles and the South Mainland, lice numbers across these two regions, on average, remained below the suggested lice treatment threshold set out in the NTS and CoGP. Whilst the North Mainland during July, lice numbers were, on average, 233% above the suggested lice treatment threshold set out in the NTS and CoGP (Figure 21C).

Sea lice data obtained in February 2013 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 Shieldaig in Wester Ross in 2012 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).

Another 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. Infestation levels of up to 130 sea lice per sea trout were recorded at Camas na Gaul; up to 126 sea lice per sea trout at Laxford and up to 120 sea lice per sea trout at Kanaird. Sea lice infestation was reported over 40 km away from the nearest salmon farm:

Suffice to say that it is impossible to support MIAP without access to site-specific sea lice data from ALL salmon farms in Wester Ross as well as all farms within the 149km zone of impact. Until the Scottish salmon farming industry make sea lice data available, MIAP can only be seen as a project missing the vital ingredient and therefore cannot be taken seriously in any shape or form.

In the absence of sea lice data, other indicators of fish health are relevant. For example, the growing numbers of dead farmed salmon and chemically-contaminated dead zones under salmon farms are indicative of a significant problem in Scottish salmon farming.

The sea lice problem is clearly out of control as is the overuse of chemicals due to sea lice resistance and now resulting in "super lice". Data published earlier this month by SEPA also indicate a significant problem with chemicals contaminating sediments and shellfish in the vicinity of salmon farms. The Guardian newspaper reported (10 May) that Marine Harvest breached chemicals limits by over 450 times in Loch Shell.

"Are we sure that these residues are having no effect on local populations of other crustaceans, such as prawns and lobsters, upon which many inshore fishermen rely for their livelihoods?" reported The Sunday Herald in 2011 (read more details via "Revealed: the toxic pesticides that pollute our lochs").

Further information obtained from SEPA by the Salmon & Trout Association in 2012 via Freedom of Information revealed:

• The failure of fish-farmers to report to SEPA self-monitored data concerning sea-lice chemical residues in the sea-bed of Scottish sea lochs: SEPA recorded approximately 16% of fish-farms as failing to supply Slice residue data between 2005 and 2010 in accordance with regulations

• Sea-lice chemical residues in excess of Environmental Quality Standards: Approximately 13% of fish-farms reported self-monitored samples to SEPA of sea-bed residues in excess of EQS between 2005 and 2010

Read more via "Salmon & Trout Association exposes sea-bed pollution of Scottish sea-lochs"

SEPA inspections of salmon farms in Wester Ross reveal significant breaches of pollution limits. "Evidence released by SEPA also shows that pollution of the seabed underneath the three sites – Corry, Ardmair and Ardessie – has been rated as "unsatisfactory" 20 times over the last ten years, and "borderline" eight times," reported The Sunday Herald in 2011.

Documents on chemical contamination of sediments were also obtained from SEPA this week including damning data on Wester Ross Salmon. For example, the Ardessie salmon farm in Little Loch Broom was deemed "Unsatisfactory" with SEPA noting that: "It is of concern that the area of enrichment has developed after only six months of use."

SEPA

MARINE FISH FARM MONITORING REPORT

REPORT FROM:	MARINE SCIENCE DINGWALL
REPORT TO:	OPERATIONS STAFF

SITE DETAILS

COMPANY:	Wester Ross Fisheries Ltd
LOCATION:	Ardessie A
RECEIVING WATER	Little Loch Broom
CAGE GROUP:	
CONSENT NUMBER:	CAR/L/1003012
NGR:	NH 0466 9021
TEAM:	North Highland
SITE ID:	LIT1

SURVEY DETAILS

MONITORING METHOD:	Benthic		
SURVEY TYPE:	Self Monitoring		
SURVEY DATE:	16/09/2011		
DATE RECEIVED:	31/12/2011		
REPORT DATE:	06/02/2012		
EVALUATED BY:	MW/AP	BIOMASS:	90 (t)
SUBMISSION NO:	N 3466	MAX BIOMASS	262 (t)

CLASSIFICATION: Unsatisfactory

Read the SEPA report in full online here

Another Wester Ross Salmon site at Corry in Loch Broom was also classified as "Unsatisfactory" – with SEPA reporting that the site was "degraded" with "poor species richness":

MARINE FISH FARM MONITORING REPORT

SITE ID BRO1 SUBMISSION NO: N 3364

SUMMARY

Evaluated against quality criteria stated in SEPA's Fish Farm Manual Annex F according to NWM/MAR/010

The sediment at the cage edge was described as Black smelly mud with shell. No waste or fungus was noted.
The sediment at the AZE & Ref stations consisted of brown mud with shell & stones.

Biology:
There was an obvious enrichment effect at the cage edge & 51m (AZE-10) stations, which showed little similarity to the other AZE & Ref stations. These stations had poor species richness & were dominated by the enrichment polychaetes, Capitella & Malacoceros. The resulting ITI scores indicated degraded communities. The cage edge station meets SEPA's criteria within the AZE, but the 51m station fails all of SEPA's criteria outwith the AZE.

The 61m (AZE) & 71m (AZE+10m) stations had quite good species richness & diversity values. However, these too were dominated by Capitella (along with Lumbrineris), & while their ITI scores were higher than at the 51m station, they still indicated degraded communities. These stations met 2 & failed 2 of SEPA's criteria outwith the AZE.

Due to the presence of enrichment at the AZE stations, this survey is classed as unsatisfactory based on the faunal data.

Read the SEPA report in full online here. Further FOI documents on salmon farms in the Wester Ross area will be made available over the coming months.

Have RAFTS consulted with fisherman over the Scottish Government's plans to increase salmon farming production by 50% by 2020? Have creel fishermen in Wester Ross and in the Minch been consulted?

4) Lack of Back-Bone:

The RAFTS report "Managing Interactions Aquaculture Project: Briefing Paper for Wester Ross DSFB" (April 2013) concludes by admitting that the wild fish sector has "failed to prevent aquaculture developments". However, the conclusion that "it is not possible to have the industry removed from large areas of the west coast" (p9) is seriously flawed:

- The fact that significant and disproportionately high %s of current aquaculture activities take place in areas identified by the model confirm that, to date, we as a sector have failed to prevent aquaculture developments taking place in important locations. The Locational Guidance may provide a basis both to protect these areas from further future development within the planning process and may provide a basis to begin dialogue on the potential for relocation of production from particularly sensitive locations if political and industry support for this is generated.
- Given the economic value of the aquaculture industry and the significant Government support for its continuation and expansion in Scotland it is not possible to have the industry removed from large areas of the west coast simply by wishing that to be the case.
- In the longer term the removal of aquaculture production offshore and/or to closed containment is the stated policy objective of RAFTS and ASFB to better protect wild fish stocks from the impacts of sea lice and aquaculture escapes in particular. In the meantime, the Locational Guidance model may provide a mechanism to achieve some traction within the planning system to prevent development in particularly sensitive locations.

As a river owner who has seen the impact of salmon farming on wild salmon and sea trout and has filed a complaint to the European Commission (read online here), I urge all river owners to fight until the bitter end to remove ALL salmon farms from the West coast of Scotland.

I expect nothing less from RAFTS – a charitable body whose one of two charitable purposes states: "the advancement of environmental protection or improvement". In addition RAFTS stated object is the "conservation and enhancement of native freshwater fish and their environments in Scotland" (read more on my complaint against RAFTS filed with the Office of the Scottish Charity Regulator via "Wild fish groups under investigation by charity watchdog").

It is a travesty that RAFTS – aided and abetted by their 'partners' in MIAP – have chosen to sacrifice West coast rivers at the altar of what they wrongly perceive as the inevitable expansion of salmon farming. Wester Ross must NOT be sacrificed to fuel the SNP's twisted vision of using predominately Norwegian-owned salmon farms to export cheap farmed salmon to China.

MIAP appears to be the conception of one man. There is some support from trusts which in many cases are heavily influenced by the salmon farming industry and also the odd board who are prepared to risk the west coast on a project without a scientist (Donna-Claire Hunter has left RAFTS), with no backing of senior scientists nor SNH. On top of that the e-mail below states that the Atlantic Salmon Trust – the most prestigious scientific organisation in the country – "didn't think it would work" and "didn't want to be associated with it when it failed":

----- Original Message -----
From: tony
To: Rhidorroch Estate
Sent: Monday, May 21, 2012 10:39 PM
Subject: RE: RAFTS MIP

Hi Jenny

Further to my summary of where AST is going I should have added that AST withdrew from the 'Managing Interactions' process because we didn't think it would work and we didn't want to be associated with it when it failed.

Best wishes

Tony

Tony Andrews
Chief Executive Atlantic Salmon Trust
Mobile: 07748 634 658
Website: WWW.Atlanticsalmontrust.org

RAFTS state that MIAP is a much needed tool for the planners. Perhaps RAFTS have forgotten that from 1999 to 2011 we had the Tripartite Working Group – this tool for the planners was vastly ignored by Scottish Government and surprisingly the RAFTS/ASFB regime. Again in 2006 the Highland Council published their much consulted "Coastal Plan for the Two Brooms Area" to deal with the huge fish farming concerns in the area. This EU, Crown Estate and SNH supported plan was not supported by the Scottish Government or RAFTS/ASFB when fish farm applications came in and objections were required. Hence the reason for the high proportion of salmon farms, expansions and lease renewals in sensitive areas that RAFTS outlines in the report.

This was all prior to the policy of Scottish Ministers to increase salmon farming by 50% by 2020. The Scottish Government did not pay RAFTS £400,000 to be told in-shore is more sensitive than off- shore. No they paid the money because they want a quick way of locating salmon farms in suitable places (for themselves). They needed to use RAFTS, trusts and boards by supporting their funding and in turn gaining agreement to increase salmon farming and thereby opening the door to west coast waters via the wild fish fraternity. This MIAP map is meaningless – has no legal or planning stance but to RAFTS and Scottish Government it will give them the means to reach their increase of production by 50% and likely more in whatever locations are feasible and cost effective for the salmon farmers.

The *modus operandi* of MIAP appears to have been solely to obtain money to keep RAFTS in line with the Scottish Government's policy of expanding salmon farming. It is a trick and tricks we have seen before, for this is big business. Funding for RAFTS is the gateway to Alex Salmond's ambition of increasing salmon farming by 50% by 2020 to feed the Chinese market with the largely Norwegian salmon farming industry all to the detriment of west coast waters and wild fish.

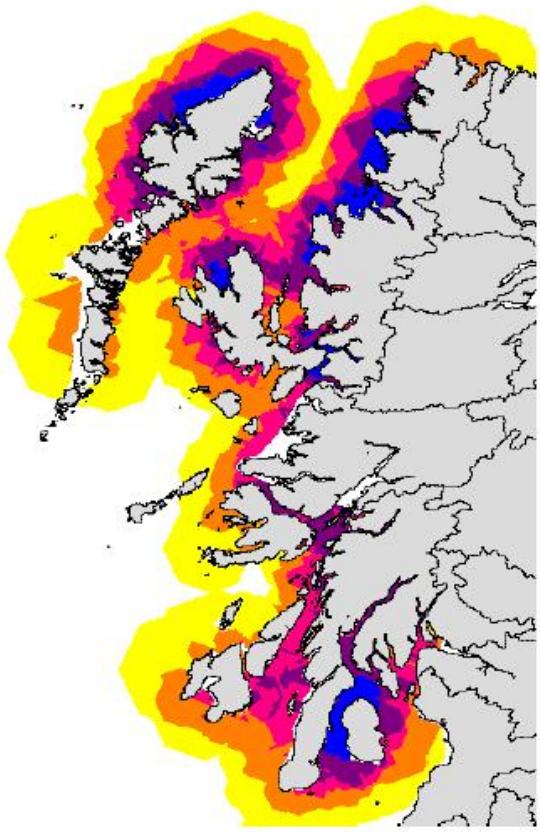
The SNP want the increase of production to help pave the way to Independence by trying to increase a polluting industry driven by spin – at the expense of "real" local employment, lobster, prawn, crab small boat fishermen, scallop divers, tourism, rod fishing industry and all recreation associated with the requirement for unpolluted west coast waters. This is our choice for our children. Please advise the wild fish

organisations that here on the west coast we do not want MIAP: we want to protect wild salmon and sea trout.

5) Lack of Room for Expansion on the West Coast:

The RAFTS report "Managing Interactions Aquaculture Project: Briefing Paper for Wester Ross DSFB" (April 2013) states very clearly that the West coast of Scotland is already overflowing with salmon farms (hence the sea lice problem). In particular, Wester Ross is currently identified as an area of "high sensitivity" (blue and purple on the map below, p4):

Map 1: v1 Output of River and Fisheries Locational Guidance

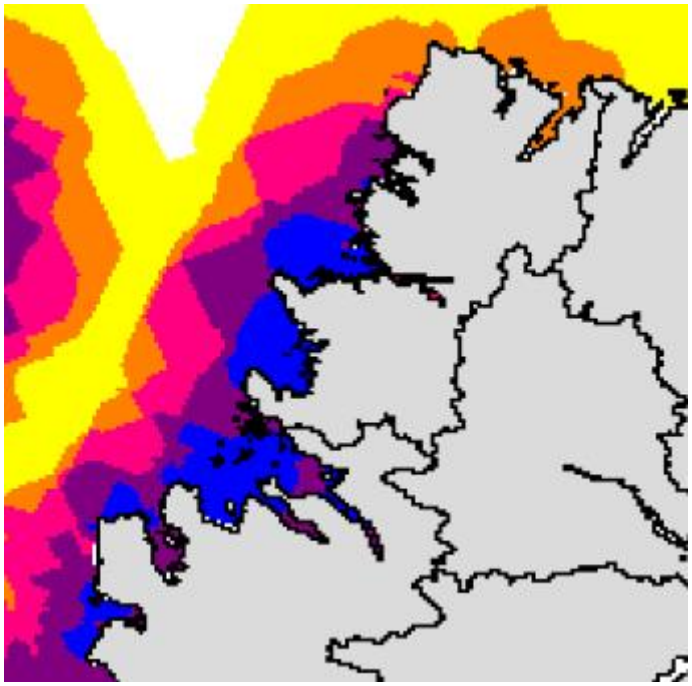


The report also states (p4) that "there is no ranking of individual rivers available or generated":

3.1.1 Outputs:

The v1 output of the model has been prepared (see **Map 1**). This has been provided to participating trusts in GIS map layer format and the map presented is simply an image of this entire layer. The model generates a 5 class sensitivity assessment of coastal waters which is a function of the combined river scores of all rivers and their intersections with each other at 1km, 5km, 15km and 31km distances from each river mouth. There is no ranking of individual rivers available or generated and scores from all rivers are combined into an overall sensitivity of the receiving coastal waters.

Surely this information should be available? A closer look at Map 1 (p4) for rivers in Wester Ross reveals that majority of the coastline is judged to be highly sensitive but it is impossible to pick out specific rivers. By magnifying the map it is possible to see that not all the coastal waters are in the class 5 sensitive blue as of first glance but some highly sensitive areas to river owners in Wester Ross are coloured purple. We are told river scores are added together to make up this formula but we are not privy to how these scores are made up. We are also not told what blue and purple mean.



Please therefore make this information available to all river owners. We have been categorised before!

On the Uists there are also less sensitive areas and "safe" zones marked on the map. Does RAFTS have the right to condemn those areas and others with a death warrant? How many other rivers are going to be deemed expendable as this map changes as we are told it will as time goes on?

RAFTS have admitted they have no sea lice modelling nor smolt tracking information which SNH stated was required for such an experiment. Therefore, there is no information where the smolts travel from the west coast rivers to their feeding grounds. Do WRASFB and river owners want to take responsibility for condoning such a high risk experiment?

The report states (p5) that there is a "disproportionately high level" of salmon farms in the most sensitive areas (57% to be precise):

However, when the analysis is considered in relation to the location of fish farm sites (**Table 2**) it is clear that a disproportionately high level of current aquaculture developments operate in the areas identified as most sensitive from the model analysis. A total of 57% of all aquaculture operates in the 19% of most sensitive waters identified.

Table 2: Showing distribution of aquaculture sites in sensitivity score categories

Colour Code	Sensitivity Score	Area km^2	Area %	Active Farm (Ex. Lochaber)	% Active Farm (Ex. Lochaber)
Yellow	1	11479	39	5	4
Orange	2	7585	26	24	18
Pink	3	4625	16	28	21
Purple	4	4009	14	53	39
Blue	5	1569	5	24	18

The report continues (p7-8):

Similar to the rivers and fisheries model, when the analysis is considered in relation to the location of fish farm sites (**Table 3**) it is clear that a disproportionately high level of current aquaculture developments operate in the areas identified as most sensitive from the model analysis. A total of 24% of all aquaculture operates in the 4% of most sensitive waters identified. However, a disproportionately small % of aquaculture activities (22%) are found in the 84% of waters identified as least sensitive. Some 54% of aquaculture operates in the middle sensitivity analysis banding which represents only 12% of the area included in the model.

Table 3: Showing summary of sensitivity areas and % and distribution of aquaculture sites in sensitivity score categories

Colour Code	Sensitivity Score	Area km^2	Area %	Active Farm (Ex. Lochaber)	% Active Farm (Ex. Lochaber)
Yellow	1	172	1	1	1
Orange	2	10664	83	28	21
Pink	3	1584	12	72	54
Purple	4	395	3	26	19
Blue	5	40	1	7	5

The report also fails to explain why it is automatically assumed that the West coast of Scotland is open for business at all costs. Why are the Shetland and Orkney Islands not included? Why are the North & East coasts not included?

The double-standard inherent in MIAP makes the entire project fundamentally flawed. As my letter to RAFTS in February 2013 stated:

"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"

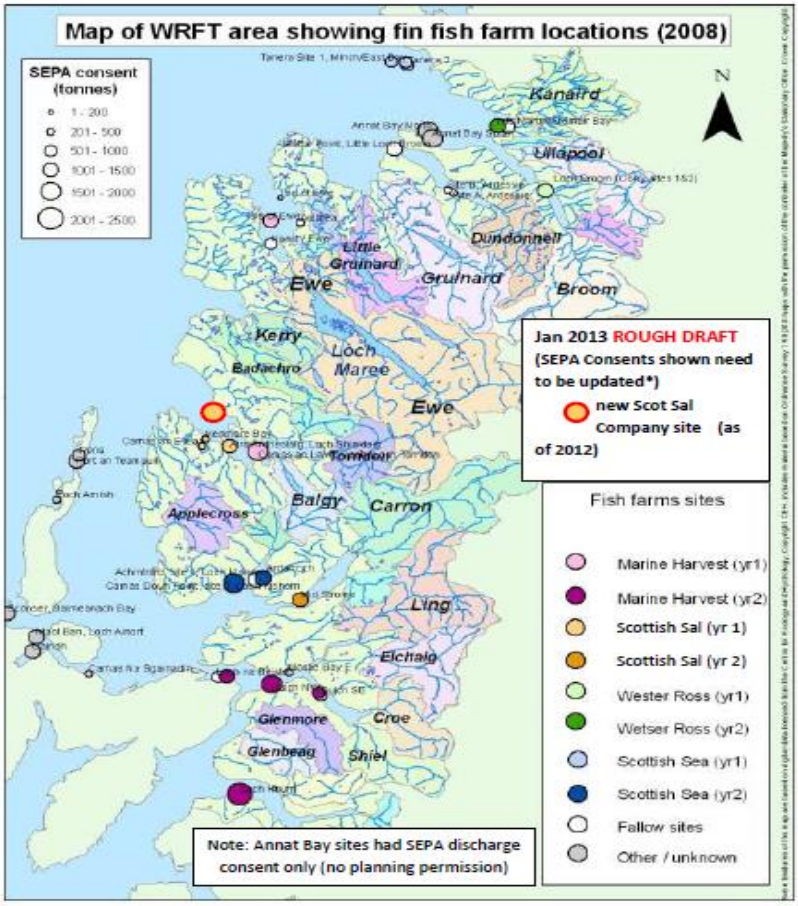
As my letter to WRASFB dated 27 April stated:

"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. Rather than supporting MIAP (whose partners including RAFTS and ASFB "recognises the permanence and economic importance of the aquaculture industry to Scotland and the West Coast of Scotland in particular"), WRASFB should adopt a zero tolerance approach to open net cage salmon farming in Wester Ross.

Faced with increasing sea lice burdens on wild fish stocks, chemical increases degrading west coast waters and Norwegian-origin farmed salmon eroding the genetic diversity of wild salmon, surely the WRASFB should be opposing ALL new salmon farms and campaigning for the removal of ALL existing salmon farms?"

Moreover, as my letter added:

"Wild fish in Wester Ross are already strangled by a hangman's noose of salmon farms!"



"Rather than supporting MIAP the WRASFB should surely be conducting further research on sea lice infestation rates near salmon farms, chemical resistance as well as demanding the immediate closure of salmon farms within 31km of rivers. The scientific evidence and current state of sea lice infestation on salmon farms in Wester Ross demands it."

Read more details via my letter to WRASFB online here

6) Lack of Public Debate:

The RAFTS report "Managing Interactions Aquaculture Project: Briefing Paper for Wester Ross DSFB" (April 2013) states (p2-3):

> This paper is a non-technical briefing provided to inform the discussions of the Wester Ross DSFB only. It is not expected that the contents of this paper are to appear in the press and mis-represented as part of attacks against RAFTS or the MIAP itself.
>
> The Locational Guidance work within MIAP has been the subject of much debate and publicity. Much of this has been negative and fuelled by the distribution of, often deliberately, mis-representative comment and mis-interpretative assessments of the work. However, the work has been supported by many to this stage and, now that v1 model outputs are available, a genuine consideration of the work can begin.

Since MIAP is a publicly-funded project to the tune of an estimated £400,000 thus far, surely the public have a right to know what is going on and a right to comment? It has not been possible to get questions answered or to receive any technical information from RAFTS/ASFB for this project.

In simple terms, MIAP raises far too many questions than provides answers. The whole project lacks scientific rigour and smacks as yet another tool to advance an increase in sea-lice infested salmon farming on the West coast of Scotland. For those reasons alone, MIAP must be attacked and WRASFB must join Lochaber District Salmon Fishery Board and Lochaber Fishery Trust in opposition.

For more background details on why MIAP must not be supported, please also read my letter dated 27 April 2013 and my letter to RAFTS dated 9 February 2013.

In the spirit of public transparency, for what after all is a £400,000 project taken out of the taxpayers' precious purse, I have copied this letter to various Government agencies, wild fish interests and various media.

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
Scottish Fishermen's Federation
Scottish Creel Fishermen's Federation