

PE1782/B

Petitioner submission of 23 June 2020

We are writing in response to Marine Scotland's letter regarding the above petition.

It is welcome that Marine Scotland acknowledges that the process by which it revised its policy on the stocking of salmon rivers 'raised concerns amongst many people in the angling community, and some of those who own and manage salmon fisheries'.

As you will appreciate, this is a significant cohort of people for whom this issue is very important. As we are aware, from other areas of conservation, it is mostly those with an active interest in the species that are most aware of the need to conserve it (and harvest it sustainably) and we would suggest the angling community and owners/ managers of fisheries would count themselves amongst those most interested in this topic.

In our view, this strengthens the initial request, as set out in this petition, for a full stakeholder consultation as soon as it is safe to do so, so all relevant interests can input.

We note, in Marine Scotland's response, that they intend to gather together the latest research and evidence, first, before committing to a 'short, focused' consultation.

In our view, this approach runs the risk of the consultation being perceived as a fait accompli rather than a genuine attempt to make good, consultative, policy. Instead, we believe there is no harm in Marine Scotland producing evidence as part of a full consultative process, examining all the issues, rather than presenting it first and then consulting only on what it intends.

The issue of river stocking is, as we have acknowledged, a contentious issue. However, if the same problem with the 2019 policy revision is not to be repeated again- and for people (major stakeholders) to have faith in the process- we believe a date should be formalised for a consultation, when the Covid 19 pandemic allows, so that stakeholders can buy into the process and, equally importantly, know where they stand for later this year.

We also have some concern that the science which currently influences Marine Scotland policy is not Scottish science but largely from overseas and this native knowledge gap ought to be part of a wider consultation rather than being the issue around which the consultation is managed.

There are many issues to balance. There is also published information from very few Scottish studies, if any, to suggest that appropriately managed stocking practice causes actual harm.

Anglers and wild fishery owners will have a role to play in how Scotland approaches this issue in future. There are examples of good and bad stocking practice and there is a need to keep the knowledge we have, within this sector, and an opportunity to refine what we know so that it is fit for purpose and intelligent. Hatcheries also have a vital role to play in science and education.

For example, the return of wild stocks to the river Garry could not have happened without an active hatchery with a sufficient capacity.

Whatever Marine Scotland does on the issue of stocking is going to have an impact on whether we still have viable hatcheries in future to be able to undertake restorative or mitigation stocking in rivers, where fish populations have crashed. We need to get this right now. Norway, for example, retains hatchery capacity to hold stocks from rivers for mitigation stocking where there have been outbreaks of Gyrodactylus to gene back native stocks for restoring stocks in affected rivers. Scotland needs a similar gene bank capacity should stocks be threatened in this or other ways.

Beyond this, we also know from experience that hatcheries offer an important draw for conservation funds on our river systems because fishery owners and their customers (anglers) are more inclined to invest if a river is shown to be proactive in safeguarding against decline rather than being passive. Such facilities provide unique opportunities as regards public education and support for research.

Whilst this, alone, is not an argument to roll out stocking per se, customer perception and funding *are* highly important for a sector which sustains a considerable number of vital jobs in dispersed rural communities, often with few other employment opportunities. This is where socio economic factors must be fully considered and balanced with wider conservation concerns.

After a Covid-19 interrupted season, fisheries and boards are facing the very real prospect of a drop in levies. Hatchery policy is going to be an increasingly important factor in financial decision making and we feel it is necessary for a full consultation, with all stakeholders and interests, to be taken forward as soon as is practicable.

Bob White, petitioner, on behalf of The SGA Fishing Group.