

MINUTES OF ANNUAL PROPRIETORS & WRASFB BOARD MEETING

By Conference Call	PRESENT:	
DATE: 17 November 2022	Stephen Bate (SB)	Gordon Crawford (GC)
OPENED AT: 14.30 CLOSED AT: 16.25	Rosie Nicoll (RN)	Donald Rice (DR)
IN ATTENDANCE:	Andrew D Barclay (ADB)	Stuart Allison (SA)
Peter Jarosz (PJ) Peter Cunningham (PC)	APOLOGIES: Neil Wright (NW)	

1. Apologies

PJ reported that Neil Wright had this morning tendered his resignation as a board member.

2. Approval of the minutes of the 6th May 2022 Meeting

The minutes had been previously approved by email - they were proposed by NW and seconded by DR.

3. Matters Arising

There were no matters arising that hadn't previously been dealt with by email.

4. The WRASFB Accounts 2021-22 and Financial Report Year to Date

PJ had previously circulated by email a Financial Report (year to date), half-year budget and an expenses analysis of expenses year to date. Outstanding levies will be dealt with before Christmas.

5. Update on Aquaculture Events Since Last Meeting

SB stated that MH finally did come back to us and the other parties with his position on the Torridon EMPs and it was not favourable to the Board. His position was that he was minded to accept the two draft EMPs (with certain reservations) put forward by the two aquaculture companies rather than accept the EMP put forward by the Board. The Board's response to MH (and copied to the HC legal department) was to point out that the two draft EMPs were too vague in their dealing with sea lice targets being exceeded and therefore did not satisfy the condition 1 of both planning approvals. Our response also suggested that the way forward would be for HC organise a meeting with MSS (as the other statutory consultee) in attendance along with Fisheries Management Scotland (FMS) and Fish Legal. MH did agree that this meeting was the way forward. Meanwhile SB and PJ had a meeting with FMS with the intention of asking FMS to use their regular contact with MSS to encourage MSS to be involved in this EMP process. PJ added that FMS were not currently aware of MSS's views on the EMP requirements for Loch Torridon and it was suggested that we attempt a pre-meeting with MSS to hear their views prior to any meeting with HC in attendance. FMS thought that any pre-meeting was unlikely and that we would have to wait for the meeting with HC in attendance before MSS would also attend.

In addition to the Torridon application, in the north of our area a S42 planning application has been made by WRF Ltd to remove the ten-year condition under which their Ardmair site currently operates. The Board has submitted a robust objection to this application stating that we would like to see either a refusal or the granting of another ten-year term condition. A new coastal planning officer (Jethro Watson) at the HC planning department is handling this application. The Board need to take the same line as we have in Loch

Torrison and insist that should permanent planning consent be granted then it must have a robust EMP extremely similar to those put forward for Loch Torrison. In the past few days, Peter C has been approached by the biologist at WRF Ltd asking for his co-operation for WRF to produce their EMP for submission to HC as a further document of this application. One response to the application by Tom Appleby made a very interesting legal point involving the Little Gruinard River. We should seek Fish Legal's view on the issue raised in this response and then, if the view is supported by Fish Legal, put in a further submission. DR thought that the point raised in the Appleby submission did make logical sense and that it is an argument that the Board had previously not employed in their submissions but could be very useful for us.

Action Point: send to RY for his opinion on it.

One other "possible" application is the Horse Island fish farm that has been submitted for screening and scoping. PJ had a telephone call from Keith Dunbar (KD lives just north of Ullapool and has been a wild fish champion for over 40 years) concerning this potential application and he has got two pictures (one from the screening and scoping submission of what the fish farm would look like and the other of the area as it currently is with no fish farm there) and he wants to know who is able to montage (superimpose one picture onto another to create a single picture) these two to show what the fish farm would be like once in situ. He intends to object to it strongly from a visual impact point of view. PJ believes that Alex Gray (Wordworks Ltd) is more than capable of doing this so PJ will steer Keith towards Alex and let them talk to each other.

PJ suggested that the Board (approached but, as yet, received no definitive answer) should seek Mowi's latest intentions for the "proposed" brood-stock fish farm in Loch Ewe especially since their acquisition of 75% of WRF Ltd now offers an alternative option. It appears that Mowi have submitted a planning application for the construction of a hatchery facility at Ardessie and it would be more logical for their brood-stock fish farm to be closer to hand - maybe in Little Loch Broom or at Ardmair (hence the S42).

PC said that currently fish farmers are experiencing high mortality rates in their fish farms - mainly due to Gill Disease (GD). The knock-on effect of this is that whilst this problem is affecting their fish the companies do not like to treat for sea lice as that process further stresses out the fish and adds to the mortality rate. In West Sutherland the biologist there has found wild fish (mainly sea trout) affected with GD so PC has asked FMS to look at developing a training seminar for biologists to help them identify the problem in wild fish that they routinely catch.

6. ASC Accreditation Process

SB pointed out that the Aquaculture Stewardship Council accreditation scheme has its own standards that they consider to be adequate for the protection of wild fish. The standard has been recently raised from 0.1 lice per fish to 0.5 lice per fish. So whilst the Board has responded to the Mowi application it has not supported the accreditation scheme itself. In the latest ASC report on the Mowi application ASC have stated that there is no written area agreement between Mowi and Bakkafrøst for Loch Torrison and have emphasised that such an agreement is a requisite condition for membership of the accreditation scheme. The Board will make a further response (this week) to ASC that will also draw their attention to our concerns regarding the wild fish monitoring report for 2022 produced by APEM (the company employed by Mowi and Bakkafrøst for wild fish monitoring). This states in their report on electro-fishing data results that they found no salmon fry in either the Torrison or Balgy rivers. If true (which PC doubts), this is of extreme concern and to verify this, we need to request copies of their raw data.

7. SEPA's New Regulatory Regime

SB pointed out that there is an interim report from SEPA that deals with their proposals in a bullet point way and overall was (perhaps surprisingly) quite wild fish "biased". This

is available on their web site. It would seem that SEPA are intent on producing a regulatory regime that is “fit for purpose” and that will have consequences for the exceedance of the target figures built into the regime. PJ said that Alan Wells (AW) had made us aware that there is concentrated lobbying from aquaculture with SEPA for SEPA to “water down” their proposals. FMS have actively lobbied not just SEPA but relevant ScotGov departments for the retention of robust targets as well as consequent reduction of biomass should targets be exceeded. There are two SEPA workshops scheduled for early December and we may attend these to listen to the proposed regime details as well as to SEPA’s timescale for its further development, its ultimate “roll out” as well as their view on the introgression of the existing fish farms into this new regime.

One further point on this issue, following an email request from SEPA for the WRASFB to submit a response to their proposed regulatory regime the Board submitted a detailed response that was emailed to the correct SEPA email address as they indicated. When our response did not appear on their web site (along with others) PJ contacted SEPA again to be informed that our response had, in fact, been dumped in their email trash by their firewall security. They did, however, assure us that it would be retrieved, read and acknowledged – PJ then received an email acknowledgement.

8. WRFT Biologist’s Report

PC had previously circulated a report and then shared his screen to show a visual presentation of this year’s fieldwork.

The first item covered was electro-fishing data from each of the rivers that were electro-fished. PC gave a précis of what was found in each of the rivers that were electro-fished. In general the rivers in the MPA appear to be healthier than those in the south of the Board’s area.

PC gave an overview of the fish caught in the Adult Salmon Monitoring project. Sea trout sampling (seine netting) yielded good results on the Kannaird with some 50 sea trout at the end of August. Among these fish were 3 escaped fish farm salmon though there were no reported escapes from any fish farms in the area.

This year there was a coastal fyke net deployed in Loch Ewe. For a number of reasons (including obtaining a license from MS) the net was late going in but it did catch some sea trout and lots of little gadoids covered in black spots on their tails.

The seine netting in Flowerdale bay caught another 50 sea trout with 8 over 2lbs and 1 over 4lbs. This site experiences higher levels of sea lice when the Torridon fish farms are in their second year of production and this phenomenon has occurred over many years.

PC also reported data analysis that he has done which shows a correlation between catch statistics and fish farm production cycles - sea lice increases in the second year of production badly affect the numbers of returning salmon to our rivers. This has been recognized in Norway by the Norwegian government but so far has not received that recognition in Scotland.

9. Anglers’ Representative’s Report

DB stated that he would “link up” with PC and for future meetings supplement PC’s report with reports from an angling representatives’ aspect.

10. AOCB

PJ thanked GC for his consent/agreement and SA for his co-operation for allowing the Gruinard River to be the river for this year's Adult Salmon Monitoring project. Equally thanks go to JM for her consent and GR for his co-operation on the Gruinard River.

PJ also thanked DR for his consent and AM for his co-operation for allowing the Dundonnell River to be used for this project. Both rivers revealed some very interesting data and the project was an important source of funding for part of PC's field-work this year.

An email from AW (FMS) received only this morning pointed out that saying "No" to a revaluation of fishings (by the District Valuation Office) has a serious implication of dropping the Board's area fishings from the 2023 Valuation Roll and could make the raising of future levies illegal. PJ has been in touch with Robert Shepherd who is the valuation officer for Wester Ross but he had to consult his superior before he could confirm that AW's point was correct.

There was some discussion regarding what was the basis for this revaluation given that for 2 years of the time since the last revaluation COVID had effectively meant that no fishing had taken place - so simply confirm the existing valuations. PJ will check out with the local valuation office, with FMS and with Fish Legal exactly what the implications of continuing to say "No" to a revaluation actually means.

PJ gave a reminder to those present that catch returns to the Board are important and he thanked SB for his returns already made.

11. Date of Next Meeting

The date of our next meeting will be arranged by DoodlePoll.

These minutes were proposed by Rosie Nicoll and seconded by Donald Rice

Signed  Stephen Bate
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Date 4/17/2023