

CONSULTATION QUESTIONS

Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?

If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.

Yes No

The Scottish Salmon Producers' Organisation does not agree with the inclusion of either migratory brown trout (sea trout) (*Salmo trutta*) or grey seal (*Halichoerus grypus*) as species in the list of Priority Marine Features.

Brown trout (*Salmo trutta*)

The brown trout (*Salmo trutta*) is a ubiquitous species in Scotland's rivers, streams and freshwater lochs. It is so numerous that it has never been considered necessary to establish national population statistics on the stocks and, although the fish is widely exploited by angling, there are no systematic or national catch statistics. Sea trout is the name applied to members of the brown trout population which opt for an anadromous life strategy, usually as a result of the ecological conditions and poor food availability in their freshwater habitat. Sea trout are not genetically distinct from brown trout and do not represent a distinct species or type.

Priority Marine Features (PMFs) are habitats and species which SNH has considered to be marine nature conservation priorities in Scottish waters. However, selection in that list implies that: (a) there is a need for marine conservation and; (b) there are marine conservation measures that could or should be adopted. In the case of migratory brown trout neither (a) nor (b) has been demonstrated. Indeed, the case can be made that the most effective way to influence the marine population of *Salmo trutta* would be to manipulate the freshwater environment.

Grey Seals (*Halichoerus grypus*)

Whilst the population of Grey Seals based in Scotland may be of international significance, the huge population increase of the species over the past three decades has already been identified as a potential threat to other species which are at much greater population risk. Grey seals are dominant marine predators with a population which is not under threat in any significant way. Making the species a PMF provides an unnecessary additional statutory protection to existing statutory measures. This will simply serve to put other species at increased risk, since it will act as an unnecessary impediment to the introduction of management plans, if they are needed in the future.

General

Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes No

Comments