

The Alien and Locally Absent Species in Aquaculture (Scotland) Regulations 2014



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

The Highland Council

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

James

Forename

Bromham

2. Postal Address

Highland Council,

Development and Infrastructure Service

Council Headquarters

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Postcode IV3 5NX

Phone 01463 702510

Email

james.bromham@highland.gov.uk

3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Are you content for your **response** to be made available?

Please tick as appropriate

Yes **No**

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No



Lauren Ferrari
Scottish Government
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Victoria Quay
Leith
Edinburgh
EH6 6QQ

Please ask for: James Bromham
Direct Dial: 01463 702510
E-mail: james.bromham@highland.gov.uk
Your Ref:
OurRef:
Date: 11 November 2014

Dear Lauren,

The Alien and Locally Absent Species in Aquaculture (Scotland) Regulations 2014

Thank you for the opportunity to respond to the above consultation which was advertised on the Scottish Government website and in consultation bulletins as having a closing date of 11th November 2014. We note that the consultation document requests responses by 5th November but trust that as this response has been submitted on the advertised date that it will be accepted as timeous.

Please note that this response is made at officer level on behalf of the Council.

We welcome the suggested regulations which will implement, in Scotland, the provisions of Council Regulation (EC) 708/2007. EC 708/2007 seeks to protect aquatic habitats from the risks associated with the use of alien and locally absent species in aquaculture, whilst contributing to the sustainable development of the aquaculture industry.

We note with interest the provisions that exempt Pacific Oyster (*Crassostrea gigas*) and Rainbow Trout (*Oncorhynchus mykiss*) from the requirement for movements to be registered. The reason why this approach has been adopted for these species is not set out in the consultation, the regulation, or the explanatory note so the background to this exemption is unclear. This presents some cause for concern.

In Highland we are currently seeing significant and renewed interest in the culture of Pacific oysters and are at present considering a number of planning applications for this species. This is, we believe, largely as a result of the continued problems faced by the French industry with high oyster mortalities resulting from oyster herpes virus. Current Marine Scotland advice to the Highland Council when considering planning applications is that water temperatures in Scotland do not reach a level where spawning will occur and remain at that level for long enough for viable spat settlement. We note, however that there are feral populations of Pacific oysters at similar latitudes and water temperatures in Norway and Denmark which seem to be self sustaining and we feel that the advice that we are given takes little account of

projected climate change. We therefore welcome the provisions that seek environmental risk assessment, monitoring and mitigation plans to be submitted in support of licencing applications. In fact we have sought similar documents in relation to planning applications for the culture of locally absent sea urchins, and Pacific oysters in recent years.

We would suggest that it should be explicitly set out whether or not the requirements referred to in the consultation apply to Pacific oysters and Rainbow Trout. If these species are included in the requirements for monitoring and risk assessment then the Council would welcome this. If they are not currently included in such requirements then we recommend that they are.

I hope that this information is of assistance, please do not hesitate to contact me should you require any additional information.

Yours sincerely

James Bromham
Aquaculture Development Officer