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Your Ref:

If telephoning ask for:
Eilidh Johnston

13 January 2012

Dr Chris Horrill
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Dear Dr Horrill

RIVER YTHAN TRUST BIOSECURITY PLAN

Thank you for providing the Scottish Environment Protection Agency (SEPA) with the opportunity to comment on the above consultation document.

SEPA welcomes the development of biosecurity plans across Scotland. We believe that they have a key role to play in contributing to the implementation of the River Basin Management Plan (RBMP) for the Scotland River Basin District as many of the actions for tackling invasive non-native species will assist Scotland to achieve the priorities outlined in the RBMP. The details of our response are attached as an appendix to this letter.

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record. If you require further clarification on any aspect of this correspondence, please contact Eilidh Johnston at SEPA, Erskine Court, Castle Business Park, Stirling, FK9 4TR (Tel: 01786 452611, email: eilidh.johnston@sepa.org.uk).

Yours sincerely



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Appendix: SEPA Response to River Ythan Biosecurity Plan

1. Introduction

SEPA welcomes the development of biosecurity management plans across Scotland. We believe that they have a key role to play in contributing to the implementation of the river basin management plan (RBMP) for the Scotland river basin district, as many of the actions for tackling invasive non-native species (INNS) will assist Scotland to achieve the priorities outlined in the RBMP. We welcome the links made to the river basin management plan for the Scotland river basin district and the North East area management plan in the document, and would be happy to work with the River Ythan Trust to develop further links between the Biosecurity Plan and the North East area management plan.

SEPA also supports the role that the biosecurity plan will perform in assisting the aims of the Ythan fisheries management plan, and welcomes the integrated way in which the plans are being produced and the thorough consultation.

We understand that the production of biosecurity plans across Scotland is being coordinated by Rivers and Fisheries Trusts of Scotland (RAFTS) and we particularly welcome the recognition that the spread of INNS is not isolated to the Ythan and the clear links with neighbouring fisheries organisations in this document. This could be also broadened to include local authorities and fisheries boards.

The plan has been considered by a number of relevant staff in the Agency. General and detailed comments provided by staff are included below.

2. General comments on the plan as a whole

The River Ythan biosecurity management plan is a helpful document which provides a clear and easily understood framework for tackling biosecurity issues within the Ythan catchment. It contains ambitious targets for which ongoing funding will be required to address this long term challenge.

SEPA commends the plan for comprehensively detailing effective measures and actions to address INNS issues in terms of their prevention, detection and control, through education, stakeholder involvement and partnership working. Whilst the three primary objectives all deal with INNS, understandably as these are the main focus of this work, with it being led by fishery interests it is felt that more consideration could be given to fish health issues. The risks associated with movements of fish for stocking are touched on in the Plan, raising the issue of contamination, in terms of disease or introduction of alien species such as Signal crayfish, and the risk of competition over resources posed by Rainbow trout escapes. They should also include the wider risks associated with stocking fish from different river catchments, highlighting the potential impact on the genetic integrity of wild stocks that could be caused by released or escaped fish.

If more routine monitoring is going to occur in the Ythan catchment, consideration of how fish monitoring can contribute to assessing fish health could given in the plan, particularly as this may provide the first sign of a serious health problem, such as *Gyrodactylus salaricus*, or escapes of non-native fish.

We also suggest that a 'key contact' list (or simply addresses and phone numbers) for organisations involved in biosecurity in the Ythan catchment could be a helpful part of the document.

3. Biosecurity Plans and River Basin Management Planning

The river basin management plan (RBMP) for the Scotland river basin district (RBD) was published in December 2009 and is available on the SEPA website [SEPA - River basin planning](#). This provides the most up to date picture of the current status of the Ythan's lochs, rivers, coastal and ground water bodies in Water Framework Directive (WFD) terms and will show where any water bodies are achieving less than high ecological status due to the presence of water dependant INNS. The classification results will be updated each year based on new monitoring data and developments in the classification process. Information for specific waterbodies is available on the RBMP interactive map.

It would be useful for the River Ythan biosecurity plan to put the actions detailed in the plan in context in terms of their potential contribution to the two key aims of the WFD and the RBMPs. These aims are to improve water bodies to good status where required, for example where INNS are present, and to prevent any deterioration in water bodies, for example those not affected by INNS

In the current classification there are no water bodies or protected areas in the Ythan catchment downgraded due to INNS. However, we acknowledge that there is no complete dataset for INNS in Scotland, particularly with respect to riparian INNS, and we are working with SNH, RAFTS and other organisations to improve it.

4. Data sharing

Both RAFTS and SEPA are improving and developing monitoring to include INNS and we are working to develop efficient ways to share data. SEPA ecologists have started recording riparian INNS at all routine ecology monitoring sites and already record other alien species on the UKTAG high-impact list when they are found. The riparian monitoring involves recording density and extent of Rhododendron, Japanese knotweed, Himalayan balsam and Giant hogweed at planned monitoring sites.

The outcomes of these discussions will help us refine the way we characterise and classify water bodies in relation to INNS, particularly the riparian plants that will be incorporated into the morphology classification. It will then help RAFTS and individual fisheries trusts target practical action on the ground to areas most in need of control measures.

5. Specific comments

Comments and suggested amendments are given below for numbered sections of the plan.

Page 1: In the first paragraph of Section 1 'invasive' is repeated – 'invasive non native invasive species'

Page 2: In Section 2, reference is made to the Draft North East Area Scotland Management Plan. This plan has now been finalised, so the word 'draft' should be removed.

Page 7: In Table 1, we welcome the clear links to the river basin management plan for Scotland and the North East area management plan. It is also encouraging to see the explicit link being made between the biosecurity plan and the national *Gyrodactylus salaris* contingency plan, as local action could be vital in the event of a future outbreak.

Page 11: Whilst they are found in fairly isolated lochs situated in the coastal area of the Ythan district, it would be useful to include pike and perch within Section 4.3 to highlight their presence (as described in the RYT Fishery Management Plan (FMP)) and any possible control measures that may be needed. Their release into the Ythan and associated waterways could pose a significant threat to resident fish populations.

Page 11: In section 4.3.1, Water Crowfoot is listed as a current biosecurity issue. Our ecology staff have advised that Water Crowfoot should be written as 'Ranunculus subgenus batrachium' (rather than 'Ranunculus and sp.'). as this includes all the Water crowfoots but not all the other Ranunculus species. They also advise that this group is native to northern Scotland, citing references from Perring and Walters (1982), Haslam (1982), Holmes (1985), Preston et al (2002).

Page 15: In Table 4 there is a typo in the latin name of the bullhead – *Cotus gobio* should read *Cottus gobio*.

Page 15: Kyle of Sutherland Fisheries Trust biosecurity plan has included a section 4.3.3 on fish health and genetic issues. We recommend that it would be wise to include a similar section within the RYT Biosecurity Plan, particularly as the RYT FMP highlights that non-native species and native species from outside of the Ythan catchment have been stocked into local fisheries. It is appreciated that the driver for the inclusion of this section in the KOSFT Biosecurity Plan is the presence of caged salmon smolt farms in the catchment, but the points it makes are equally applicable here.

Page 19-20: In Table 7 (Roles and/or actions of key government and non government agencies in promoting awareness of INNS issues), the actions for SEPA have been agreed with RAFTS nationally and we confirm that we are happy with this text.

However, there is no mention of Marine Scotland Science in Table 7. They are a key government agency in promoting awareness of INNS issues. They have a key role in promoting good practice to the aquaculture industry and disseminating information on priority diseases such as *Gyrodactylus*. They also have a central role in regulating the introduction of fish, and issuing guidance on stocking best practice.

Page 24-26: in the section on Actions and Timeframes, we are generally content with the references to SEPA as contributors.

However, under the final action in Output 1.1, we advise that our work with schools and local environmental groups is currently limited, so it may be advisable to remove us as partners from this action.

Under Objective 2, we can offer partner support on 'Training of 'eyes''.

6. General comments on the action plan

Working with the North East Area Advisory Group (NE AAG)

There are some actions throughout the biosecurity plan which members of the North East AAG may be able to assist with. If INNS are a priority for the AAG area, and if there is not already a group to take these actions, it may be appropriate for an INNS group to be set up under the auspices of the AAG to focus on how these actions can be best implemented. Such a group may include more than one biosecurity plan in the area and an area-wide (or wider) approach to e.g. awareness raising may be a more effective.

For information and any further discussion, the North East AAG is chaired by Anne Anderson (email: anne.anderson@sepa.org.uk) and the coordinator is Eilidh Johnston (email: eilidh.johnston@sepa.org.uk).

Liaison with SEPA staff

The plan should mention that SEPA local operations staff will be contacted for comment on any proposed INNS control and eradication programme that may impact on the water environment to ensure appropriate mitigation measures are taken. The River Ythan biosecurity plan is covered by the area of SEPA's North Grampian and Speyside team. The contact for this team is Ian Urquhart (email: ian.urquhart@sepa.org.uk).

Restoration Fund

SEPA's Restoration Fund helps projects that deliver improvements to wetlands, rivers, lochs, estuaries or coasts, thereby contributing towards achieving WFD objectives as set out in the RBMPs. In the past this has included control of non native invasive bank side and instream plant species. The Fund is currently supporting some of RAFTS practical eradication work. More Information on the Fund is available on our website: http://www.sepa.org.uk/water/restoration_fund.aspx.