

Scottish Natural Heritage consultation response

Thankyou for sending through the draft Ythan Fishery Management Plan. The plan is well written and informative with clearly set out objectives. In addition, we have the following comments:-

- * American signal crayfish should be North American Signal Crayfish
 - * recommend you make full reference to the Biosecurity Plans that are being developed by RAFTS members
 - * It is noted that there is stocking with salmonids. With regards to following, "The YDSFB hold no genetic data at present. A full mapping programme to determine the genetically distinct salmon populations of the system is desirable," we consider that it is essential, especially at a time when the FASMOP (Focussing Atlantic Salmon on Populations) programme is in full flow. Reference should also be made to the ASFB (Association of Salmon Fishery Boards) policy guidance on stocking as well as the stocking guidance produced by Marine Scotland in recent years
 - * It is important that all fish species are incorporated into the plan as well as salmon and trout
 - * On page 7 section 3 - please mention that all 4 water bodies described are designated parts of the 'Sands of Forvie, Ythan Estuary and Meikle Loch Special Protection Area (SPA)
 - * On page 8 in paragraph 2, please refer to Forvie National Nature Reserve, without 'the'
- in same paragraph, remove 'candidate' from before Special Area of Conservation as this has now been declared. RAMSA, should be Ramsar
- * On page 15, 4.2: legal fishings not fishing's
 - * On page 19 Sand Loch paragraph: perch not erch
 - * 5.4.2 Predator Control: The control of grey and common seals is not permitted within the Ythan estuary - change to estuary

Also please note: The reason given for not permitting the control of seals withing the NNR could be improved. In SNH's official response to Scottish Government when an application to control seals was made, we responded that ' The control of seals within the estuary is considered inappropriate by SNH who manage the NNR, due to a lack of evidence of damage to the fishery and that a key attribute of the reserve is primacy of nature and promoting public awareness and enjoyment'.

Seals are a popular attraction for visitors to the area and it is anticipated there would be a high level of public objection to the proposal

- * On page 24, 6.4 Water quality - An observation that may be worth including in this paragraph is that there have been slurry and diesel spills into some of the tributaries of the Ythan in recent years
 - * On page 24, 6.5 Predation - What evidence is there that predation by piscivorus birds is increasing?
- Predation by seals 'remains a problem' - seal predation of salmonids is a natural occurrence. Is there any evidence that seal predation has affected fish stocks in the Ythan estuary?
- * On page 25, 6.6.1 'The Scottish Executive' - should be The Scottish Government?
 - * Glossary: SNH is not included in the list but is mentioned in the text

- * Other comments: There is a YSFB/University of Aberdeen seal scaring project taking place summer 2011, perhaps this could be mentioned in the proposed projects section. Could a Piscivorus bird predation survey take place?