PE1558/E

19/05/2015



This letter is in response to petition 'PEO1558: American Signal Crayfish' submitted by John Thom on behalf of the RNBCC Crayfish Committee. The petition calls on Scottish Government to amend the existing licencing regime to allow for the commercial trapping of American Signal Crayfish in Scotland.

As Rivers and Fisheries Trusts with a focus on protecting the freshwater environment we are extremely concerned about any proposals to develop the commercial harvesting of crayfish and the creation of a market place which would inevitably follow.

It is the joint view of the Galloway Fisheries Trust, the Clyde River Foundation, the Nith Catchment Fishery Trust and the River Annan Trust that trapping of American signal crayfish is not an appropriate method of control and that by adding a commercial value it will encourage their deliberate introduction to currently uninfested catchments and waterbodies around Scotland to develop further commercial fisheries.

A number of long term trapping programs have been attempted in both rivers and lochs and there are no examples in the UK where trapping has eradicated or prevented the spread of American signal crayfish. An external review of the trapping program at Loch Ken (referred to by the petition) concluded that it failed to significantly reduce the impact or spread of signal crayfish. The number of waterbodies with crayfish populations in Scotland is still small and currently licences to trap are limited to scientific research. In contrast, in England and Wales where a licence for trapping crayfish for human consumption can be obtained, the animals are now widespread.

American signal crayfish can have a devastating impact on the aquatic environment and can affect several trophic levels by feeding on aquatic plants, detritus, invertebrates and fish. Owing to their large size and high fecundity American signal crayfish have the ability to cause irreversible changes to native species diversity. Once introduced to anything other than a small waterbody they are impossible to eradicate. Currently, the only option for removal of signal crayfish is a biocide treatment which kills all invertebrate life in the water body and is extremely costly. As this is the case, we believe that the risks associated with creating a commercial fishery and the incentives it creates for moving them around far outweigh any potential benefits.

In Scotland, crayfish are confined to a small number of waterbodies and preventing the spread into new areas is essential in preventing further damage to freshwater systems, native wildlife and the ecosystem services we all benefit from. A number of projects and campaigns have been undertaken to tackle this issue. The Check Clean Dry campaign is supported by the Rivers and Fisheries Trusts of Scotland and SEPA and has resulted in large numbers of signs and posters being displayed at appropriate points throughout Scotland. A crayfish barrier was constructed to prevent the spread of signal crayfish from the River Clyde to the River Annan. This innovative construction, specially designed with the ecology of signal crayfish in mind is the first of its type in the UK.

Eradication of American signal crayfish is currently not possible and trapping will have little or no impact. The apparently random occurrence of crayfish populations around Scotland suggests their spread has been caused by humans. Our aim should be to prevent the further spread of this species and its damaging impacts to our rivers and lochs and not to further incentivise it for commercial gain.

Any move by the Scottish Government to licence the trapping of crayfish beyond that carried out for research purposes would be wholly irresponsible and would go against all of the scientific advice of both its own advisers and independent scientists and river managers. It would risk a replication of the situation that is currently in place in England where irrecoverable damage has been caused.

Mr Jamie Ribbens Mr Jim Henderson Dr William Yeomans Mr Nick Chisholm Galloway Fisheries Trust River Nith District Salmon Fishery Board Clyde River Foundation River Annan District Salmon Fishery Board



CLEYDE RIVER FOUNDATION