

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM CRAIGNISH RESTORATION OF MARINE AND COASTAL HABITAT**

Craignish Restoration of Marine and Coastal Habitat (CROMACH) is a **coastal** community group based in mid-Argyll within the Loch Sunart to Sound of Jura MPA.

We are not against aquaculture per se but are very concerned about the environmental impact of open cage salmon farming as it is currently practised and appalled by the intention of the industry to expand on a massive scale (doubling by 2030) without first addressing the toxic pollution that is devastating the wild salmonid stocks, poisoning the seabed and killing crustaceans. These are all bad in themselves but also threaten many of our existing sustainable industries – wildlife tourism, crustacean fisheries, seaweed harvesting, shellfish diving, angling for wild sea trout, salmon and flapper skate. Jobs in the fish farm industry, shrinking in any case as a consequence of automation, are dwarfed by those dependent on tourism. The beauty of Scotland's scenery is its major attraction. Pollution apart fish farms are an eyesore.

Improved hydrographic modelling makes it clear that the faecal waste and pesticides from open cages spread far further than was originally assumed. There is insufficient information about the effects in combination, cumulatively and at low levels over wide areas of the waste and chemicals discharged from salmon farms. Emmelectin benzoate, a crustacean killer used against sea lice, can remain active for four years. Fish farms have been allowed in conjoined sea lochs without taking into account the cumulative impact of waste from multiple farms. Loch Shuna within our MPA is a case in point.

The Loch Sunart to Sound of Jura MPA was created specifically for the protection of the critically endangered flapper skate about whose habits very little is known. There is a breeding population in a deep trench in the Sound of Jura but as a mobile species they are exposed to pollution in the adjacent waters.

The ECCLR Committee's report says that SEPA's consenting and modelling regime 'does not take into account the capacity of the environment to farm that quantity of salmon. If the current issues are not addressed this expansion will be unsustainable and may cause irrevocable damage to the environment.'

Also 'an independent assessment of the environmental sustainability of the predicted growth of this sector is necessary.'

Also 'The current consenting and regulatory framework, including the approach to sanctions and enforcement, is inadequate to address the environmental issues'

The aquaculture industry has had a freedom to pollute that would not be tolerated in any

land-based situation. Despite government policy to the contrary, this industry doesn't pay to dump untreated waste into the sea.

We think there should be a moratorium on fish farm expansion, at least until the Parliamentary inquiry has issued its recommendations and these have been acted upon, and until sufficient information has been gathered to properly judge the environmental effects of fish farming, at its present size and after expansion.

Sustainable solutions must be found to the present problems and shown to work.

Craignish Restoration of Marine and Coastal Habitat  
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