

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM DR JONATHAN & MRS SUSAN WHITTLE

1. Do you have any general views on the current state of the farmed salmon industry in Scotland?

The Scottish salmon industry is of huge concern, in particular the welfare of the fish. In addition there are negative impacts on the environment with possible ecosystem collapse on the sea/loch beds; seals being shot; wrasse and lumpfish are used as “cleaner” fish which reduces wild stocks and there is damage to the wild salmon population from escapees. The massive mortality rate within the industry shows that it is not fit for purpose and shows the total disregard of life. The very fact that salmon are referred to as “biomass” demonstrates this lack of respect for a living thing. The wider environment is of concern too in the form of possible micro plastics leaching from feeding pipes, nets and liners, antibiotic resistance, and sustainability. As salmon are a carnivorous species, part of their diet consists of fish meal and fish oil made from small, wild-caught fish. This means that for every salmon that is produced, hundreds of wild fish have been caught and killed inhumanely to be used as feed. This could also impact on wild, bird and marine life further up the food chain causing food scarcity resulting in possible reduction or extinction of species.

This is not efficient or sustainable and combined with hugely high mortality rates should be classed as food waste.

The industry will also have a negative effect on tourism due to poorer water quality and loss of Scotland’s natural and beautiful landscape.

Environmental damage and clean-up costs cannot always be monetised.

2. There have been several recent reports which suggest how the farmed salmon industry might be developed. Do you have any views on action that might be taken to help the sector grow in the future?

The industry must not be allowed to expand; instead Scotland should focus on producing salmon to standards of high welfare thereby producing a premium product. Animals farmed to high welfare standards produce more nutritious food in particular where they can range freely and exercise, tending to have less fat and higher levels of essential Omega 3 fatty acids essential for brain and heart health. Stocking densities should be greatly reduced and sea pens enlarged. If the industry is to continue it must adopt an organic approach where there is no need for antibiotics and sea lice treatments. This can only be achieved by greatly reducing the numbers, allowing sea pens to fallow at the same time and giving the fish more space. Surely, it is a government’s duty to protect its people and the environment in which we live, and not big business.

3. The farmed salmon industry is currently managing a range of fish health and environmental challenges. Do you have any views on how these might be addressed?

The welfare issues range from intense confinement, as salmon migrate hundreds of miles this causes stress and restricts natural behaviours. Selective breeding causes suffering. In addition, skeletal deformities, cataracts, fin damage, skin and scale damage, deafness, heart problems, sea lice infestation and psychological suffering arises due to lack of enrichment.

Salmon are a keystone species and should not be enslaved in these inhumane conditions. It's simply wrong to keep any animal in conditions where they can't express natural behaviours causing unimaginable physical and psychological pain and suffering. There have been many studies including research at The University of St Andrews and featured on "Blue Planet" showing fish intelligence and this is another reason why we must take fish welfare seriously.

Therefore the industry should not expand; salmon farming should be to higher welfare standards by reducing stocking densities, giving them more space and leave the sea pens to fallow at the same time to help reduce sea lice numbers.

4. Do you feel that the current national collection of data on salmon operations and fish health and related matters is adequate?

No.

Mortality figures should be recorded at each life cycle and cause of death

Health issues

Water from and around farms should be tested

Number of seals shot

Number and species caught in netting

5. Do you have any views on whether the regulatory regime which applies to the farmed salmon industry is sufficiently robust?

It is not nearly robust enough. We need to have:

Fish welfare rules during every cycle of life

Slaughter rules

Water purity rules and regular testing

Observing the wider environment

Sea Lice monitoring

Quality of end product i.e. fat content of fish and check for toxins

Clear and honest labelling of salmon as to method of production so consumers can make informed choices

Sea pens are spoiling the landscape and there should be very robust planning laws in place

6. Do you have any comments on how the UK's departure from the European Union might impact on the farmed salmon sector?

This should be used as an opportunity to improve fish welfare and have a product to be really proud of. Producing less, but better. We only have one planet and must do everything we can to protect and preserve its finite resources.

If, as taxpayers we are contributing we should not be subsidising an industry that has such total disregard for life, damaging our environment now and for future generations, is unsustainable and producing food that is possibly high in fat and possibly contributing to obesity, thereby putting an additional strain on our already stretched NHS.

Instead let's focus on Scotland really being a Good Food Nation!

Dr Jonathan & Mrs Susan Whittle
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