

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM DAVID S. COSH, DOONFOOT FISHINGS

My comments have been submitted under the headings of the questions supplied by the committee although I feel some questions could be regarded as leading and restrictive. Before addressing the questions, it is my view that the ECCLR Report to this Inquiry is excellent, fair and reasonable.

I agree 100% with its conclusions especially that (a) the status quo is not an option (b) the precautionary principle should be applied and there should be no more expansion of salmon farming until (c) open net fish farming is replaced by Closed Containment everywhere in Scotland with a phased programme of changeover lasting a maximum of 5 years from 2018.

Closed Containment is the only solution to the problems caused by the currently unsustainable salmon farming. Such a move will save existing jobs, save the industry from its blinkered itself, protect the Scottish Economy from a disaster, protect Scotland the Brand from bans, and create Scottish Engineering jobs by taking a world lead in manufacturing of Closed Containment equipment.

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

The disease and parasite problem is out of control despite many promises. This undoubtedly impacts on wild salmon and other wild species. There has been for far too long devastating pollution of the environment and damaging under-regulation.

I and the general public, as seen after the BBC TV “One Show” exposure of salmon farming mortality, regard mortality within the industry as nothing short of appalling. No other farming industry would get away with it.

Radical steps must be taken to move away from open net farming. It is worse than the battery hens industry and increasingly likely that the industry will implode with catastrophic consequences for themselves and the wider environment. One need look no further than Chile to see that.

The quality of Scotland The Brand foodstuffs has been used to sell the industry’s product, but the way things are going Scottish Salmon will soon negate the quality of the name.

There are far fewer jobs created in rural areas than implied and at a cost to other jobs. Closing the beat I own on the River Doon, due to almost extinction of wild fish undoubtedly caused by sea lice infestation all along the west coast, has cost one gillie’s job and over 500 bed nights, meals, etc were lost to the local Ayrshire economy by this single beat alone.

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?

It is clear that the industry at present cannot grow without change. It has caused significant environmental damage and any increase in open-net salmon farming will only make things worse.

Growth in salmon farming must be in Closed Containment, either in tanks on land or in the sea. The Scottish Government and the industry itself should commit to phasing out all open-net farms as soon as possible and complete the changeover within a maximum of 5 years from 2018.

Closed containment would allow the industry to grow using all the skills Scotland has at present and manufacturing the equipment would give a major boost to Scottish Engineering in our manufacturing sector.

Scotland the Brand would be much safer with Closed Containment and should the industry not go this way quickly, the industry will be left behind with other countries moving this way very quickly.

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?

Closed Containment is the only way forward. Trying to grow the industry the way it is will only make things worse. Sea temperatures rising makes things even worse again but in Closed Containment the water can be drawn up from below where the water is cooler.

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

There needs to be proper open publication by each salmon farm on sea lice numbers, disease and mortality numbers. This needs to be corroborated frequently by an accountable, independent organization on unannounced visits and acted upon.

At present the data collection is done in-house, not transparent and is pretty secretive with no means of verifying if voluntary figures significantly understate the truth.

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

There is no protection for wild salmon and sea trout both of which are iconic species. There is little protection for the environment and it would seem SEPA are too weak and under-resourced in their job as watchdog.

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

I don't see how it will make much difference, but if the UK no longer has a say in EU food policy after departure, it will be easier for EU countries to support a ban on the UK's unsustainable open-net fish farming for the reasons given in the ECCLR report and also easier for the EU to join potential bans like the USA have threatened because of seal culls to protect open-nets. Closed Containment is the only way to prevent any such bans.

IN SUMMARY the only sensible, positive solution to deal with all the issues correctly concluded by the ECCLR Committee Report is for the REC Committee to recommend to Parliament legislation that creates a swift move to Closed Containment with completion of a changeover within a maximum of 5 years. No more delaying tactics by the largely Norwegian owned salmon farming industry which is polluting our Scottish environment with impunity--- the polluter is not paying the cost which enhances the profits sent to Norway. A move to Closed Containment will also give Scottish Engineering a welcome boost in jobs---if allowed to become a world leader in manufacturing this modern equipment, as is happening already across the Atlantic.

David S. Cosh
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