

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM STEPHEN 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 Scottish farmed salmon industry is, in my opinion, almost wholly responsible for the massive decline in wild salmon stocks on the west coast over the last decade. This has been caused primarily by the industry wide failure to control sea lice which attack and kill the majority of smolts returning to sea.

The industry is also entirely responsible for the dilution of the natural wild salmon gene pool due to the breeding of farmed escapees with wild stock.

Both of these issues can be dealt with relatively easily by bringing salmon farming on shore. If contained, on-shore salmon farming was made mandatory in Scotland, the devastation to wild salmon stock by sea lice and gene pool dilution would be 100% corrected.

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?

I believe that the future of Scottish salmon farming has to be on-shore.

It is a safer, more environment friendly and in the long term more cost effective and scalable solution.

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 only answer to this question is to completely, immediately and permanently halt all sea and sea-loch farming and move it to on-shore contained farms.

This will take a concerted effort from the farming industry and the Scottish Government, but it is solely their responsibility. Failure to address this issue will result in the extinction of Scottish wild salmon stocks and both aforementioned bodies will be solely responsible.

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

I cannot comment on whether the amount of research is adequate, but I do know that the general public is not aware of any of it. Public awareness of the wild salmon plight so far has been left to news bodies and private individuals who are concerned about the issue.

Much more of the research needs to be presented to the public by all bodies and not swept under the carpet by those who have financial interests in keeping it quiet.

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

It is clearly not robust or there would be no farmed salmon escapees, no sea lice overpopulation and no need to be flushing millions of litres of harmful insecticide into the sea at the detriment of shellfish and wild fish stocks.

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

I fail to see how this is a relevant question. Whether the UK is in the EU or not, it still has to clean up its act as far as salmon farming is concerned.

Stephen Cosh
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