

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM KEITH HAWLEY

There are lots of people out there far better qualified than me to submit detailed technical reports on the problems with the Scottish Aquaculture industry but I would like to make the following points:

It is noticeable that it is difficult, if not impossible, to find anyone with any knowledge of the industry prepared to stand up and support it other than those who have some sort of vested interest in it continuing. By contrast, most of the individual objectors are people who have got involved purely because they are appalled by the environmental damage caused by open net fish farms and receive no financial gain for doing so. This should tell you something

The recent call for an immediate moratorium on salmon farming expansion by Salmon and Trout Conservation Scotland (released 26th April 2018) **must** be acted on. Just look at the long list of organisations represented. They cite the recent ECCLRC report into Scottish aquaculture, which took evidence from all sides of the debate before issuing an extremely damning list of recommendations on how things need to change. How can the ECCLRC findings be ignored?

At the recent Highland Council meeting, held 17th April, two submissions by Organic Sea Harvest, for fish farms to be situated in the North-East of Skye, were decided by committee. Given that these were the first fish farm planning applications to be considered since the ECCLRC issued its recommendations, there were requests from The Western Ross Area Salmon Fishery Board and also the Skye District Salmon Fishery Board to defer any decision on the applications until a full review of the outcome of the ECCLRC has been carried out. Individual objectors also made the same point to the committee. These requests were turned down on the grounds that the report has only made recommendations so far, and there has been no change in legislation or law. Clearly the planners intend to stick their heads in the sand and carry on just as they are, which is why this call for an immediate moratorium is needed. Once a fish farm has been granted approval then there is no going back and the environmental impacts the ECCLRC are so concerned about will carry on growing.

The case officer's report for the above two fish farm applications said the following re lice control:

'One option re sea lice control would be to deploy the precautionary principle but in this case there is insufficient expert advice from any of the statutory bodies to reasonably apply this.'

This seems to show an astonishing lack of understanding of how the precautionary principle works. It should be used in just such a case as this. **In layman's terms, if you don't know the risks of doing something, don't do it!** The ECCLRC report, point 137 says *The Committee remains deeply concerned that it appears a precautionary approach has not been, and is not being, applied to the development of fish farms and in particular to farms in MPA's or in the vicinity of a PMF. The Committee questions this approach and the environmental consequences.* **It could not be clearer surely.**

This is not one of ECCLRC's recommendations for how things should change in the future, **this is them pointing out how the Precautionary Principle *should be being used right now, and it is clearly not being.*** In fact, in this instance, the case officer, a senior and experienced member of the planning department, appears unaware of how the Principle actually works. This is shocking.

The Scottish aquaculture industry is dominated by Norwegian companies, although they often masquerade under Scottish sounding names. Norway is introducing legislation to move away from the harmful effects of open net fish farms and instead use the much safer closed containment system. This is more costly and so reduces profits. Instead the Norwegian giants build fish farms in Scottish waters, often using a local fronting company to get planning approval granted before buying them out. Legislation is still much more relaxed and so there are much larger profits to be made here, much of which goes back to Norway, whilst the Scottish environment suffers the pollution and visual impact of their creations. They must be laughing all the way to the bank.

Much is made by the industry's supporters of the jobs created. If we moved to closed containment aquaculture the jobs would still be there, but the effects on the environment would be avoided.

More importantly, tourism is hugely important to the Scotland economy. We enjoy magnificent scenery and wonderful wildlife. However with every fish farm built the landscape and wildlife takes a knock. At some stage there will be a tipping point where the tourists suddenly start thinking, hang on, do I really want to go to Scotland and put up with the rain and midges only to find a fish farm has popped up in my favourite view? Tourism is booming at the moment, but we must not get complacent and believe it will continue forever. We must strive to ensure it stays a destination they want to come to. We must stop this relentless fish farm expansion and take stock.

Keith Hawley
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