

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM KIRRIEMUIR ANGLING CLUB**

1/ GENERAL VIEWS- The Nature Conservancy Council (NCC) advised the British Government in the late 1980s that more research was needed before the salmon farming industry expanded. The Government carved up the NCC in 1989 and the Scottish Environmental Protection Agency and Scottish Natural Heritage were born in the early 1990s. There was a vast difference between the NCC, which had powers to preserve the health of the marine environment around our coast, after which SEPA and SNH had none. The Government of the day and successive Governments have therefore been complicit and culpable for the abuse of the marine environment allowing salmon farms to contaminate sea lochs and coastal waters with mounds of detritus under the salmon farm pens, the introduction of new fish diseases from foreign salmon stocks, and excessive sea-lice blooms killing wild juvenile salmonids. Action is long overdue to reverse the expansion and development of salmon farms at sea and to replace them with land-based closed containment farms.

2/ The salmon farm industry must be brought onshore by using closed containment methods under the full scrutiny of SEPA, SNH, and Marine Scotland.

3/ SEPA and SNH must exercise more powers to rigorously stop further pollution and diseases emanating from salmon farms. This requires the Scottish Government to cease directing these quangos to be gentle with this industry and to stiffly penalise fish farmers who don't achieve health targets, lose fish, use excessive chemicals, and more. The high percentages of farmed salmon mortalities, highlighted in the media recently, was predicted in 1989 by C.M.Lumb Chief Scientist Directorate NCC in "Self-pollution by Scottish Salmon Farms" – Science Direct.

4/5/6/ To illustrate the fine line taken by salmon farming regarding Scottish Law- "Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 5 Prohibition against using explosives & other noxious substances for the destruction or taking of fish. (1) Any person who (b) puts any poisonous or other noxious substance in or near any such waters with intent to take or destroy fish (-Ref: Legislation.gov.uk)". If the current national data collection and regulatory regime had been sufficiently robust the death and destruction of the marine environment, in the locations of the salmon farms wouldn't have been tolerated- The NCC would have seen to it if still in existence. Derek Radcliffe hit the nail on the head in 1990- "And of the very few issues largely confined to and handled by Scotland, the virtual free-for-all explosion of fish farming should make us fear the worst." (-Ref: New Scientist 10/2/1990 Forum 9<sup>th</sup> September 1989 'The End of British Nature Conservation- The Break-up of the Nature Conservancy Council could mark the end of a coherent approach'.)