

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM KYLE OF SUTHERLAND DISTRICT SALMON FISHERY BOARD

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

The industry is currently insufficiently regulated in terms of its impacts on wild salmonid fish. Within our fishery district, evidence collected by the Kyle of Sutherland District Salmon Fishery Board in conjunction with Marine Scotland Science Fish Health Inspectorate highlights the continuing issues of escapes from freshwater smolt production units. At the present moment it appears that the burden of proof falls largely on the wild fisheries sector to demonstrate that such problems exist. We suggest this is inequitable.

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 is unsustainable in its present form and further development should only be permitted if suitable mitigation is both developed and fully utilised in order to resolve the range of environmental problems associated with the industry.

We note that the current presumption against development on the north and east coast of Scotland was discussed at the Committee meeting of 18th April. We support the presumption against further finfish farm development on the north and east coasts of Scotland to help safeguard migratory fish species. We also support the position of Fisheries Management Scotland that the current regulatory system does not sufficiently protect wild fish and we consider that a new regulatory system should be put in place prior to any growth in consented biomass.

The north and east coast of Scotland includes 12 rivers designated at SACs for Atlantic salmon or where Atlantic salmon is a qualifying feature in site selection. The marine migration routes for these fish are largely unknown. Whilst some research has been completed, or is currently underway as part of strategic research relating to offshore wind farms, the risk of potential impacts from open pen sea cages on Atlantic salmon and sea trout populations is currently too high. We note that these concerns were also highlighted in the ECCLR Committee report and we support the view that 'in order to mitigate the risk of transfer of sea-lice, fish farms should be located away from salmon migration routes.

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 issue of escapes from open cage smolt production facilities is readily tractable via the adoption of land-based production facilities utilising recirculation technology. We are aware that this technology is already utilised by some producers in Scotland and, indeed, is the industry norm in many other countries. We suggest that in future

open cage smolt production is prohibited in Scotland with a short transitional period allowed in order to facilitate the required infrastructure development and associated financial investment.

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

No. Currently the industry effectively self-reports on a number of key issues such as escapes. The work undertaken by Marine Scotland Science with the assistance of the Kyle of Sutherland District Salmon Fishery Board in Loch Shin demonstrates that escapes are likely to be significantly under reported.

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

We fully support the views of Fisheries Management Scotland on this matter.

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

We have no comment to make on this issue.

Kyle of Sutherland District Salmon Fishery Board
April 2018