

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM LOCH SUNART AND THE SOUND OF MULL COMMUNITY ASSOCIATION OF LOCHS AND SOUNDS (CAOLAS)

CAOLAS is a community group based in Sunart, Morvern and Mull which promotes sustainable use of local waters for recreation, fishing and other marine activities. Our membership includes professional fishermen, divers, fish farmers and boat operators as well as local people with an interest in the marine and coastal environment. We work towards an integrated and collaborative approach to management.

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

The salmon industry has positive and negative impacts on the local area. Strong positive impacts relate to the socio-economic benefits of this industry, especially local jobs. Local salmon producing companies are community minded, and provide jobs without subsidy, unlike many land-based industries. Salmon farmers have taken on board many concerns and actively work to address these. Negative impacts relate to effects of this industry on the natural environment and, to an extent, on the tourism industry. CAOLAS believes that, wherever possible, action should be taken to reduce these environmental impacts while maintaining the important role that this industry plays.

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 should be developed as part of an integrated marine strategy for coastal communities that takes into account the relative importance, and potential for growth, in different sectors. This strategy should consider both socio-economic and environmental factors.

The farmed salmon industry should be expanded only if the environmental impacts are clearly understood and mitigated.

At present we do not think that the environmental impacts, particularly on wild salmon and on marine priority features are clearly understood. With regard to expansion on current sites we would support a precautionary approach, incorporating comprehensive monitoring of current impacts on the site and their local effects, and adaptive management where these impacts are judged to be negative. These data must be in the public domain for us to be able to support this. We are particularly concerned about the location of salmon farms near or within Priority Marine Features and Marine Protected Areas. These are areas of national and international importance with complex habitats and sensitive species which salmon

farming has effects upon. We would like to see a review of the evidence of the effects of fish farms on these features, identifying sites where fish farms are having impacts and allowing adaptive management and relocation or redistribution of farms to take this into account, with amendments to planning requirements if necessary. We believe that new developments where significant risks will be posed to the marine features for which an area is designated, or to the ecosystem itself, should not be permitted.

Before considering expansion, we believe that the industry should focus on minimising its environmental impacts. We believe that there is evidence that the industry has caused and continues to cause damage to wild salmon populations, to populations of wild fish like wrasse, to seabed habitat, to other marine life, to seals, to cetaceans and to the tourist industry. The current level of impact is not acceptable to many of our members.

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?

We believe that self-regulation of the industry has not so far been in the best interests of the natural environment or the industry itself. If this system is to continue, it needs to be radically reformed. Some producers have made concerted steps to address issues, but the effects of the farmed salmon industry are wider than on the wild salmon fishery. There has been little investigation of these wider effects, even within Marine Priority Features, such as those found in Loch Sunart. We believe that a single body should be appointed to fully regulate the industry, that this regulator should make decisions based on the impact of salmon farms on the natural environment and that regulation should be based on sound science and data.

We agree with the ECCLRC and Professor Paul Tett that independent research on Recirculating Aquaculture Systems and offshore farms should be commissioned as a matter of urgency. We would hope that community marine groups would have a presence on any task force set up to do this.

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

No. Data on fish health, sea lice, farmed fish escapes, wild wrasse and lumpsucker catches, and other relevant information should be collected and held in the public domain and made easily accessible. These data should be adequate for robust analysis, at the level of individual farms. Monitoring of the environmental impacts of salmon farms, for example nutrient enrichment and the effects of chemical treatments on the aquatic environment should be adequate, as judged by an independent advisory body. The costs of monitoring should be borne by the producer. All data should be in the public domain and easily accessible.

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

Judging by the effects this industry has had on the natural environment, we consider that the regulatory regime for salmon farms has not been not robust or effective. There is more than one solution to this, but we suggest that a single regulator would be better placed to bring all farms up to the required standard.

Loch Sunart and the Sound Of Mull Community Association of Lochs and Sounds
April 2018