

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM MELVILLE MCDONALD

General Views

I have been watching and listening to the various committee 'evidence' sessions with considerable interest as it has been my view for many years now that commercial gain from salmon farming, blindly supported by the Scottish Government, has taken precedence over the real impacts of fish farming in Scotland for many years now.

It is no different in other countries such as Canada Norway and Chile where fish farming is prevalent. Governments are finally coming to realise the effect of the environmental impacts but are generally slow to react. It has become quite clear that the Scottish Government have failed to properly monitor and control the growth of this 30+ year old industry and have failed to preserve the rich marine environment that Scotland enjoys particularly on our west coast. Regulatory government bodies have largely been ineffective. This has had other negative impacts. Salmon Fish farming has been allowed to expand at cost to the environment, at cost to marine life, and at cost to wild salmon and seatrout stocks. The latter provide a far greater commercial benefit from angling and angling tourism and support many more jobs to Scotland than Fish Farming has ever done.

Of course it would be ideal if all these interests could co-exist. However the reality is that as things stand that will never be the case unless there is a sea change in the way in which salmon farming is operated and managed in the future. This can be achieved but will require the industry, with support of government and regulatory bodies to adopt a joined up, efficient, and effective management environment.

Development

In my opinion the only effective way for salmon fish farming to continue and to grow is within close containment land based systems. Salmon were never designed to be wholly grown in the sea. In the natural world wild salmon start their lives in fresh water river, go to sea to grow, and return to the freshwater rivers of their birth to spawn and recreate. It is for the reason that salmon farming is largely carried out in salt water that most of the major problems including sealice proliferation exist. Outwith their natural environment they are more prone to other disease risks. The salmon farming industry has spent millions trying to control sealice and diseases to create the perfect product for the market. In reality the quality of the flesh of farmed salmon bears no resemblance whatsoever to the quality of the flesh of wild salmon.

The flesh is artificially treated to give it a 'natural, colour and the quality of the feed is extremely questionable. The public are being offered a poor alternative and in many cases are now being turned off by the problems now become more visible in the industry. Personally I would not feed farmed salmon to a cat let alone eat it myself.

Open cage farming is not a viable solution and the industry and the government need to realise that. The sooner the better. Utilising the north and east coasts of Scotland for open cage salmon farming is an unworkable and frankly stupid idea.

No further expansion of open cage sea farms should be permitted and planning authorities should be advised. The granting of licences in Sky this week in the face of the evidence coming from the current enquiry is nothing short of criminal.

Challenges

The challenge for the industry is to create a commercially marketable product that is safe to eat and has been produced in an environmentally friendly way without impacting adversely on other fish stocks or marine life. The challenge is also to eliminate the threat to wild salmon and sea trout stocks that are already in serious decline. Fish farming is only one of a number of threats to wild fish. Uncontrolled in-river and coastal predation is another major issue. Are our wild fish not worthy of greater protection? The further challenge is to achieve a viable industry that is sustainable. At the moment the proposed growth targets are totally unsustainable.

Collection of Data

It is patently clear that inadequate data to monitor production, mortalities, sealice numbers, and disease has been substandard. The Scottish Government is just as guilty as the salmon farming industry in failing to put in place robust and enforceable management controls. There must be a more effective and open system which is available to regulatory bodies and the public. It is in the public interest.

From what I can see bodies such as Marine Scotland, SEPA, SNH and Local Authorities are working totally independently and not working well. There is a lack of guidance from Government as to their responsibilities. Presently they have no discernible accountability. I am amazed that none of these bodies is able to say whether or not they have had any impact on fish farming practices. This has to change.

Regulatory Regime

To date the regulatory regime has been flawed, inefficient and inadequate. There is a lack of cogent communication and a lack of joined up thinking. A single body accountable to the Scottish Government Minister for the Environment would be a better option than the current fragmented inefficient and unfit for purpose regime.

Departure from EU

It is difficult to surmise exactly what effect our departure from the EU will have as regards the salmon farming industry. Hopefully following the results of this enquiry it might be better regulated and managed under the control of Scottish government. No MSP can now say with their hand on their heart that they don't know about or understand the impact of salmon farming in Scotland. They must all be aware of the issues which face the industry currently. One thing is certain and that is that if the salmon farming industry does not clean up its act in the very near future that it will

find it increasingly difficult to market its products either at home or abroad. The public are actually quite discerning when it comes to the food that they put in their mouths and it seems they have been fooled for too long. They are awakening to the reality.

Melville McDonald

April 2018