

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM NESS DISTRICT SALMON FISHERY BOARD**

The Ness District Salmon Fishery Board is a statutory body responsible for the protection and enhancement of migratory salmonid (salmon and sea trout) fisheries in the Ness District on the East coast of Scotland. District Salmon Fishery Boards are statutory consultees in the aquaculture planning process. There are three existing sites located within our area of operation: Loch Garry Freshwater Cage Fish Farm at Invergarry, Loch Ness Freshwater Cage Farm at Dores and Inchmore Hatchery in Glenmoriston. Our comments regarding this application reflect those of our representative body Fisheries Management Scotland and are provided below.

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

We concur with the ECCLR Committee view that '*the sector is not being regulated sufficiently or regulated sufficiently effectively*' particularly in relation to the protection of wild migratory fish. The powers of the Fish Health Inspectorate (limited to the health and welfare of farmed fish) cannot be used to regulate any impacts on wild fish. SEPA's process for consenting biomass does not take into account any impact of sea lice on wild fish which may be associated with that biomass.

Whilst monitoring of impacts on wild fish has become a condition of recent planning decisions through a requirement to produce an Environmental Management Plan, local authorities accept that this is an imperfect solution and we are not sure whether this approach has been adopted beyond Highland and Argyll Councils. We consider that there should be a root and branch review of the planning and regulatory system for aquaculture. Specifically, it is crucial that monitoring of wild fish, with an appropriate and precautionary feedback to farm management, should become a statutory responsibility on all farms, including currently consented farms. All regulatory bodies should be given appropriate legal powers and duties to protect wild fish. Until such time as a new regulatory regime is in place we do not believe that changes, such as SEPA's DZR approach, should be taken forward in isolation.

We recognise that aquaculture is one of a number of potential impacts on wild fish. Some of these impacts on the high seas (such as climate change induced changes in food availability) are out with our control. However, of those potential impacts within human control, the impacts of fish farming *on wild fish* is the only example that does not have a regulatory system in place in Scotland.

#### **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?**

We recognise that aquaculture is vital to Scotland's economy and the West Coast of Scotland in particular. However, our focus is on ensuring that the development of the industry is firmly grounded in the principles of sustainable development.

The growth targets included within *Aquaculture Growth to 2030* are industry targets, not Government targets. There has been no assessment of the environmental sustainability of these targets, nor have they been subject to Strategic Environmental

Assessment. The report includes only passing mention of the environmental challenges facing the industry and no mention at all of wild fish interactions.

The Aquaculture Industry Leadership Group (AILG) was discussed in Committee on 25<sup>th</sup> April. What was not clarified was that the AILG has effectively replaced the Ministerial Group for Sustainable Aquaculture (MGSA), thereby leaving a significant gap in addressing interactions between farmed and wild fish and the wider environment. Fisheries Management Scotland and Scottish Environment LINK both contributed to the MGSA but are not involved in the AILG. Given that salmon farming takes place within a shared space, we are concerned that discussions with a direct bearing on interactions are now taking place in isolation from wild fish and wider environmental interests.

We do not consider that industry growth targets should be adopted by Scottish Government, or included in the National Marine Plan, without a robust assessment of the environmental carrying capacity for increased growth, including existing farms.

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. Further planning applications for new sites, or increased biomass at current sites, should be deferred until a new regime is in place. We would emphasise that this would still allow growth in overall production, through reduction in mortalities.

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

We would like to emphasise the international concern relating to the impact of escapes, both in marine and existing freshwater sites. In Norway, escapes of farmed fish are considered to be the greatest threat to wild salmon. Despite significant investment by the Scottish industry, escapes continue to happen. It is not an offence to have an escape – the only offence is failure to report an escape or failure to report circumstances that may have led to an escape. We believe that there should be a requirement for each farm to retain genetic samples, or otherwise mark fish, to allow the source of escapes to be identified. Such genetic techniques were recently used by Marine Scotland Science to demonstrate that escaped farmed salmon captured in Loch Shin originated from both of the freshwater producers operating in the loch.

We support the presumption against further finfish farm development on the north and east coasts of Scotland to help safeguard migratory fish species. We would also emphasise there are also important salmon and sea trout fisheries (from both a socio-economic and conservation perspective, including SAC rivers) within the aquaculture zone which could and should benefit from further area-based protection.

The Aquaculture Stewardship Council (ASC) currently prohibits the production of smolts in open cages in freshwater. There are proposals to relax the prohibition of farming of smolts (primarily due to low take-up of the standard by the Scottish Industry) which, if agreed, would require operators to establish a genetic baseline for local wild salmon which should be monitored appropriately to demonstrably ensure there is no (further) introgression, and a minimum stocking size to prevent 'drip' escapes in freshwater lochs. Whilst these safeguards are welcome, we emphasise that the technology to produce smolts in full closed containment is well established in Scotland and we consider that the production of smolts in freshwater cages should be phased out over an appropriate timescale.

We consider that Recirculating Aquaculture Systems (RAS), or closed containment, have a significant role to play in the future of the Scottish salmon farming industry. Whilst we recognise that the technology is not currently ready to roll out in the marine environment in Scotland, we are aware that significant investment is occurring in Norway, incentivised by the Norwegian Government. We are strongly of the view that incentives should be made available in order to facilitate the development of such technology in Scotland. Various forms of semi-closed production, such as deployment of sea lice skirts, are now being used in Scotland and we are keen to understand the benefits of such systems to wild fish. We are also aware that it is now possible to reduce the marine phase of production to less than one year through growing fish to 1kg or greater in closed containment, prior to on-growing in sea cages. We believe that this, coupled with area fallow periods during the wild smolt run, could be a significant step forward. There is now a great deal of evidence that lice levels in the environment are significantly higher in the second year of the production cycle. By harvesting fish before production moves into the second year, and fallowing the whole production area, there is the potential to reduce the number of sea lice in the environment to the benefit of wild fish.

Ness District Salmon Fishery Board  
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