

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM NIALL MCKILLOP**

For the purpose of this submission, I wish to identify with two other submissions already received for consideration, they are those submitted by Lochaber Fisheries Trust and Wester Ross Fisheries Trust, which explain in detail the deep seated problems around salmon aquaculture today and point toward solutions.

I have fished for wild trout and salmon among the lochs and rivers of The Highlands for over sixty years. I am a member and former regional chair of Salmon & Trout Conservation Scotland, the wild fish conservation charity that has fought so hard to bring about this review of aquaculture. I am associated with the Scottish Salmon Think Tank and, most recently, have been a founding associate of the Salmon Aquaculture Reform Network Scotland, (SARNS).

The first salmon farm I saw was in 1967 from the bridge of a ship in in the Magellan Strait in southern Chile south of Punta Arenas. I was twenty and thought to myself then, what a good idea this would be for the West Highlands. Having reflected for fifty years on that thought, most seriously over the past two decades, the current evidence reveals that I was, at that time, very seriously mistaken. The situation today is that the salmon aquaculture industry is out of control: it's diseases and parasites are out of control as are its regulation, its disregard for our environment and its acceptance of mortality rates which, were they present in terrestrial stock, would cause a public outcry and lead to prosecutions.

I can do no better than to quote sections 350 to 355, the concluding paragraphs of the recent ECCLR Committee report into the Environmental Impacts of Salmon Farming.

350. There need to be changes to current farming practice. The industry needs to demonstrate it can effectively manage and mitigate its impacts.

351. Scotland needs an ecosystems-based approach to planning the industry's growth and development in both the marine and freshwater environment, identifying where salmon farming can take place and what the carrying capacity of that environment is. A cohesive framework is needed.

352. As a matter of urgency, the Committee wishes to see independent research commissioned, including a full cost-benefit analysis of Recirculating Aquaculture Systems (RAS), and a comparative analysis with the sector as it currently operates in Scotland, alongside further development and implementation of alternative technical solutions, supported by the use of incentives.

353. Adaptive management which takes account of the precautionary principle, (using real-time, farm by farm data) could have the potential to reduce environmental impacts but additional detail is needed on how it would be applied in practice.

354. The Committee is supportive of aquaculture, but further development and expansion must be on the basis of a precautionary approach and must be based on resolving the environmental problems. **The status quo is not an option.**

355. The current consenting and regulatory framework, including the approach to sanctions and enforcement, is inadequate to address the environmental issues. The Committee is not convinced the sector is being regulated sufficiently, or regulated sufficiently effectively. This needs to be addressed urgently because further expansion must be on an environmentally sustainable basis.

The REC committee inquiry needs to take these paragraphs very seriously and act swiftly to prevent an ecological disaster which will lay waste to our precious West Highland environment

Niall McKillop  
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