

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM NICK JOY

I am the ex Managing Director of Loch Duart Limited. I have been in aquaculture both Scottish and global since 1979. I am currently the Chairman of the West Sutherland Fisheries Trust (a wild salmonid and fish environmental Trust), a Non Executive Director of Loch Duart Ltd and of Otter Ferry Seafish Ltd. Also A Trustee of a community wind farm project in Kilry Angus. Owner of a beef and sheep farm on Eday in the Orkney isles.

What will not be added by advocates: my income comes from a mixture of salmon farming, beef and sheep farming and journalism. Thus I have a broad income from various rural interests.

Though I cannot be absolutely sure I believe that this is the 5th inquiry into salmon farming during my career. The criticisms haven't changed in all this time. The scientists continue to call for more research, which is so surprising. The advocates continue to repeat the same imponderable arguments intended to destabilise but aware that none can be proved. Both groups are looking for the precautionary principle to be used to allow them time to maximise their opportunity.

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

Salmon farming has been the saving of considerable tracts of the West Coast of Scotland and the Isles as well as an enormous economic success. It is a young industry developing without subsidy and in a climate of high criticism with a very small body of evidence suggesting any damage at all. This has never stopped those that wish the industry ill. It is time this was properly redressed with studies which look critically at the supposed damage, the first being that the decline in salmon and sea trout runs on the West coast is any different that the decline on the East coast. I am calling for a proper statistical review by an impartial group of statisticians, evaluating the decline on both coasts. Secondly the same group to look at the runs of both species over the last 100 years.

The Scottish salmon farming industry is simply too important to these fragile rural areas be held back and restricted by unfounded criticisms. It is important to note that if these criticisms were applied to agriculture, we would not be able to feed ourselves, nor would the agricultural industry we know today exist.

Just as importantly while Scotland reviews the industry, Norway continues to develop. Whether in salmon or other species, Norway is investing and at a quite considerable pace, meanwhile Scotland is falling behind. As Scotland is a relatively small player this means that it is regarded as a poor place to develop new techniques, equipment, medicines or invest in novel species.

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?

It depends what you mean by sector. As this is an enquiry into salmon farming then its growth depends on sites and controlling the health issues which have constrained it over the last few years. These will pass and it depends whether Scotland's overweening regulatory climate continues to develop. Unless Scotland simplifies and clarifies salmon farming will not grow significantly.

There have been many reports over the years about how salmon farming might develop. I have read many of them. The most usual and most spurious is the suggestion that salmon farming should move into tanks on land. By those who know this is usually referred to as high carbon use, high cost farming. It is useful to note that the people who use it as a solution have never ever invested in it. If it is their belief that this is the solution then there is a simple way for them to prove it. Meanwhile back in the real world, the way forward for such a young industry is careful thoughtful site placement to minimise benthic impact and to allow growth.

The corporatisation of food has created much larger companies producing food on a low cost basis. Salmon farming shares this with many other sectors. The drive for cheap rather than good food is global. If the government really wants to change the way that the sea is farmed then it will have to push for a more diverse aquaculture. There are other species grown but they suffer from much more complex lifecycles than salmon and without support they will not develop. Diversifying away from salmon would also calm the wild salmonid sector down as well.

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?

In a young industry that is learning how to farm the sea, it is hardly surprising that it suffers from health issues. Sea lice are coming under control as the industry learns how to use cleanerfish and the new threats of the gill diseases are starting to be tackled. Time is the answer to both. However there will be new diseases. Agriculture still faces issues with disease, medicine resistance and environmental issues so it is inevitable that aquaculture will.

I am interested by the raising of environmental issues. Since I started working in aquaculture in the early 1980's, some critics have been suggesting that there would be an environmental catastrophe because of the industry. Farming impacts nature. This is a fact. The question is what is a real impact and what is not. For certain there has been no catastrophe either in Scotland or in Norway where farming is much larger and more widespread. The impacts of aquaculture are short term and reversible and very similar to agriculture. Why treat it differently?

More importantly the perceived impact on wild migratory salmonids has been imputed for some time, yet all the evidence suggests that the decline on the East coast is very similar to the decline on the West. All attempts to connect salmon

farming areas to the decline statistically have failed. One has to wonder whether it is time to take a closer look.

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

Briefly yes. The problem with the continual growth of reporting is twofold. Firstly it is intended to quiet down those who call themselves conservationists in this debate. (Angling is not conservation and should be separated from it). It will not quiet them down. It will just localise the problem more.

Secondly it impacts on farming. The corporatisation of the salmon industry has occurred for a number of reasons but one of the most insidious has been the cost of keeping up with legislation for small companies. Further reporting will only exacerbate the problem.

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

No, it is overweening, cumbersome and too often duplicates. After the length of time the industry has existed there should be a root and branch review not of how to increase regulation but how to streamline and simplify it. The issues caused by the current regulation are the same as the last question.

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

I will be very surprised if it has any long term effect. The industry's reliance on France will be challenged but Scottish salmon is well regarded internationally and it is sold all over the world. The EU's ability to negotiate tariffs has been notoriously poor. If you take the case of South Africa as an example, where Scottish salmon faced a 25% duty whereas Norway faced none. The needs for our nation to negotiate our own relationships for our specific industries is paramount but will give us difficulty to start with.

7. My own comments:

The real issue that continues to drive these endless inquiries is the bad blood between the wild salmonid sector and salmon farming. It is time that this was properly addressed.

The organisations involved in salmonid angling have numerous disguises and cloak themselves in the righteousness of conservation. However what is and always has been clear is that you don't conserve a species by catching it on a hook. It would be the same argument to argue that deer are conserved by stalking. Of course the economics ensure that there is self interest to keep the species going but this is not altruistic conservation. It is the means to keep an industry solvent.

I have no argument with that industry. It is one I have loved since a boy. But it is an industry. It does not have righteousness on its side because it uses a wild species for its enjoyment.

I am a Trustee of a wild fish organisation and work with good people to try to ensure the best result for our area. There is debate and discussion and my views, expressed in this response, do not represent the views of the West Sutherland Fisheries Trust. However they will not be news to anyone in it. We have robust

discussion and disagreement about quite a few things not just salmon farming, which, in my view, is a sign of a good healthy organisation.

It is time that a proper cross industry group was set up, recognising that both are industries. All advocates should be excluded in order to find pragmatic solutions. All discussion needs to be based on evidence.

Another problem that bedevils this area is the imputation that Scotland's migratory salmonid fisheries are pristine and have not been affected until salmon farming arrived. It is time that there was a serious reality check on this. In our area, a little known fact is that the Sea Trout were imported in from Poland in the 1950's. Before that there were almost none. On this basis should we allow them to die out as they are a non-native species. Add to this one of our local rivers stocked Norwegian salmon in the 1920's. I do not wish to cloud the debate too much but where truth is being abused, a few facts tend to shine a little light.

Lastly the rules of evidence for this review need to be held to the light of day. People have made damning statements about the industry without having to justify them in any way. Such statements should be discounted unless there is supported scientific evidence to back them up.

There is one notable critic of our industry who has made himself unwelcome in several parts of the world. His criticisms have been reported and used by many reviews. However this critic also spent part of the 1990's trying to encourage salmon smokers to buy Alaskan salmon. As always with advocates one wonders where their money comes from. It would be useful to have a register of interests of those who wish to contribute to such inquiries. It need not be publicly available but would allow those tasked with the difficult job of trying to make decisions from such inquiries, a view of the interests of the person who makes the criticism. It would be terrible if Scotland made the same mistake as other salmon farming countries and discovered that major US Trusts were trying to shore up the reputation and price of the Alaskan salmon industry by demarketing the farmed salmon industry.

Nick Joy
April 2018