RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM NORTH MINCH SHELLFISH ASSOCIATION

I am responding on behalf of North Minch Shellfish Association (NMSA) which represents creel fishermen and divers who are based in Ullapool and the small communities fringing the Wester Ross MPA and who fish predominantly within that MPA.

There are currently three fish farm companies operating fish farms in the area. Wester Ross Fisheries has two sites close to Ullapool in Loch Broom and a third site in Little Loch Broom. Scottish Sea Farms has sites in the Summer Isles. Marine Harvest is currently investigating an application for a site in the Summer Isles and has other sites in Loch Ewe.

There is considerable local concern at present regarding applications to relocate sites in the Summer Isles and to increase the permitted biomass by approximately 217%. The potential application by Marine Harvest for a site in the Summer Isles is for a biomass of 2500 tonnes.

Responses to Questions:
Question 1. Members have a range of concerns about the current state of the Scottish farmed salmon industry. They are as follows:

Threats to inshore fishing areas
There has long been concern regarding the loss of highly productive fishing grounds to fish farms and that threat is growing as the industry seeks to expand its production by huge amounts. Currently we are seeing a large increase in applications for new farms and pre-application scoping including within Marine Protected Areas such as ours. It may be thought that fish farming takes up only a small area of sea but an important issues is that of the sites of the farms and the fact that they are in the inshore waters where creel fishermen and divers fish. Fish farms and their equipment are found in most of the small bays along the west coast, in the Western Isles and the Northern Isles. Apart from taking over productive fishing grounds they also take over sheltered waters potentially forcing smaller boats to fish in less safe waters.

The current applications being made by Scottish Sea Farms in the Summer Isles involve highly productive sea areas fished by the local creeling fleet and particularly the smaller, weather-constrained boats. At one site it is estimated that 30 fleets of creels would be displaced totalling 1200 creels. The other site would displace around 1000 creels. Finding alternative grounds would be immensely difficult and be at a financial cost to the fishermen in terms of fuel and potential days lost to bad weather due to fishing in more exposed fishing grounds.

To reach the production figures the salmon industry is talking about, the amount of sea area involved would be extreme and that is unacceptable to static gear fishermen and divers who supply a high quality market using sustainable fishing methods with minimal impact on the fishing grounds they fish. To an extent people are willing to accept current level of fish farming and the areas they occupy as they see a pay-off in local jobs and income in remote communities but they do not accept the expansion that is envisaged. The fishermen affected in the Summer Isles are completely opposed to the potential loss of their fishing grounds and have the support of other local creel fishermen who fish further out.

Chemicals
Members have concerns about the impact on the marine environment of the chemical treatments used by the salmon farming industry to combat lice and other diseases, and anti-fouling chemicals as well as the general depositing of faeces and excess food at current levels of production. These issues are raised at length in the SAMs report and in the report of the Environment, Climate Change and Land Reform Committee made to your committee in early March 2018 as well as by other highly knowledgeable and experienced individuals such as Dr Sally Campbell, Marine Ecologist and Board Member of the Scottish Creel Fishermens Federation.

We are highly concerned about the lack of knowledge and data about the impact of many of the chemicals currently used by the industry in the marine environment and in particular on marine organisms such as shellfish for which our members fish. Many of these chemicals have been shown to persist in the marine environment and to disperse into a far greater area of sea than was thought thus having a greater potential negative effect on shellfish populations. In addition there is a lack of understanding of changes in plankton communities brought about by fish farming and a potential for larger and more dangerous algal blooms from these chemicals and nutrient enrichment. There are worries about the apparent decline in scallop stocks in areas along the west coast and the possible connection to the use of neurotoxin pesticides by the fish farming industry. The use of these chemicals has increased considerably since around 2002. Should the envisaged increases take place in salmon production so will the use of these chemicals and the deposit of all the residues into the marine environment.

Along with the chemicals we are also concerned about the food fed to farmed salmon. People have long been worried about the use of wild fish to feed salmon and the use of chemicals to colour the flesh and now of other sources of food such as soya. They do not find the deposit of these residues into the marine environment acceptable.

Overall members do not accept that the regulatory regime is sufficiently robust to deal with environmental impact of both the chemicals and their use by fish farms. There is much anecdotal information about practices which are insufficiently regulated or policed. In general we are concerned that the precautionary principle is not being applied in relation to the salmon industry regarding chemicals and residues and that a huge increase in production as is envisaged, should not be allowed until these issues are addressed.

Cleaner fish/wrasse/lumpsuckers
The salmon industry has been turning to cleaner fish such as wrasse and lumpsuckers, as a more ecologically sound approach to dealing with the lice problem. Despite protestations that wild wrasse are being fished sustainably, there is evidence that there is a problem. Moreover there is currently no regulation in Scotland on wrasse fishing. It is also worrying that moves to regulate the situation are being undertaken by Loch Duart, a salmon farming company, working with Marine Scotland to set standards and fishery guidance. Wrasse also bring their own problems and diseases. We understand that those raised by fish farms do not have the same grazing habits so it is not a solution to supplying more wrasse and certainly not without a far improved understanding of the impacts on the marine environment and independently established regulation.

Other impacts on the marine environment
As people who work in the marine environment, inshore fishermen and divers are aware of and take notice of marine wildlife such as cetaceans, seals and sea birds. They take

pleasure in seeing wildlife during their working days and often video or photograph them as well as passing on information to local tourist boats. That interest is also growing in local communities. Again there is a conflict of interest with the salmon farming industry as the sites are generally near seal haul outs. One of the prospective sites mentioned above is close to a designated site for grey seals. Where acoustic deterrent devices are used to deter seals these may impact on cetaceans. We understand that their use is not being recorded and there are questions about their efficacy in deterring seals. The seas in our area and particularly around the Summer Isles are frequented by minke whales, dolphins and porpoises in summer as well as resident seals and again the prospective sites are in areas transited by them. A large number of juvenile dolphins and porpoises are seen in these waters as they clearly provide good feeding grounds. The opportunity to see these animals draws an increasing number of tourists to our area and provides an important source of income. Any negative impact is therefore a real threat to income as well as to the welfare of the creatures concerned.

Question 2
Given the concerns outlined above it is clear we do not believe that the sector should be allowed to grow in the future and certainly nowhere near that being advocated by the industry. It would be a far better strategy to aim to create a premium product not to aim for quantity. From both the general press and the fish farming press it is clear that there is a push to increase production globally by huge amounts. But at the same time it is acknowledged that the price is dropping – or 'normalising' as a Scottish Fish Farms executive said at a recent meeting regarding the push to increase production in the Summer Isles. Surely smaller production units would also reduce the levels of disease and lice infestations? There should also be greater effort to move sites out of inshore waters as well as to closed containment production.

Question 3
It is for the salmon farming industry to come up with better strategies than they are currently employing to deal with the challenges they are facing and such strategies should be put in place and shown to work before any increase is permitted. The approach advocated by the ECCLR Committee certainly provides a way forward.

Question 4
Again we would refer your Committee to the conclusions of the ECCLR Committee regarding data on the salmon industry that there are significant gaps in knowledge in all aspects of the salmon industry. The SAMs review paper came to similar conclusions. It has been extremely difficult to get figures on sea lice for example although it does appear that the industry may now be willing to put figures into the public domain. The salmon farming industry has the capacity to cause huge negative environmental impacts in our marine environment which many small scale businesses such as creel fishermen and divers as well as other marine users, depend for their livings. Such a deficit in information and potential outcomes is unacceptable.

Question 5
We do not believe that the current regulatory regime is sufficiently robust to manage the salmon fishing industry. There is insufficient monitoring of fish farms and the role played by SEPA needs to be looked at more closely. There is the example given of SEPA's approach by SCFF's response to the ECCLR Committee on moves to reduce permitted levels of EMB an anti lice treatment, where SEPA initially issued guidance that accepted residues be reduced considerably but subsequently it backed down, allowing a higher level. We rely on SEPA to police the industry and if it cannot be relied on for robust

independent action and policies then other independent bodies need to be set up. Again we agree with the ECCLR Committee's conclusion that Scotland's public bodies have a duty to protect our marine environment robustly which is not what is happening currently.

Overall conclusion

Creel boats make up 80% of the under 10m inshore fishing boats in Scotland. In addition there are commercial dive boats. The people involved, such as those represented by NMSA, play an important economic and social role in often remote communities. They supply a premium product marketed as coming from a pristine environment and fished for using sustainable methods respecting the marine environment in which they work. As they work in inshore waters the salmon farming industry has always impacted negatively on them as they are competing for the same waters. The value they derive from their activities comes back into their communities. Salmon farming, whilst it creates some jobs, often these are low paid and the financial returns in far greater part goes elsewhere and particularly overseas as many of the companies are foreign owned multinationals. Members do mostly accept the current level of salmon farming but they do not accept further loss of inshore waters nor do they accept the current use of chemicals and its potential impact on the marine environment. It is also very difficult for small communities to fight against expansion as the companies have far greater resources to push for it. The local executive admitted at a meeting with creel fishermen in the area to discuss the proposals to expand production that there would be winners and losers.

We would hope that your committee takes these concerns on board and sets out an approach based on the precautionary principle as well as an ecosystems-based approach so that the future development of the industry is better regulated with restricted impacts on the marine environment and that does not seek to dominate that environment as is currently its aim.

North Minch Shellfish Association
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