

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM NORTH WEST DISTRICT SALMON FISHERY BOARD

The North West District Salmon Fishery Board welcomes the opportunity to provide views to the Rural Economy and Connectivity Committee.

The Board is pleased to substantially endorse the report on the environmental impacts of salmon farming prepared by the ECCLR Committee.

In particular, the Board wishes to reiterate the conclusions identified in the covering letter to the report dated 5th March 2018 from Graeme Dey MSP to Edward Mountain MSP.

The status quo is not an option.

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

Like the ECCLR Committee the Board are *'deeply concerned that the development and growth of the sector is taking place without a full understanding of the environmental impacts'*.

Like the ECCLR Committee, the Board are not convinced *'the sector is being regulated sufficiently, or regulated sufficiently effectively'*

Both comments, above, are made particularly in relation to the protection of wild migratory fish, their migratory routes and the associated habitats and the actions of all the regulatory/licencing bodies serving or acting for Scottish Ministers or Local Authorities.

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?

The Board recognises that aquaculture is important to Scotland's economy. It must not be a source of shame. The development of the sector must be firmly grounded in the principles of sustainable development.

Like the ECCLR Committee the Board believes that salmon fish farms should be located away from salmonid migration routes. For the avoidance of doubt this should include the routes taken not only by salmon but also sea trout and at the various stages of their lives.

The greatest help the sector can be given by Ministers would be the motivation to change from the use of freshwater loch cages for smolt production and open sea cages for growing on salmon to closed containment of their farming operations.

The closed containment system is adaptable to other fish species too arguably enabling the aquaculture sector to diversify.

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?

The greatest help the sector can be given by Ministers would be the motivation to change from the use of freshwater loch cages for smolt production and open sea cages for growing on salmon to closed containment of their farming operations.

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

No. The Board believes that real time, farm by farm publication of data on sea lice, mortalities and disease should be a statutory requirement and should be published by the companies in question, rather than the SSPO. This is because not all salmon farms are members of the SSPO and such data should also be available for rainbow trout reared in the sea.

It would also emphasise that there is no need for a time lag in publishing such data. Marine Scotland licences for the control of seals require reporting within 48 hours and the Board sees no reason why the standard should be less than this.

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

It is not remotely robust. See the Boards comments above. The regulatory malaise affecting the farmed salmon industry emanates from every regulatory/licencing body and affects every part of the life cycle of wild salmon and sea trout in freshwater and at sea.

There is no technological need for a first-class aquaculture industry to interact with wild fisheries and their habitats. There is no technological barrier to the prevention of sea-lice infestations, of the escape of farmed fish, of inter breeding with wild fish or the deterioration of their habitats. There should be no tolerance of it.

By genetic sampling Marine Scotland Science showed only recently that escaped salmon captured in Loch Shin originated from both of the freshwater smolt farms operating in the loch. Loch Shin, via River Shin, flows in to the River Oykel Special Area of Conservation for salmon etc. The water quality of Loch Shin is also changing for the worse due to the additional nutrients (principally phosphate) being added to it by fish food over a prolonged period.

A planning application for the removal of a 10 year time limit to continue the operation of one of the smolt units in Loch Shin indefinitely is under consideration by the Highland Council (18/01202/S42).

The status quo is not an option

North West District Salmon Fishery Board
April 2018