

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM PERTH AND DISTRICT ANGLERS ASSOCIATION**

The Officers, Committee and members of Perth and District Anglers Association (PDAA) would like to thank the Rural Economy and Connectivity (REC) Committee for the opportunity to submit written evidence to its inquiry into salmon farming in Scotland.

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

PDAA has been following the growth of the farmed salmon industry for many years and is well aware of the financial benefit and jobs it brings to the Scottish economy and the planned growth for the industry over the next few years. However, it is also apparent that below the thin veneer of success, the industry is suffering from overwhelming parasite and disease problems which not only threaten the industry itself but also the marine environment of Scotland.

The mortalities suffered by salmon farms makes uncomfortable reading – some 25% of production is lost due to disease and parasites, a figure which is not only unsustainable but would not be tolerated in other sectors such as agriculture. The levels of mortality indicate that husbandry is nowhere near the required standards and/or the available treatments are ineffectual. The proliferation of sea lice and various diseases must also affect the waters and sea bed outside of the open cages and there is evidence suggesting very negative effects on populations of Atlantic Salmon and sea trout – the icons of Scottish rivers and of course of great interest to salmon and sea-trout anglers.

#### **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?**

The ongoing, and increasing, problems of sea lice, disease, seal damage and escapees associated with open net salmon farming mean that any growth of the industry along the line of the past few years cannot be allowed. The Environment, Climate Change and Land Reform (ECCLR) Committee report on the Environmental Impacts of Salmon Farming concluded (amongst others) that:

- Scotland is at a critical point in considering how salmon farming develops in a sustainable way in relation to the environment. The planned expansion of the industry over the next 10-15 years will place huge pressures on the environment. **Industry growth targets of 300,000 - 400,000 tonnes by 2030 do not take into account the capacity of the environment to farm that quantity of salmon. If the current issues are not addressed this expansion will be unsustainable and may cause irrecoverable damage to the environment.**

Such a conclusion cannot be ignored and before any positive way forward is researched and brought into being, there must be a complete moratorium on any further open cage salmon farming expansion whether by new farms or expansion of existing farms. In parallel, there should be encouragement to re-locate any existing farms which could in any way affect migrating wild fish.

The evidence of the effects of sea lice and chemicals point to closed containment as the only sensible way forward for the industry. Closed containment would provide complete biological separation between farmed and wild fish, control over the environment of the farmed fish by eliminating transfer of disease and parasites and eliminating escapes. Closed containers could be sited on land close to the sea or at sea, with a land-based option attractive to the operators in terms of accessibility and safety. Waste from the tanks would also be recycled as fertiliser and not simply allowed to drift to the sea bed as happens now.

A cost benefit analysis between closed containment and the status quo will be a necessary exercise and, initially, a government subsidy to change over to closed containment may be required. But with traditional Scottish ingenuity applied by the engineering and manufacturing industry, the benefits to the overall Scottish economy could be very significant. The market place for “at sea” and land-based container designs and hardware is not just Scotland but worldwide. Norway leads the world currently in this area – Scotland should not let that continue.

### **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?**

For the medium to long term closed containment is the answer.

For now, it is clear that the industry is not managing the health issues and, during the transition to closed containment, open cage farming needs strict regulation to improve production rates and, as important, to control the impact on wild fish and the wider Scottish environment. The ECCLR Committee findings that “the same set of concerns regarding the environmental impact of salmon farming exist now as in 2002 but the scale and impact of these has expanded .....there has been a lack of progress in tackling many of the key issues previously identified and unacceptable levels of mortality persist” indicate that the regulatory approach of the Government agencies has been nothing short of lamentable. This must change and change fast.

From a wild fish point of view (an area of particular concern to PDAA), there needs to be a strengthening of Scottish legislative and regulatory control of fish farms to protect Scotland’s Atlantic salmon and sea trout. The ECCLR Committee recognised that “that there appears to be no locus in the agencies for the protection and health of wild fish....The Committee is firmly of the view there should be a competent regulatory body charged with the protection and health of wild salmon and trout.”

“The Committee considers the current regulatory process does not give sufficient consideration to the impact of salmon farming on wild salmonids. There should be a formal requirement for pre-application and post-consent monitoring of wild fish.”

“The Committee considers that an agency should be charged with the health and welfare of wild salmon and trout.”

How this could be achieved will almost certainly be the subject of some debate but as a matter of urgency a Government agency needs to be either appointed or come forward as the champion of wild fish and ensure that the salmon farming industry and regulators take due regard of potential environmental impacts on our wild fish.

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

Absolutely not! The current approach of salmon farms “self-reporting” on a voluntary basis must stop and be replaced by mandatory reporting from independent investigations and monitoring, with frequent unannounced visits by the regulators.

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

The current regime appears to be broken. It is disjointed, insufficient, lacking leadership and blinded by the apparent success of the industry. The regulatory regime must face the reality of where salmon farming is. It needs to be quickly repaired and must include protection for the environment in general and wild salmon and sea trout in particular.

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

PDAA holds no political views but common sense would say that applicable EU laws should be the solid foundation when transitioning those laws into new Scottish laws after Brexit.

One example of this is the need to use the precautionary principle when laying down the strategy for the future shape of the salmon farming industry. The ECCLR Committee made several references to this in its report:

“There appears to have been too little focus on the application of the precautionary principle in the development and expansion of the sector”.

“The Committee is supportive of aquaculture, but further development and expansion must be on the basis of a precautionary approach....”

A further example of where EU law must be the foundation of new Scottish law is the “polluter pays” principle. Salmon farming has, for years, ignored the costs of its impact on the environment. It must be unique in this regard and, of course, has had a massive financial benefit because of this. The ECCLR Committee report has recognised this fact by stating “This would not be acceptable in any other sector and the Committee questions why this has been allowed to happen in the development and expansion of the salmon farming industry”.

The precautionary principle and “polluter pays” must be fundamental parts of the future salmon farming industry as it transitions to closed containment. They will be the foundation of a sustainable industry which benefits Scotland’s economy and, as important, Scotland’s environment, including our wild Atlantic salmon and sea trout.

Perth and District Anglers Association  
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