

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM RIVER CREE DISTRICT SALMON FISHERY BOARD

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

We recognise that the farmed salmon industry in Scotland has been an undoubted commercial success for those companies involved in it. It has also brought economic benefits to many communities on the west coast of Scotland. However, those benefits have not extended to all communities on the west coast. Presently, there are no salmon farms on the Solway coast, but it is clear that the presence of salmon farms elsewhere is having an adverse effect on salmon fisheries in the Cree District. There can now be no doubt that west coast salmon rivers (including those on the Solway) are suffering a reduction in salmon numbers as compared with east coast salmon rivers. It is idle to suggest that this has nothing to do with the presence of salmon farms on the west coast. This aspect of the matter is considered in more detail below.

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?

We are of the opinion that any expansion of the salmon farming industry would be entirely premature until the environmental impacts mentioned below are addressed. We can do no better than to repeat the comments of the ECCLR Committee report on the environmental impacts of salmon farming dated 5th March 2018,

“...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.**”

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?

We take issue with the statement “is currently managing”. It would be more accurate to say that the industry is failing to manage such challenges. As mentioned in the ECCLR Committee report, these include the following:-

- There are unacceptable levels of mortality in farmed salmon
- The industry has failed to prevent a general increase in sea lice numbers
- Pollution from open cages is inevitable
- Escapes of farmed salmon continue

We are of the opinion that any sustainable development of the industry should incorporate the following safeguards:-

- There should be no consents for new or expanded salmon farms within 30km of the mouth of any migratory salmonid river
- Any expansion should be in offshore and deep-water locations
- Any newly-consented fish farm should be subject to a condition that it will be fallowed in the second year of production (when sea lice numbers likely to be at their highest) and in each year during the wild smolt migration period
- Whilst it appears that RAS systems may not be financially viable at the present stage of development, incentives should be offered to the industry with a view to trialling such systems leading hopefully to their universal adoption. If it is accepted that “the status quo is not an option” (which we do) then it seems to us that there is an overwhelming argument that land-based RAS or sea-based closed-containment systems are the way forward for the salmon farming industry.

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

As the ECCLR Committee report has identified, there are significant gaps in knowledge, data and monitoring of salmon farms. In particular, the Scottish Government targets for sea lice numbers are not scientifically justifiable.

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

Again, the ECCLR Committee report has identified that the role, responsibilities and interaction of agencies requires review. Further proof, if it was required, was provided by evidence given to your committee on the 18th April by representatives of SEPA and SNH. Representatives of each organisation had to admit that they simply did not know whether the present regulatory framework was capable of protecting the environment. Enough said.

Question 6

We have no comments on how the UK’s departure from the EU might impact on the farmed salmon sector.

River Cree District Salmon Fishery Board
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