

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM RIVER GIRVAN DISTRICT SALMON FISHERY BOARD

The River Girvan District Salmon Fishery Board commends the review of salmon farming in Scotland and welcomes the opportunity to submit a response to this consultation. The Girvan Board hopes that both Parliament and the Government pay heed to the responses to the consultation.

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

The Girvan Board is supportive of sustainable development particularly in rural Scotland. The salmon farming industry has been a success and has undoubtedly brought a degree of economic prosperity and social benefits to some of the more remote parts of the country. However, there must be a very real question mark over the industry's environmental performance and hence a question over the industry's sustainability.

Salmon farming is challenged by pests and diseases and emits chemicals and waste products in to the marine environment. This impacts on the crop, on the wild salmon population, on the wider marine environment and through migrating fish on the freshwater environment. These environmental impacts are overwhelmingly negative and must be addressed and mitigated before the industry can be considered sustainable.

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 industry should develop a standard for sustainability against which each individual operation should be monitored. This standard should be agreed through a consensus approach by all stakeholders in the industry including environmental NGOs. The performance of every farm should be the subject of individual independent scrutiny against such a standard.

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?

The environmental challenges faced by the industry, whether pests and diseases or by-products and waste should be the nub of this review. Unless these are addressed any marketing advantage that the product might have from a "clean and green" perspective will be lost and ultimately the damage to the aquatic environment irreparable. These issues could be addressed through a process such as briefly described in our response to question 2. Regrettably the Girvan Board can offer no technical fixes which might be helpful, but would ask for a moratorium on development of more farms until the challenges are successfully addressed.

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

No, is what the Girvan Board feels in direct answer to this question. Sound policy and practice derives from sound data collection, monitoring and reporting. The REC Committee should seek clarity on this issue not simply on whether the data collected is adequate, but whether the uses to which the data are put are appropriate. (Given the image the industry wishes to portray the Board would question whether “adequate” is good enough. Should we not want a successful industry actually to have good data collection and monitoring?)

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

The regulatory regime does not appear sufficiently robust. The Board does not feel competent to comment on whether this a function of the regulations themselves or whether it is a function of their application.

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

No

River Girvan District Salmon Fishery Board
April 2018