

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM SCOTTISH ASSOCIATION FOR COUNTRY SPORTS, WILD FISHERIES EXPERT GROUP**

##### **Introduction**

The Scottish Association for Country Sports (SACS) is the largest fieldsports advocacy body in Scotland. A membership organisation run by members, for members, we represent, protect and promote the interests of our subscribed members and the wider fieldsports community. The SACS Wild Fisheries Expert Group (WFEG) was established to focus specifically on representing the views and needs of our angling members, and comprises both SACS volunteers and staff who possess suitable competence in wild fisheries management.

Due to its remit, the SACS WFEG considers that it has set out its primary concerns about salmon farming in its submission to the ECCLR Committee's call for evidence into the environmental impacts of salmon farming; we reiterate our views below for the REC Committee's Inquiry.

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

The available evidence indicates strongly that the industry is currently fundamentally unsustainable. The true cost of salmon farming in Scottish waters is not correctly accounted for; as we stated in our response to the ECCLR Committee's call for evidence, the environment bears the real cost of sea lice, disease, waste, eutrophication, diffuse and point source pollution, escapes, and natural resource inputs. The salmon farming industry is currently subsidised by the environment, which is effectively the industry's creditor; the debt continues to increase and accumulate as the sector continues to operate unsustainably, and there appears to be no exit or management strategy that will see the debt repaid.

While we recognise the importance of rural employment opportunities, particularly in the Highlands and Islands, it is insupportable to place economic gain ahead of competent environmental stewardship, not least because natural resources underpin these jobs; the sector's unsustainable practices are undermining its own future. Further, the blinkered focus on commercial salmon meat production has marginalised other legitimate economic contributors such as the recreational angling sector, which – in contrast to aquaculture – is of fundamental importance to Scottish culture and heritage.

##### **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?**

It is a fallacy to assume that growth can be achieved without environmental impact. As we have stated many times before, economic growth is fundamentally unsustainable where it relies on the increasing exploitation of already compromised natural resources. It concerns us that all references to the future of Scottish salmon farming assume growth as though this is inevitable and outwith the Government's control, when this is not the case. The salmon farming industry requires root and branch reform just to mitigate its current environmental impacts, and it would be irresponsible of Government to support industry growth at the current time. There is significant evidence that expansion under the industry's existing model would continue to cause cumulative, catastrophic damage to our environment. If an accurate quantum was applied to the environmental services that are currently taken ostensibly 'for free' by the salmon farming industry, it is our belief that the production of farmed salmon meat under the current system would not be considered commercially viable.

We agree with other stakeholders that the industry should move towards domination by RAS, or closed containment systems, and that this should be facilitated and incentivised in Scotland. Rather than try to support an essentially failed system (current net-pen farming), the Scottish Government should focus on investment in closed containment technology.

### **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 industry's attempts at improving fish health are not adequate based on the evidence available. It appears to us that the industry has yet to accept responsibility for the health of all salmon affected by its practices, which clearly includes wild salmon as well as farmed fish. It is also clear that the extent of the problems framed by this call for evidence as 'challenges' has not been fully quantified or mapped; this is evident from the research gaps identified in the ECCLR Committee's aquaculture work.

Until the industry can remove its operations from the open water environment into closed containment, which appears to be the only environmentally viable way of addressing its 'challenges', there should be a moratorium on new farms, and prioritised research to address the knowledge gaps. This should occur in parallel with Government incentivisation into RAS development.

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

Given the well-documented lack of transparency to date from the industry, extensive and significant research gaps particularly regarding environmental impacts, and the discrepancies within sea lice management, the only possible answer to this question is 'no'. It is a poor reflection on both the industry and the Scottish Government that

an activity with such far-reaching negative effects has been allowed to develop to its current size and extent with relative impunity under the cloak of inadequate data collection. The range, availability and quality of data must be addressed as a priority.

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

Regulation of the industry is inconsistent, inadequate, opaque and poor overall. We believe that the regulation of sea lice in particular is far from exemplary, being currently openly subjective and without scientific basis. This position is insupportable, and we do not believe that enforcement action is proportionate to the impacts caused by salmon farm mismanagement; wild salmon and sea trout are bearing the true costs of regulatory inadequacy and industry arrogance.

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

Leaving the EU presents an opportunity to ensure that legislation is targeted for Scottish issues, particularly the protection of our wild salmon stocks. We understand from the Cabinet Secretary for the Environment, Climate Change and Land Reform that it is the intention to retain current EU standards for environmental management, but it is not yet clear what impact Westminster will have on this intention and whether this unique opportunity to better protect our environment will be wasted or capitalised.

The outcome of trade negotiations may be a defining impact given the current extent of farmed salmon meat exports from Scotland to the EU; reduced demand from the Continent would surely cause the industry to rethink its business model.

In this context and bearing in mind the established economic significance of recreational fishing for wild salmon in Scotland (see the January 2018 SAMS report to the Scottish Government on the environmental impacts of salmon farming), we believe that the post-Brexit priority must be protection of the environment and prioritisation of comparatively low-impact economic activities such as angling and related tourism. The Scottish Government must remove its blinkers about salmon farming, and take a holistic view of our country's economic and environmental future.

Scottish Association for Country Sports, Wild Fisheries Expert Group  
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