

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM SCOTTISH SALMON PRODUCERS' ORGANISATION**

Scottish Salmon Producers Organisation (SSPO) represents the Scottish salmon farming industry. Our membership accounts for over 90% of the salmon produced in Scotland. Compliance with the *Code of Good Practice for Scottish Finfish Aquaculture* (CoGP) is a prerequisite of membership of the SSPO.

Scottish salmon production is a success story in Scotland. Farmed Atlantic salmon is Scotland's and the UK's largest food export. The industry is one of Scotland's most important rural sectors, worth over £600m in export value to Scotland in 2017 and supporting 10,340 jobs. Earnings arising from these jobs amount to £270m per annum. We are a significant source of sustainable local employment.

Scottish salmon production in 2016 was 162,817 tonnes according to Scottish Government official statistics. Long term industry confidence is evident in the continued level of company investment in people, skills training research and technology. Capital investment has remained steady at around £63m over the past two years.

Consumer demand for high quality Scottish salmon continues to grow in domestic and overseas markets. Salmon is the most popular fish in the UK shopping basket. Its full traceability, provenance and production standards ensure that it commands a premium in many high value international markets.

Scottish salmon production currently represents around 7% of global production. The industry has an aspiration to grow to meet increasing demand but remains resolute that any future growth will be steady and sustainable. The current consenting regime for Scottish aquaculture, including the planning system and other regulatory frameworks relevant to environmental protection, will be the over-riding factor that determines sustainable growth into the future. The industry acknowledges that it must overcome production challenges and minimise wider impacts in order to capitalise on the opportunity of further sustainable development in the rural economy.

There are a range of actions which will help the industry to grow and in doing so will contribute to further economic growth locally and nationally.

#### **Fish Health is fundamental to the continued success of the salmon sector**

All farmers work to the independently audited CoGP which addresses around 500 compliance points covering all aspects of salmon farming and primary processing. Audits and fish health inspections are carried out almost every day of the year by Scottish Government Fish Health Inspectors, retailers, RSPCA, CoGP, and other quality assurance schemes. Daily fish health checks are carried out on every single farm in Scotland by fish farmers. The combination of professional health checks and

audited schemes means that the standard of fish husbandry on Scottish farms is very good and independently monitored.

Antibiotic use in salmon farming is extremely low, due mainly to the development of vaccines and fish health management practices.

A Farmed Fish Health Framework is being developed by industry in partnership with the Scottish Government and is supported by all salmon farming companies operating in Scotland. It will set out a strategic framework of high level fish health objectives for the next 10 years to underpin the sustainable growth of Scottish aquaculture, of which 90% is salmon farming.

From its pioneering days in the 1970s, the industry has used science to shape its development and continuously adapts to embrace best practice for production efficiency, fish health and welfare and responsible farming. Challenges are arising from the marine environment, with documented increases in water temperature and associated occurrences of jellyfish and algal blooms. These factors can adversely affect salmon welfare. New problems like gill diseases have emerged and require management alongside the management of naturally occurring sea lice. Mortality levels in Scottish farms have risen since 2011 because of Amoebic Gill Disease (AGD). Farmers have developed good husbandry techniques for controlling the problem, but it recurs, and with it more complex gill health problems have developed. Data on salmon production and mortalities are published by SEPA and Marine Scotland. This reporting shows that the levels are highly variable year to year, which points to a range of underlying causes.

Sea lice occur naturally on wild and farmed fish. They are managed in a number of ways including the use of cleaner fish, which swim with the salmon and eat the sea lice; single year class production; fallowing farms; machines to remove the lice and medicines which are prescribed by vets. Significant progress has been made in reducing the use of veterinary medicines to manage sea lice by cleaner fish and other techniques.

Priorities for the salmon farming sector include:

- Continuing analysis of the factors affecting mortalities and the development of an action plan to tackle underlying causes.
- Better understanding of the causes, impacts and mitigations of gill health disease.
- A shift towards alternative measures rather than medicinal interventions. The industry will further develop best practice for the use of cleaner fish on farms, in the use of equipment such as thermolicers and hydrolicers and techniques such as fresh water bathing.
- A review of current Area Management Agreements incorporating changes to improve performance including fallowing, stocking and treatment synchronicity as sea lice and disease management tools.
- Using the latest modelling expertise and working with regulators to understand how to reduce farm connectivity, position farms in the most appropriate places to ensure the best possible fish health and ensure minimal impact of salmon farms on the environment.

- A reduction in the requirement to use wild caught wrasse through increased focus on hatchery reared cleaner fish. Currently more than 70% of all cleaner fish used is hatchery reared.
- Alignment of resources required to support revised strategic research priorities to improve fish health and welfare.
- Industry publication of site by site mortality and sea lice reports together with information on the management strategies in place for both.

**Salmon depend on a high-quality environment – salmon farmers are stewards of that environment.**

The ECCLR Committee Report was critical of aspects of salmon farming operations and the regulatory oversight of these issues and impacts. While accepting that overall industry performance in some areas needs to improve and that recent large-scale fish mortality events presents very difficult challenges, we would wish to highlight the good progress made:

- The industry has developed its reporting (which has been in place since 2010) to produce site by site reports indicating mortalities and sea lice alongside relevant information on the management strategies in place for both.
- Compliance with environmental consents issued by SEPA is good. Over 85% of our operations are categorised as Excellent or Good, and remedial measures are pursued on farm sites which dip below this high standard
- Predator attack by seals must be managed to protect farmed salmon. The number of seals shot under licence continues to fall for the 6<sup>th</sup> consecutive year and the industry remains committed to reaching its target of zero.
- The environmental impact of use of licensed veterinary medicines is appraised through the licensing process. Their use and discharge are strictly controlled by SEPA, through CAR licences. This framework incorporates an Environmental Quality Standard (EQS)-based approach to regulation, which is supported through European legislation, and includes high safety margins.
- We agree with the findings of the SAMS report, that the potential impacts of sea lice are just one of a multitude of factors that might impact wild salmonid populations. Any potential impacts on wild fish are not well understood and the science is particularly lacking for Scotland.
- In 2017 Marine Scotland introduced new regulatory measures relating to sea lice control, implemented under the Aquaculture and Fisheries Act (2007). These measures should be given sufficient time to allow any targeted improvements in lice levels to be realised.
- Salmon farming has been involved in numerous local and national engagement activities with the wild fisheries sector and has supported research to better understand the science. SSPO currently co-sponsor a SARF project (SARFSP010) studying return rates of smolts with a view to better understanding the impact of sea lice. We expect significant further research will be needed.
- More open publication of wild fisheries data would enhance understanding and analysis of the position and help move the debate forward.
- The industry supports the position presented in the SAMS report, that the survival of escapes is low; however, Scottish salmon farming is committed to reducing the number of escaped fish.

- We also support the view that much of the science surrounding the potential for genetic introgression and its potential impact, refers mainly to Norwegian studies which are not directly comparable to the Scottish context. The Scottish situation is highly complex, and further confused by the fact that in the early 1970s and 1980s, mutual agreements between farmers and fisheries proprietors promoted the stocking of farmed salmon into various river systems.
- The development of the Scottish Technical Standard (STS), by both the salmon farming industry and regulatory authorities (within the Ministerial Group for Sustainable Aquaculture) is key to minimising escaped fish.
- Specific training in containment is being delivered to support the uptake of the STS.

### **Salmon farming underpins local economies and supports local community projects**

Salmon farming has transformed the Scottish food sector and the rural communities of the west Highlands and Islands and Argyll & Bute with jobs, investment and business opportunities. Families are now able to live and work in the communities where they were brought up. Salmon farming companies list nearly 2,500 companies in the Highlands and Islands area they do business with. Last year, salmon farming donated £735,000 to local sports and community groups.

The industry offers modern apprenticeships, training, and career opportunities and second generations of families are joining the sector. From engineers to fish health managers, from marketing to vets, the range of jobs in salmon farming is impressive. But to capitalise on these opportunities the Highlands and Islands must improve its transport and digital connectivity. International business emanates from these remote areas, so they need high quality systems to communicate and deliver high quality salmon.

### **Brexit implications**

As we approach Brexit, we seek frictionless, tariff free and uninterrupted trade with our European partners during the transition period and after the UK exits the EU. If the UK is not able to secure a trade deal with the EU, that would result in a tariff of 13% being applied to smoked salmon products and a 2% tariff on fresh salmon exports to a major trading bloc. In any future trade agreement with the EU it is essential that UK immigration policy reflects the need to safeguard current EU nationals in our industry and continues to allow recruitment of the people and skills we need.

Scottish Salmon Producers' Organisation  
April 2018