

## **RURAL ECONOMY AND CONNECTIVITY COMMITTEE**

### **SALMON FARMING IN SCOTLAND**

#### **SUBMISSION FROM THE SCOTTISH SEA ANGLING CONSERVATION NETWORK (SSACN)**

##### **Q1. Do you have any general views on the current state of the farmed salmon industry in Scotland?**

As anglers we are all too aware of the issues that the Salmon aquaculture industry creates in the West of Scotland .... many of the sea lochs that anglers fish are affected by this damaging practices.

There is a huge lack of evidence which shows that the marine salmon aquaculture industry in Scotland is an industry which is under-regulated.

The expansion of this sector, on the scale proposed simply cannot be delivered in an ecologically sustainable way.

The report commissioned by ECCLR is damning of the industry ... the committee should push for hard with this for sustainable change.

The economic impact on these fisheries of the under-regulated aquaculture sector has not been adequately taken into account in marine policy and it MUST be. Much of the profit in this sector not remaining in Scotland.

##### **Q2. 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?**

Any growth in the sector MUST be sustainable rather than profit and jobs based. Whilst we understand the importance of jobs to fragile local communities we believe that there are other ways to create and maintain jobs ..... Sae angling alone brings in excess of £140 million per annum (See the Radford report commissioned by the Scottish Government). Supporting marine recreation would bring much more value to the Scottish economy than the expansion of the industry.

There is also many issues relating to the practice that sound science should be allowed to look at and evaluate the impact and sustainability of the existing extent of open pen farms. Such independent assessment must be carried out before any thought of increasing could take place.

##### **Q3. 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?**

As we see it common sense should dictate that the industry changes from open cage to closed containment .... What's holding this back is a determination by those in power to make the sensible ecological change. Much of the industry is owned by foreign companies ... many based in Norway and taking much of the profits out of Scotland. The Norwegians don't even allow some of these practices in their own country should tell us something.

**Q4. Do you feel that the current national collection of data on salmon operations and fish health and related matters is adequate?**

SSACN welcome the ECCLR report to you, and agree with the Convener's letter where it states that: "*There are significant gaps in knowledge, data, monitoring and research around the adverse risk the sector poses to ecosystem functions, their resilience and the supply of ecosystem services. Further information is necessary in order to set realistic targets for the industry that fall within environmental limits. There should be a requirement for the industry to fund the independent and independently verified research and development needed.*"

Sound independent science is required to assess the current system before any consideration is made on expansion.

**Q5. Do you have any views on whether the regulatory regime which applies to the farmed salmon industry is sufficiently robust?**

SSACN agrees with the ECCLR Convener's letter to you where it states: "*The current consenting and regulatory framework, including the approach to sanctions and enforcement, is inadequate to address the environmental issues. The Committee is not convinced the sector is being regulated sufficiently, or regulated sufficiently effectively. This needs to be addressed urgently because further expansion must be on an environmentally sustainable basis.*"

More specifically, the sector is inadequately regulated with regard to location, cumulative impact of multiple salmon farms, general ecosystem impacts, impacts on other industries and reporting obligations.

SSACN urge that a timetable is put in place to for a full change to close containment in the sector. Although there would be cost implications for such a development, it would eliminate many of the environmental impacts and detriments to other sectors which open cage operation leads to. As ECCLR note: "*The industry needs to take full responsibility for all environmental costs of production. 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.*"

**Q6. Do you have any comments on how the UK's departure from the European Union might impact on the farmed salmon sector?**

No one knows how this will affect trade from any sector let alone the farmed Salmon industry. It would be easy for the EU to restrict the import of Scottish farmed Salmon ... the ECCLR report notes this ..... surely it is time to clean up the industry through independent science and regulation and enforce a change to closed containment for the better of Scotland and its own wonderful natural resources and not leave it as a scene for the commercial sector pillage and destroy - which will result in an ecological disaster which would be followed by an economic one when the quality etc. issues are used against it from the EU?

The Scottish Sea Angling Conservation Network (SSACN)  
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