

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM SKYE COMMUNITIES FOR NATURAL HERITAGE (a group of circa 50 people from the Trotternish peninsula on Skye)

The answers given are our opinions and are based on our experiences here living on the Isle of Skye:

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

The aquaculture industry is now operating over 300 open net farms along the west coast of Scotland. They are being allowed to expand, operating larger and new farms, yet the cumulative effect of the pollution, impact on wild fish stocks, sea bed life, cetaceans etc. is not given sufficient recognition or protection. The companies are allowed to pollute and don't even pay for the privilege. Scotland's authorities are failing to apply the Precautionary Principle, a legal obligation, and so permitting significant degradation of its environment.

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?

Move to closed containment, recirculating aquaculture systems (RAS), maintaining jobs, supply chains and avoiding widespread pollution and reduction in biodiversity. As French President Macron stated, "there is no Planet B." Scotland should protect its valuable natural heritage, a key asset and its Scottish salmon premium brand from becoming tainted by short-term profiteering.

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?

Sea lice are out of control. Mortalities from disease and farm mismanagement are rife. The current open net systems are cheap but fundamentally flawed so significant change is essential, to move to land-based RAS - as is happening in other countries.

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

No. It is an industry 'marking its own homework' and the regulation is woefully inadequate and appears disinterested in carrying out its duties.

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

No, it is pathetically weak, disjointed, almost non-existent. SEPA are toothless, SNH woefully weak and the (Highland) Council's so-called 'environmental management plans' are the equivalent of upgrading your cabin on the Titanic; the ship is still going down. It is almost as though they have been tasked with 'making it happen' for aquaculture rather than carrying out their duties.

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

No.

7. Other areas of particular interest to you or your organisation that are relevant to the Committee's inquiry.

Here on the Isle of Skye, it is not jobs that are needed but housing. However, with the RAS approach, jobs will be retained and even increased, both locally and in the supply chain.

Portree reports 0.7% unemployment in the summer and a peak of only 1.2% in the winter, around $\frac{1}{3}$ and $\frac{2}{3}$ of the national average respectively. There are many shortages of both skilled and unskilled workers, from health staff, through lorry drivers, tradesmen to services people etc. Getting staff is the main challenge for businesses here. Any people who manage to find a property and move here often start up a sole trader business and have a full order book very quickly. We can see that the 'fragile economy' label is out of date and that Skye is buoyant and has been so now for several years.

In our experience, The Highland Council are in 'ostrich mode,' burying their heads in the sand and continuing to approve new open net farms while a growing body of compelling evidence on environmental damage is published, independently reviewed and excellently reported on by the ECCLR Committee. The Planning Department appear to be very pro-aquaculture and are not balanced in their assessments and presentations of planning applications and planning councillors appear unaware of the environmental damage or the RAS alternative. This means that planning applications for open net fish farms are approved without any robust challenge as to the consequences.

If the Scottish Parliament and its MSPs really care about Scotland's long-term prosperity, it will stop this 'rape and pillage' of its west coast seas and sea life soon, following many other countries in outlawing such damaging practise, protect its waters and salmon brand. The future is in such wildlife and landscape experiences and premium food brands, not a race to the bottom to be the lowest cost, most polluting producer. Scotland needs to lead, not lag behind. It is crucial that the REC Committee recognise this in their review.

Ian Dobb, on behalf of Skye Communities for Natural Heritage
April 2018