

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM THE SUSTAINABLE INSHORE FISHERIES TRUST

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

The evidence, or lack of it, provided to both Committees, demonstrates that marine salmon aquaculture in Scotland is an industry which is under-regulated, externalises its costs to other economic activities (as per the comments by Luxmoore and Linley-Adams at your 14th March session), and appears to have successfully captured policy-making at the expense of other sectors.

The expansion of Scotland's aquaculture sector, especially on the scale proposed by industry, cannot be delivered in an economically or ecologically sustainable manner without changing both regulation and the planning/licensing regime, all based on better data.

SIFT recognises the rationale for separating the ecological and economic impacts of aquaculture, but, as stated in our submission to ECCLR, notes the intimate interaction between the two. Economically successful exploitation of Scotland's inshore waters for the long term requires a diverse marine ecosystem with resilient populations of a wide range of wild target species. To achieve this aim, better data is needed. Currently, there is insufficient data and, in its absence, insufficient application of the precautionary principle. ECCLR's report (para. 55) recommends that, with regard to sea lice, "*the industry should play a full part in funding that research*" - SIFT recommends this principle be applied, with industry being required to fully fund research on all impacts and mitigation strategies, with research questions and methodology not designed by industry.

To illustrate the problem, the SRSL report commissioned by ECCLR considers the impact of biocides on "non-target species", including crustaceans (as discussed, for example, in para. 152 of ECCLR's report to REC). These are often the targets for important wild capture commercial fisheries, or are consumed by these target species. The economic impact on these fisheries of the under-regulated aquaculture sector has not been adequately taken into account in marine policy.

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?

Growth in the industry, and indeed maintaining it at its current size, requires more rigorous regulation to ensure its costs are not borne by other sectors to the longer term detriment of the Scottish economy. Unless such change is made, the sector will be unsustainable in the long term and its growth will be impaired.

Currently the scale, location, licensing and management of marine fish farms in Scottish waters are not in full accordance with best international standards. As a result, the industry runs the risk of losing market share as its products are outcompeted on grounds of quality. The bulk of the problems arise because of the

use of open cage salmon farming, which allow the dispersion of chemical treatments (notably emamectin benzoate), lice, and large volumes of faeces into the wider environment. Crucially, the industry's low standards also negatively affect other sectors, notably commercial wild capture fisheries and recreational angling.

At your 14th March meeting, in response to a question from John Scott MSP, witnesses raised the Norwegian practices of substantial licence discounts for closed containment and the prohibition on open cage farming in freshwater lochs. These sorts of measure should be adopted in Scotland in order to incentivise performance improvement and ensure that the industry remains competitive in international markets, where demand is driven by sustainability.

Our view is that a "traffic light" system should be introduced on site licencing and regulation. Sites should be graded as follows:

- Green: sites which can operate under an already agreed management regime, i.e. at least as low impact as current Recirculating Aquaculture Systems (RAS)/Closed Containment (CC);
- Orange: sites which can remain operational within stricter limits or with identified management changes; and
- Red; sites which should be closed because of their impact on other fisheries, the ecosystems which support them or on protected marine features.

APB authorisations are currently issued on an indefinite basis (are Planning consents). SIFT recommends that salmon farm authorisations should be issued for defined periods, subject to regular review.

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?

Farmed salmon fish health and environmental issues are of interest to SIFT primarily for their impact on fish and crustacean health in the marine environment. We believe that as a priority, the following actions should be taken:

- A full transition to Recirculating Aquaculture Systems/Closed Containment. As long as open cage fish farms operate, they will be inherently porous. Guy Linley-Adams told your 14th March meeting the following: "*If we think of the farm as a black box, as long as what is within that black box is contained...*". everything that is contained (whether chemicals, cleaner fish, faeces, or salmon themselves) will not be a risk to the wider environment.
- Until RAS/CC has been adopted, there should be proper scientific examination of all flows from farms, and transparency about how permissible levels of impact are set;
- Phasing-out of the use of Emamectin Benzoate and bath treatment biocides;
- Farm salmon escape events are treated on full producer responsibility basis;
- Increased research into, and the introduction of regulatory measures for, the wild capture of cleaner fish.

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

We 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.*"

Some limited progress is being made here. On 6th February, in oral session in front of ECCLR, David Sandison from the SSPO promised to publish farm-by-farm lice and mortality data on a voluntary basis, but the range of data shortages identified in the SRSL report goes far beyond that one single problem (and even there, that will not apply to that minority of producers who are not SSPO members).

SIFT's view is that concerns about gaps in ecosystem data are matched by gaps in economic data.

SIFT also believes that there should be better modelling as well as better data collection. The existing approach, based on measurements within an Allowable Zone of Effect (AZE), is being updated, but research cited by SRLS (para. 4.10) noted that aquaculture treatments are responsible for crustacean depletion at distance from treated fish farms. In low-current sites, outflow of treatment and faeces will have limited spread but more concentrated effects: in higher-flow sites, conversely, the effects will be more widespread but at lower levels. Neither are sufficiently understood, but the latter is particularly under-examined and relevant for the sites where expansion is likely to be sought.

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

SIFT concurs 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:

- site location;
- cumulative impact of multiple salmon farms;
- ecosystem impacts;
- impacts on other industries;
- transparency and reporting obligations.

Accordingly SIFT shares the view of the majority of the panel at your 7th March session that meeting the industry's growth targets would be environmentally and economically detrimental, at least under the current regulatory regime.

SIFT urges REC to support a coordinated single licence regime that takes account of planning and economic/environmental impacts for siting (whether considering the continued operation of existing sites or approval of new sites), the ending of the use of emamectin and other biocides, an end to seal shooting and ADDs (as called for by ECCLR, paras. 247 and 248), measures to eliminate escapes, and more generally a timescale for an end to open cage operation (with exceptions only if and when there is a robust research basis for them).

As the SRLS report states [para. 3.3.5], "*In principle, existing regulatory procedures, including accurate assessment of sites before operating licences are issued, should avoid the farm-scale effects described here for UKBAP habitats. However, this has not always been the case, as the maerl example shows.*" SIFT agrees that UKBAP habitats have not always been adequately protected. Furthermore we believe other important benthic habitats have also been inadequately protected, and that the regulatory regime must be strengthened to take this into account.

Sift urges REC to support a timetable for a shift to a 100% RAS/CC 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. Essentially, the externalisation of industry costs onto a public asset must cease. 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?

Depending on the final outcome of Brexit talks, the post-Brexit deal is likely to hamper producers' ability to export freely to the EU. This will make adopting the highest possible environmental standards even more urgent given the risks of trade barriers associated with poor practice (similar to the impending US ban on Scottish farmed salmon associated with seal shootings). Market access for UK aquaculture products, in a context where the UK has third country status, will be harder to maintain if the current deregulated approach is also maintained.

The Sustainable Inshore Fisheries Trust
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