

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM WEST SUTHERLAND FISHERIES TRUST

West Sutherland Fisheries Trust is a fisheries management organisation based in Sutherland. We undertake monitoring of wild fish populations and use the data to advise on management within the area and quantify potential impacts. The Trust works with both the wild fish and aquaculture industries.

We welcome this opportunity to provide views to the REC Committee. We acknowledge the report produced by the ECCLR Committee and welcome its findings.

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

We believe that there should be a review of the planning and regulatory system for aquaculture. This currently involves a number of bodies, creating a complicated system, but allows wild fish to fall through the net. Neither the Fish Health Inspectorate nor SEPA have the power to regulate impacts on wild fish, including the effect of biomass on sea lice impacts.

While the monitoring of wild fish has become a condition of planning decisions through the development of Environmental Management Plans, this is an imperfect solution. We feel that regulating bodies should have powers and duties to protect wild fish and that a more 'joined up' system should be developed. This would benefit both the wild fish and the industry.

Within this we recognise that aquaculture is not the only factor affecting fish populations. However, it is the focus of this inquiry and one of the things that can be controlled. To have a suitable regulatory system in place would assist with this.

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?

Aquaculture is an important part of the Scottish economy, particularly within the west coast. However any development must be environmentally sustainable and follow the precautionary principle. While recognising that the stated growth targets are industry and not Government targets, it is important that there is a robust assessment of the environmental carrying capacity before the Scottish Government adopts these targets. This should include existing as well as new sites.

As stated above, the current regulatory system does not sufficiently protect wild fish and therefore it is important to address this point before moving towards growth targets.

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?

This issue is outwith our field of expertise. We are aware that there is the potential for disease and parasite transfer to wild fish (while understanding that these will have arisen initially within the wild and transferred to the farm) and this should be

considered. The primary focus in recent years has centred on sea lice, but it is important to consider all issues, such as the current gill challenges.

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

No. While there will be a vast amount of data available on the individual farms these are hidden or reported on a restricted basis. We feel that it is important to achieve greater transparency in the publication of data from individual farms to ensure robust assessments of potential environmental impacts. This would allow greater resolution in the determination of any potential impacts, but must be combined with robust data collection from wild populations.

From a wild fish perspective, we feel that more monitoring of parasite and disease, and the potential interactions of the wild and farmed fish should be instigated. While the fisheries trusts currently monitor sea lice impacts on sea trout within the estuaries through a programme of sweep netting, there are limitations within the scope and resolution of these data. The Trusts are constrained by time and financial resources but have produced a long term data series that identifies interactions and effects. However we feel that it is important to establish a more robust and fully resources programme of monitoring within the wild fish to compliment that coming from the farms. This will require input from the statutory bodies.

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

Yes, we have the view that the regulatory system is not sufficiently robust. As well as the points detailed above, other issues include:

- Fish farm escapes. While the number of escapes has, in general, declined in recent years, these still occur. Identified by the Norwegians as the greatest threat to wild salmon, a study by the Rivers & Fisheries Trust Scotland identified a significant amount of introgression throughout Scotland. We feel that it is important that farmed fish are marked, or genetic samples taken, to enable identification of the source of escaped salmon and that sanctions are in place. This will not address the issue of introgression *per se*, and the use of triploid fish may be another route to explore. This is important from both freshwater and sea sites.
- Freshwater production. The technology to produce smolts in closed containment is well established and we would ultimately like to see their production in open net pens phased out over a suitable time frame.
- Sea lice. We would like to see a more robust regulatory system for the management of sea lice. The regulatory levels for reporting and intervention are significantly higher than the levels set in the industry's own Code of Practice. Despite this, there appears to have been little enforcement of the intervention actions. We would like to see the levels enforced and, over time, reduced to those closer than the industry targets. This would benefit both the wild and farmed fish.

Evidence from the sweep netting would suggest that the greater impacts from sea lice occur in the 2nd year of production. It is unclear if this is a time or biomass impact but the effect is well demonstrated. As such we see the

benefits to the wild fish of reducing this interaction, through the development of suitable technological solutions, while ensuring that any system initiated does ultimately benefit the wild fish. Technologies, include developments such as recirculation systems, lice skirts, fallow periods and cleaner fish to name a few, have the potential to greatly improve the situation for wild fish. However discussion and research will be required, underpinned by suitable regulation, to ensure that wild fish are considered and protected within the development and roll out phases.

- Relocation. There is currently no mechanism to move production from sensitive inshore marine sites, to less sensitive locations. If the industry is seeking to move production to larger, higher energy sites, we believe that there should be a mechanism to require an associated reduction in production from sensitive inshore sites.
- Cleaner fish. The use of cleaner fish, particularly wrasse, would appear to be having a positive effect on sea lice numbers, to the benefit of both wild and farmed fish. However we feel strongly that there is a need for regulation of the wrasse fishery. The current situation does not protect the fish or the environment, and with no data on these species or the impact of unrestricted fishing, we feel that the precautionary principle should be applied.

West Sutherland Fisheries Trust

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