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Mairi Gougeon MSP
Cabinet Secretary for Rural Affairs and Islands

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By email to - scottish.ministers@gov.scot

Dear Cabinet Secretary

Scottish Government review of aquaculture

In your letter to Professor Griggs (30 July 2021), setting out the terms of the external review of the current regulatory processes involved in fish farming, we welcome your emphasis that any growth of fish farming will only be permitted in line with the Scottish Government's ambitions on local decision-making and a vibrant, inclusive democracy, and that the environment must be protected. This industry has destroyed its social licence to operate by largely refusing to acknowledge its environmental impacts and ignoring the views of coastal communities.

Fish farms do need to be more strictly controlled, with immediate effect. We are deeply dismayed therefore that effective regulation is to be yet further delayed by this review, which will not even start its final stage until late 2023.

This means the status quo on salmon farming and its regulation will have been maintained for five years since the 2018 Scottish Parliamentary Inquiry concluded that the status quo was not an option, and that urgent reform was needed before any expansion of salmon farming could occur.

Instead, this slow review will mean that the industry is likely to have achieved its goal of doubling before any significant new regulations could ensure that its environmental and societal impacts are properly assessed. It is difficult to see this as anything other than kicking the can, not only further down the road, but almost completely out of sight.

The REC Committee's Report (November 2018) included 65 detailed recommendations to improve regulation and minimise environmental impacts. In January 2019, your predecessor, Cabinet Secretary Fergus Ewing, formally responding to the REC Report, emphasised "our collective resolve to make tangible early progress". We do not see how a further two-year review meets that commitment.

Indeed, since 2018, there has been no tangible progress in terms of outcomes *in the water* on any of the big three issues, clearly identified by the REC and ECCLR Committees' Reports, of waste, sea lice and mortality, all of which are intimately related to sustainability.

The REC Committee's report recommended that fish farm licensing should be changed to provide effective environmental protection, particularly to wild salmonids, PMFs and sensitive areas such as MPAs. Its intention was not to first facilitate the industry's expansion by streamlining the consenting system.

The underlying assumption of your letter to Professor Griggs is that the industry is environmentally benign. You refer to it being "a source of home grown healthy low carbon protein". This industry sources and transports much of its feed components, including soy and wild fish ingredients, from

South America and West Africa. In fact, it is reliant to produce its protein on wild fish populations that face significant pressures from industrial fishing; every year the industry uses many more tonnes of wild fish than the output of farmed salmon. It also has significant road and marine transport needs and then flies much of its final product (the fish that have not perished due to disease and/or parasites before harvest) to destinations across the world. This is not a low carbon industry.

You also say that salmon farming “will be an essential component of Scotland’s green recovery”. Open net salmon farming simply cannot be deemed “green”. In all the territories globally in which it operates, it has significantly damaged or destroyed coastal ecosystems to the serious detriment of the fauna, flora and people that depend on unpolluted and farm parasite-free waters.

We believe that open net salmon farming is unsustainable and we are not aware of any jurisdiction where the goal of “sustainable” open net salmon farming has been realised. Other jurisdictions (for example Washington State, British Columbia and Denmark) now appreciate this and are reining in the industry. Argentina, mindful of what has occurred here and elsewhere, has banned open net salmon farming from its waters.

You will be aware that Mowi has been successfully sued in the US for calling open net farmed salmon “sustainable”. See <https://www.intrafish.com/legal/mowi-agrees-to-pay-1-3-million-to-settle-us-class-action-suit-alleging-deceptive-marketing/2-1-983632>

As far as Scotland’s industry is concerned, what is required is not another review, but immediate implementation, without any further prevarication, of the recommendations of the 2018 REC and ECCLR Reports.

Your sincerely



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Co-signed and supported by:



