



Coalition calling for independent CBA on salmon farming

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Mairi Gougeon MSP

Cabinet Secretary for Rural Affairs and Islands

12 November 2024

By email to - scottish.ministers@gov.scot

Dear Cabinet Secretary,

We write to you as a coalition of Scottish businesses, industry representatives, youth groups, conservation groups, community groups and charities, ahead of your upcoming evidence session at the Rural Affairs and Islands (RAI) Committee's follow up inquiry into salmon farming.

We write to ask that you urgently re-evaluate your policy on the open-net salmon farming industry, in light of the growing body of evidence demonstrating that the industry causes multiple environmental, welfare and sustainability problems¹; and one which is widely held to be having a negative impact on many other stakeholders within Scotland.

The open-net salmon farming industry is regularly hailed as one of Scotland's economic success stories. However, peer-reviewed research has found that the economic benefits of the industry have not been adequately weighed against its detrimental impacts on other sectors of Scotland's economy (not to mention detrimental impacts on the marine environment, without which there can be no blue economic growth).²

We fully appreciate the need for high-quality jobs in Scotland's coastal communities, both on the west coast and the northern isles. However, this must not come at the expense of damaging our shared natural assets; particularly as climate change and warming waters increasingly mark the open-net salmon farming industry as one whose time is finite.

¹ https://wildfish.org/wp-content/uploads/2024/09/Open-Net-Salmon-Farming_Literature-Review_Updated-160924.pdf and <https://wildfish.org/wp-content/uploads/2022/06/Thorstad-Finstad-2018-Impacts-of-salmon-lice-NINA-Report-1449-2.pdf>

² https://wildfish.org/wp-content/uploads/2024/07/WildFish_Riddington-Radford-Gibson-Economic-Contribution-of-Salmon-Aquaculture-to-Scotland.pdf

The number of new full-time jobs in the Highlands & Islands region created by the industry since 1990 is just **253**. The recent Fish Farm Production Survey, published last month, showed that the number of jobs on salmon farms decreased in 2023.³ Nonetheless, the industry continues to benefit greatly from Scottish Government grants and research funding (that could be used instead to fund a just transition for those employed by the industry).

What is often forgotten is that this industry uses Scotland's precious natural assets for 'free' disposal of its wastes and inflicts widespread damage on the ecosystems that support other commercial activities. These are costs that are currently ignored in Scottish Government assessments of the 'value' of the industry to Scotland as a whole. There are also increasing impacts on ecosystems around the globe, via its feed sourcing and use of cleaner fish. Additionally, the industry is plagued with increasingly horrific fish welfare issues, with an estimated 17.4 million salmon deaths last year alone.

We are therefore calling on you, as Scotland's Ministerial representative for our Island communities and marine operations, to consider the interests of all stakeholders, and **urgently commission an independent Cost-Benefit Analysis of Scotland's salmon farming industry, to consider its wider economic impacts**. Until these impacts are assessed, we consider that there should be a **halt on further growth of the industry**.

Yours sincerely,

AFFtheClyde

Alan Stewart, Community Councillor, Argyll & Bute

Arthur Wickson, Upper Oykel Fishing

Blue Marine Foundation

Celentano's Restaurant with Rooms, Glasgow

CLIMAVORE CIC

Clyde Porpoise CIC

Community of Arran Seabed Trust (COAST)

Cromarty Firth Fishery Board

David Cosh, River Doon District Salmon Fishery Board

Dr Cal Major BVM&S MRCVS MSc - Veterinary Surgeon and
CEO Seafish charity

Dr Conor Ryan, Research Scientist

Dr Neil McRae, MRCVS, BVM&S - Veterinary Surgeon

Dr Richard Luxmoore

Dry Island, Badachro

Dundonnell Estate

East Neuk Seaweed

Ederline Estate

Eilean Darach Estate

³ <https://www.gov.scot/publications/scottish-fish-farm-production-survey-2023/>

Ethical Seafood Research
Ewan Kennedy, lawyer and a founder of saveiseilsound
Friends of the Sound of Jura
Grimersta Estate
Harris McNeill, Eastfield Restaurant
Helmsdale District Salmon Fishery Board
Inveran Fishing Limited
Invercassley Tea Rooms, Sutherland
Isle of Gometra
Janis Piggott, Youth Worker and Charity Co-ordinator, Ullapool
Kilninver Estate
Leven River Guardians
Lloyd Morse, The Palmerston, Edinburgh
Loch Lomond Angling Improvement Association
Meikleour Estate/ Meikleour Arms
Open Seas
Orkney Trout Fishing Association
Oykel Bridge Hotel
Rewilding Britain
SCOTLAND: The Big Picture
Scottish Creel Fishermen's Federation
Scottish Food Guide
Scottish Salmon Think-Tank
Sealife Adventures
Simon and Cressida Cowell, Little Colonsay
Skye and Lochalsh Environment Forum
Skye Communities for Natural Heritage
Slow Food Scotland
Sustainable Inshore Fisheries Trust (SIFT)
The Wild Cooke
Tim Maddams, chef and food writer
Ullapool Sea Savers
WildFish Scotland
WildLand Limited
Young Sea Changers Scotland