

CCN position statement on salmon aquaculture in Scotland

Background

Over 200 salmon farms are spread along the Scottish coast, producing approximately 200,000 tonnes of salmon annually, directly providing around 1,500 jobs in rural communities.

The Scottish Government's *Vision for Sustainable Aquaculture*¹ says the industry **“must operate within environmental limits, to ensure that our waters are clean and safe, supporting healthy and diverse flora and fauna”**; and **“delivering significant and lasting socio-economic benefits for Scotland and for the communities that host aquaculture businesses”**.

However, the current practice of farming salmon in open-net pens raises significant environmental challenges because nets allow free passage to pollutants, pests and diseases.

The proximity of fish farms to wild salmon and sea trout migratory routes mean that sea lice infestations and disease transmission pose a direct threat to wild fish populations. The release of significant quantities of organic waste and pesticides into surrounding waters impact other marine species, some which are caught by local fishermen.

Currently, we have almost no understanding of the cumulative impacts of multiple farms operating in a single area, or of the whole industry's impact on the wider marine environment. We do not know the capacity for Scotland's coastal waters to cope with existing human pressures (such as pollution) to which fish farms are contributing.

This is concerning as the industry is aiming to double production by 2030 (from 2017 figures)², further exacerbating its environmental impacts. A 2018 Parliamentary Inquiry into salmon farming³ concluded that **“urgent and meaningful action needs to be taken to address regulatory deficiencies as well as fish health and environmental issues before the industry can expand”**. Despite the recommendations for advancing sustainability, progress has been slow.

Another key concern is that from January to November 2022⁴, fifteen million salmon deaths were reported by farms in Scotland. Mortality rates of these migratory, cold-water fish will only increase as sea surface temperatures increase, in response to

¹ <https://www.gov.scot/news/vision-for-sustainable-aquaculture/>

² <https://foodanddrink.scot/helping-business/other-resources/publications/aquaculture-growth-to-2030-a-strategic-plan-for-farming-scotland-s-seas>

³ <https://digitalpublications.parliament.scot/Committees/Report/REC/2018/11/27/Salmon-farming-in-Scotland#Introduction>

⁴ Scottish Government, Fish Health Inspectorate data.

the climate crisis, which will eventually inhibit their survival altogether. The industry has no solution to this.

The CCN position

We believe further expansion of the industry to be irresponsible while there are still so many unknowns about the extent of its existing impact. We are therefore calling for immediate action from the Scottish Government to address the multiple challenges associated with the use of open-nets in salmon farming in Scotland. This should include a review of existing farms and closing them where they are found to be having damaging impacts, as well as limiting expansion into new areas until we have a comprehensive set of impact assessments.

Ultimately, we want to see a significant reduction in the industry's present impact. This can be achieved by transitioning to closed containment systems to keep farmed fish separate from their wild counterparts, mitigating the threats to rapidly declining wild salmon populations, while also capturing waste and chemicals. Other countries are already banning open-net pens or shifting to closed containment systems.

However, we caution that closed containment systems are not a panacea for the farming of a carnivorous fish, as they rely on feed sourced from other wild-caught fish, often caught in waters in the global south and shipped to the global north⁵. These fisheries deprive local people of their staple protein source.

Nor would closed containment systems address concerns related to animal welfare and the transmission of diseases that arise from confining thousands of animals in an enclosed space.

Regarding semi-enclosed systems, these systems will only reduce overall pollution if they are used to replace existing open-net farms. Their potential to diminish pollution remains limited when they are used to facilitate the expansion of fish farming into regions where open-net farms are unfeasible.

What CCN is calling for

The current approach to salmon farming fails to deliver the environmentally sustainable, high quality industry that the Scottish Government describes in its *Vision for Sustainable Aquaculture*. Below we set out in more detail some key actions we would like to see taken now.

1. Acknowledgement of a need for step change of approach

The 2018 Inquiry's main conclusion was: "***the status quo is not an option***". The Scottish Government should unequivocally acknowledge that the industry's current environmental and animal welfare issues are unacceptable, and that the status quo in terms of regulation is ineffective.

⁵ <https://www.lancaster.ac.uk/news/nutritious-fish-stocks-being-squandered-by-salmon-farming>

As the *Vision for Sustainable Aquaculture* states, pollution must be tackled at source and polluters must pay to clean up their own waste. The Scottish Government should commit to phasing out open-net salmon aquaculture, with a target date and principles for the transition.

2. Immediate pause to industry expansion plans

Consents are still being given for new farms despite clear threats to wild fish and other marine species and habitats. Planning decisions assess each new farm application largely in isolation, ignoring how its impacts might be compounded by existing farms in the area. Further consenting should be paused until we have a better understanding of the capacity of Scotland's seas to assimilate waste and the impacts of sea lice and escaped farmed fish on wild fish populations. We also need a fuller understanding of the potential impacts of climate change on farmed fish.

3. Application of the Precautionary Principle

Both international and UK law requires decision-makers to apply the Precautionary Principle (PP)⁶ in the face of potential risks, when they lack sufficient information to make safe decisions. The 2018 Inquiry noted this deficiency. Awareness of the PP is extremely limited and local authorities rarely refuse fish farm applications on precautionary grounds. The Scottish Government must be explicit with fish farming industry regulators about where and how the PP should be applied. Consenting should be paused for some new farms and the operation of some existing farms should change, until better information is available.

4. Spatially planned aquaculture

Some areas are unsuitable for fish farming. In others, clusters of farms have already exceeded the area's capacity to deal with pollution. Appropriate spatial planning (as called for by the 2018 Inquiry), alongside cumulative environmental impact assessments, would ensure that the sea's capacity to deal with pollution from fish farms is not exceeded. This should be at the heart of the Scottish Government's plans for environmental recovery as aligned with the Scottish Biodiversity Strategy and forthcoming National Marine Plan 2.

5. Attention to fish welfare and mortality (including cleaner fish)

The industry appreciates that the most efficient way to increase fish farm production would be to keep more fish alive, but rapidly increasing mortality rates of 25% and more suggests that this is impossible. This figure excludes the enormous numbers of

⁶ "preventive measures are to be taken when there are reasonable grounds for concern that human activities may bring about hazards to human health, harm living resources and marine ecosystems, damage amenities or interfere with other legitimate uses of the sea, even when there is no conclusive evidence of a causal relationship. A lack of full scientific evidence must not postpone action to protect the marine environment."

<https://www.ospar.org/about/principles/precautionary-principle>

fish that die in hatcheries. No other type of farming allows so many animals to die in its care. There should be a process in place which allows robust intervention by regulators when serious fish mortality events occur. This should include limiting or closing down of production until the causes are addressed.

Physical and chemical treatments for sea lice also kill cleaner fish (wrasse and lumpfish). All the surviving cleaner fish are then slaughtered along with the salmon, which is unethical, cruel and ultimately ecologically unsustainable. Many wrasse are harvested from their natural habitats. These are long-lived fish, which are important components of the wider marine ecosystem. The use of wild-caught cleaner fish and of cruel chemical and physical lice treatments must end. Animal welfare must become a top priority for the industry in place of PR and greenwashing, including third-party certification schemes which are not sufficiently independent of the industry.

6. Genuine local accountability

CCN considers the offer of financial benefits to communities ahead of consenting decisions akin to bribery. It must not be assumed that communities, once informed of the issues associated with open-net salmon farming, would continue to accept degradation of marine ecosystems in exchange for financial and social benefits. Action taken to clean up the industry can help rebuild trust and to restore the industry's social licence to operate in the coastal communities that bear the brunt of its impacts.

Nevertheless, respecting community views during the consenting process for new and expanding farms should be standard practice. Aquaculture must not be sited where it is not welcomed. We call for a new mechanism to enable true democratic decision-making, such as a community vote.

7. Consider impacts on Scotland's iconic coastal landscapes

Scotland's landscape is consistently cited by visitors as the main reason for their trips. It is a priceless asset that supports more jobs in coastal communities than fish farming. The ongoing streamlining of fish farm consenting must not weaken the current level of protection afforded to these landscapes.

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