

CCN Aquaculture Sub-Group Aims and Positions

Coastal communities, and others whose livelihoods depend on the sea, have viewed with increasing concern and will no longer tolerate the damage caused to Scotland's marine environment by open-net fish farming.

On expansion of the industry, the members of the Coastal Communities Network's Aquaculture Sub-Group call for a temporary halt to any expansion of marine fish farming, until such time as the many issues identified by the recent ECCLR and REC Committees' Reports into salmon farming in Scotland are resolved, and rigorous monitoring of existing farms, with enforcement as against strict standards, is put in place by all relevant regulators, including planning authorities.

On Strategic Environmental Assessment, as the carrying capacity of Scotland's seas for finfish farming is unknown, and has never been assessed, a detailed Strategic Environmental Assessment should be carried out as a matter of urgency, and before any expansion of existing farms or any new farms can be contemplated.

On regulation and enforcement, no relevant regulators should operate a system of self-monitoring by fish farmers of their own environmental impacts. All monitoring and enforcement of rules relating to the environmental impact of Scottish finfish farms must be transparent, independent and paid for by appropriate licence charges placed on fish farmers. Licence charges should be reduced for farms, where less damaging methods such as closed containment are employed, providing a strong incentive for the industry.

On protected areas and species, there should be an early assessment of the potential impacts of existing fish farms on Marine Protected Areas (MPAs) and Priority Marine Features (PMFs). Until the outcome is known, no new farms, nor any expansion of existing farms, should be permitted within Scotland's Marine Protected Area Network.

On wild salmonids, the Scottish Government must identify a public body charged with controlling the negative effects of open-net farming of salmonid fish on wild salmonids, including the effects of sea lice, other diseases and escapes on wild fish populations, and urgently put in place a comprehensive, transparent and robust regulatory system to control those impacts by the end of 2020, at the latest. Existing fish farms must be moved away from wild salmonid rivers and known or suspected migration routes as matter of urgency, and no new farms should be permitted in such locations.

On wrasse, until such time as mandatory management measures are put in place and adequate data has been collected and analysed to enable a thorough wild wrasse stock assessment to be performed and to set sustainable catch limits, no wild wrasse fishery should be permitted in Scotland or, indeed, elsewhere in the UK.

On cetaceans, the use of ADDs on fish farms that may disturb cetaceans should cease immediately.

On seals, all shooting of seals by fish farmers must cease by the end of 2020. Fish farms, which cannot control seal predation with double nets and other non-damaging control mechanisms, should not be permitted to operate.

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On the future of the industry, the Scottish Government and the industry should work urgently to move all fish farm production into closed containment as soon as practicable, and no later than 2030.

On the wider environmental impacts of the industry, the industry should make immediate efforts to effectively manage plastic pollution and other material waste, and to implement measures to reduce their carbon emissions and overall impacts on Scotland's marine ecosystems.