

Coastal Communities Network Brief

Scottish Government's plans for expanding aquaculture

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The Coastal Communities Network (CCN) represents 23 community-led groups. We are deeply concerned that the Scottish salmon aquaculture industry is being allowed to expand without full consideration of its environmental impact and jobs in coastal communities.

The current model of open-net pens allows organic waste and pesticides to be released into the surrounding water. Sea lice infestations and diseases can also be passed to wild salmon and sea trout, which swim past fish farms.

A 2018 Parliamentary Inquiry 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*”¹. It said, “*the status quo is not an option*”

The Inquiry recommendations would have advanced fish farming towards environmental sustainability, but few have yet been implemented. Meanwhile the industry continues towards its target of doubling production by 2030.

Fish farming could continue to provide jobs, without harming the marine environment, if it adopted closed containment systems such as are used in other countries. This approach would keep farmed fish separate from their wild counterparts, reducing the risks to rapidly declining wild salmon populations. They also capture waste and chemicals, preventing pollution of our shared marine environment and protecting the livelihoods dependent healthy seas.

On 3rd May 2022, the Cabinet Secretary for Rural Affairs accepted the recommendations of a report on streamlining the current regulatory system (the Griggs review²). CCN welcomes some of these recommendations but is deeply concerned by its aim to enable more rapid expansion by speeding up fish farm consenting.

The following are some of our concerns about regulatory streamlining, in more detail.

¹ https://archive2021.parliament.scot/S5_Environment/Inquiries/20180305_GD_to_Rec_salmon_farming.pdf

² <https://www.gov.scot/publications/review-aquaculture-regulatory-process-scotland/>

❑ Sustainability of open-net pens

The Griggs review wrongly assumes that fish farming is environmentally sustainable and can expand without causing cumulative harm. Wild salmon have collapsed in every country that hosts intensive open-net salmon farms. Other countries are banning open-net pens or moving to closed containment. Scotland should lead the way.

❑ Local accountability

Local communities often object to planning applications. Safeguards must be built in to ensure that this democratic right is not be diluted if local authorities surrender planning powers to another regulatory authority. This is essential to help restore trust between communities and industry.

❑ The precautionary principle

Scottish law requires caution in the face of uncertainty but the Griggs review suggests this need not apply to aspects of fish farming. This contradicts the 2018 Inquiry's recommendation for the Scottish Government to ensure that the precautionary principle is properly applied.

❑ Independent science

Good decisions require robust evidence. CCN welcomes the Cabinet Secretary's choice of the Scottish Science Advisory Council (SSAC) to collate and assess the scientific evidence relating to aquaculture. Environmental organisations and informed citizens should also be involved. The SSAC must publish all its assessments and data on fish farm impacts.

CCN call for Scottish Ministers to ensure the environmental and other impacts of salmon farming industry are fully understood before consenting any more or larger farms.

We also ask that:

- By 2030, all fish farms will be using closed containment technology, ensuring: zero pollution, zero impacts from sea lice and fish farm escapes, and zero impacts on other marine users
- the role of communities in decision making is strengthened,
- the precautionary principle is applied robustly
- third parties are able to contribute to and scrutinise the science