

Mr Fergus Ewing
Cabinet Secretary, Rural Economy
The Scottish Parliament
Edinburgh
EH99 1SP

Friday 21st December 2018

Re: RECC Report on Salmon Farming in Scotland

Dear Mr Ewing
Copying to all members of the REC Committee

The Coastal Communities Network (CCN) would like to take the opportunity to both commend the REC Committee on the recent report on Salmon Farming in Scotland and to highlight some of our ongoing concerns.

Fish farming does support valuable jobs in small coastal communities but fish farm pollution also directly impacts sustainable jobs in the communities that CCN represents. It is on this basis that our constituent community group members welcome many of the recommendations in the report, particularly the recognition that fish farming impacts those whose work depends on the health of the sea.

We welcome the recommendations calling for more transparency within the industry and its regulators, and for tighter regulation and better enforcement of the regulations. We also welcome the recommendations for better guidance to the Local Planning Authorities, and for the application of the Precautionary Principle to these and other decisions, where knowledge gaps exist.

Gaps in current systems

As you may be aware, CCN has an aquaculture sub-group. Network members have met aquaculture officials from Marine Scotland, Local Planning Authority representatives, SEPA and other government agencies. It is clear that there are gaps in the existing mechanisms for addressing the critical sustainability issues which the RECC's report highlights, but we remain hopeful that progress is on the horizon, and look forward to continuing to meet relevant officials, in light of these new recommendations.

One gap of particular concern to CCN's community groups is the lack of coordination between regulating agencies, with none taking responsibility for the impact of sea lice on wild salmonid populations. We await the recommendations of the Wild Fish Interactions Working Group with interest, while regretting that the communities most affected by these impacts have not been asked to speak to the group.

The report recommends giving Marine Scotland much of the responsibility for solving the industry's problems but we are concerned that Marine Scotland has conflicts of interest, as it is the industry's advocate inside Government and one of its environmental regulators.

This position is untenable and results in a de facto pro-industry bias, without MS giving the clear guidance that is urgently needed on the environmental risks associated with planning and licensing decisions, to ensure that the industry is sustainable. Going forward, we would like to see the RECC give greater scrutiny of Marine Scotland's decisions and advice. A co-ordinated approach is needed to the environmental regulation of finfish farms and new structures and processes must be established, to produce transparent, evidence-based decision-making. We welcome SEPA's Sector Review consultation for this reason.

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The Precautionary Principle

CCN welcomes the report's recommendation that *"urgent and meaningful action needs to be taken...before the industry can expand"*. Given the scale of the environmental impacts that have been made clear in both the ECCLR and REC Committee reports, and in SEPA's most recent report on the long-lasting pollution of the seabed by fish farm chemicals, CCN believes there should be a temporary halt to expanding fish farms and licensing of new sites. We have presented evidence to the RECC inquiry and at meetings with SEPA and MS officials to support our case for a temporary halt to the expansion of the industry, until it can be shown to be sustainable.

During that time an Environmental Impact Assessment should be done of the whole industry, including the impact of sea lice on wild salmon and sea trout, and of pollution on creel fishing and other jobs, based on first understanding the carrying capacity of the sea for fish farming using open nets. SNH told the RECC inquiry that this carrying capacity is unknown.

CCN commends the REC Committee for its recommendation that *"the Scottish Government should provide strong and clear leadership in ensuring that the precautionary principle is applied, producing appropriate policy and guidance documents as necessary."* Applying the precautionary principle is a legal obligation and a vital safeguard to protect the environment and those whose sustainable jobs depend on it, when there is a likelihood of harm but in the absence of certainty. It is the application of common sense, when the risk of long-term harm is high.

We urge the Scottish Government to now apply the Precautionary Principle in a timely and meaningful way, in order to protect the livelihoods of the coastal communities we represent, and the health of the sea on which we depend. This is to ensure that the industry's ambitious plans to double in value by 2030 do not leave a legacy of harm.

The status quo is not an option

It is disappointing that the RECC report's top line still assumes that the salmon farming industry brings a net gain in jobs and income. Until the job losses caused by salmon farm impacts are fully assessed there is no certainty that this is true, in which case the Government's policy for expansion is based on a false assumption and the economic costs to Scotland could be negative. We do not yet have the full picture and urge the Scottish Government to study the socioeconomic costs of finfish farming with open nets, as well as its benefits

Scotland should be proud of the health its seas, and of its seafood and tourism businesses that depend on them. The Scottish Government is committed to the principle that the polluter pays to clean up its own waste. It is now time for the fish farming industry to lead the world by doing so. It is our shared opinion that closed containment systems are the end goal which the industry should be working towards and there is a golden opportunity to achieve this change now, with millions about to be spent on new equipment. It is very positive that the REC Committee has requested urgent work on closed containment and on considering incentives that could move the industry in that direction. This would be much better than developing larger open-net farms in high-risk exposed locations where there will still be sea lice and pollution problems, and where escapes of farmed fish are more likely

The industry and HIE told the RECC inquiry that Recirculating Aquaculture Systems will remain prohibitively expensive for the coming decades. This is not true, as shown by [this news item](#) in the industry press.

There are also viable, closed containment systems already working in the sea, for instance Akvafuture in Norway.

Scotland is at risk of missing out on these game-changing, innovative closed containment technologies, which would create many more jobs than the present, rapidly automating industry can, if it continues to use out-moded, polluting open-nets. Only Government can achieve this sort of transformative change. At present, more and more coastal communities are realising that this is an anti-social industry, polluting a shared resource, which is terrible for the

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reputation of Scottish seafood. By achieving a world-leading change to closed containment, you could make us proud once more of the Scottish salmon industry.

The REC Committee has echoed the ECCLR Committee's statement, and your joint ministerial statement, that 'the status quo is not an option', but since the RECC inquiry and the ECCLRC's environmental inquiry were announced, we have seen a number of very significant expansions, including two at inshore sites in the Sound of Jura, at farms that have bad records for sea lice and deliberate overstocking. Proposals for the [Isle of Gigha](#), the wild side of Jura (north of [Corpach Bay](#)), [Loch Carron](#) and Kilbrannan Sound, among others, are currently awaiting determination.

As Cabinet Secretary for the Rural Economy, you must now decide how best to implement the REC Committee's recommendations. We urge you to take this opportunity to ensure that Scotland's finfish farming industry is something to be proud of, rather than leaving a legacy of harm to the other sustainable jobs in our communities.

Yours sincerely,

The following Community Group members of the Coastal Communities Network (the Aquaculture Sub-Group):

[Community Association of Lochs and Sounds \(CAOLAS\)](#)

[Community of Arran Seabed Trust \(COAST\)](#)

[Craignish Restoration of Marine and Coastal Habitat \(CROMACH\)](#)

[Fairlie Coastal Trust](#)

[Friends of Loch Etive](#)

[Friends of the Sound of Jura](#)

[Save Seil Sound](#)

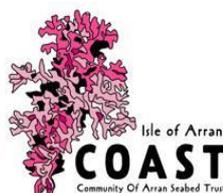
[Sea Change Wester Ross](#)

[Skye Communities for Natural Heritage \(SCfNH\)](#)

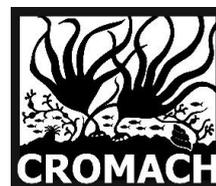
[South Skye Seas Initiative \(SSSi\)](#)



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Lochs and Sounds (CAOLAS)



Community of Arran Seabed
Trust (COAST)



Craignish Restoration of
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