

First Minister, Nicola Sturgeon MSP  
Scottish Government  
St. Andrew's House  
Regent Road, Edinburgh, EH1 3DG  
Via email.

**07 October 2020**

Dear First Minister,

I write on behalf of [Coastal Communities Network Scotland](#) (CCN), a collaboration of locally-focused groups, guided by the belief that coastal communities across Scotland can help to provide long-term solutions to ensure healthy, well-managed seas. Across 16 localities, CCN has amassed local support from tens of thousands of people.

We appreciate that this has been a busy and difficult year for you and we applaud your excellent handling of the Covid 19 pandemic. With Holyrood elections in May, you will have plenty else to think about. However, that is precisely why we write to you now, for you will surely still be First Minister after the elections and the problems which concern us will still be pressing.

We apologise for sending this letter at this precise moment, following so quickly on the revelation that Mr Ewing is subject to a formal complaint. We ask you to accept that it has been in preparation for a couple of weeks and coincidence is not intended.

Many Scots agree with you that wellbeing matters as much as GDP, and a healthy place to live and work is near the top of their list. We all see a stream of news stories about the loss of wildlife and decline of the natural world. Attenborough's Extinction - The Facts was watched by more than three million people, for example.

Our concern is for the stewardship of Scottish seas. We believe that the imbalance between economic activity and environmental responsibility has been badly damaging during the current parliament. We recognise that Scotland needs a strong economy, but Scots understand that our greatest long-term assets are our natural resources.

Conflicts of interest are inevitable and currently these are largely managed by having a Cabinet Secretary for the Rural Economy and another for the Environment, Climate Change and Land Reform. Our belief is that the balance between them has not been correct.

We cite the following examples:

1. In 2018 the REC report on Salmon Farming endorsed many of the recommendations made by the ECCLR committee. Both committees reported that 'the status quo is not an option', but progress has been poor. Both Cabinet Secretaries have said they believe in the need to ensure that aquaculture growth is sustainable, but two years on they have changed hardly anything to make this happen. Worse, they appear unwilling to engage openly with criticism on this score.
2. In April 2020 an independent, peer-reviewed report on the Economic Contribution of Open Cage Salmon Aquaculture in Scotland was published. It found serious exaggerations

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in the Scottish Government's assessment of the value of fish farming, which has been used to justify its support for expansion; it identified that none of the socio-economic costs of the impact of salmon farming are included in any Scottish Government or HIE reports, which have concentrated solely on the benefits. It was five months before there was a direct response to this significant report from the Cabinet Secretary. His response conceded that there has been no Scottish Government "cost-benefit analysis of the sector's interactions with the marine environment and its other users". Given the requirements of the Green Book and the Scottish Public Finance Manual, this raises legitimate questions over the public funding of the open cage salmon farming sector to date, and whether this has been consistent with these requirements. Will additional public funding of the open cage salmon farming sector be allowed to continue prior to an appropriate Cost Benefit Analysis being conducted?

3. A further report commissioned by Marine Scotland into Understanding the Relative Cost-Effectiveness of Sea Lice Management Measures for Farmed Salmon Production in Scotland was published in September 2020. There has not been a corresponding report into the relative environmental damages of these controversial treatments, nor the related animal welfare issues.
4. A report by Ekosgen on Supporting the Economic, Social and Environmental Sustainability of the UK's Marine Sectors was commissioned by Marine Scotland, but reported on the whole of the UK. It was completed in January 2020, but remained unpublished until August 2020. Oddly, only about 20% of the parties from whom evidence was taken are Scottish and 'reluctance to participate ..... meant that a workshop in Scotland was not possible'. This superficial report contains little economic analysis but was immediately used in a very selective way by the Cabinet Secretary for the Rural Economy to trumpet the virtues of salmon farming in Scotland. Again he ignored the impacts on other jobs, as well as the benefits of other sectors.
5. The frequent, unminuted meetings between the Cabinet Secretary for the Rural Economy and the Scottish Salmon Producers Organisation (SSPO) and the individual companies who are members of it does not suggest an open-minded approach to his responsibilities. They also raise suspicions that these companies have preferential access to influence policy. This behaviour does not compare favourably with the difficulty CCN has had in discussing aquaculture with the Cabinet Secretary for ECCLR, rather than with her MS officials.
6. We were recently informed by Marine Scotland of the delay to the Phase 2 Marine Protected Area (MPA) and Priority Marine Feature (PMF) management project, with no anticipated date on which this important work will resume. The project to improve protection given to PMFs outside the MPA network was initiated in May 2017, following the damaging incident in Loch Carron which resulted in the designation of the Loch Carron MPA. The review has made negligible progress in over three years and appears effectively shelved.

Whatever one thinks of the gravity of each of these individual instances, they collectively show an inherent imbalance in favour of economic growth at the expense of the marine environment, which supports many other, more sustainable jobs. The finfish aquaculture sector is damaging the environment every day but the government has little inclination to address its problems.

Even if you feel this is untrue, the Scottish Government's rhetoric and its public front are reinforcing a state of open hostility between the supporters of aquaculture (including the government, Marine Scotland and SEPA) and the growing number of opponents, many of whom are expert in marine

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biology, aquaculture, law, journalism and wildlife management. A more constructive relationship between these two entrenched sides could be achieved, but the initiative has to come from the one where the power lies, and from you.

Please do not take this letter to be a proposal that you should return to a single department covering economy and environment, for such a suggestion would be presumptuous. There are many ways to crack an egg. We merely seek a fairer deal for the marine environment.

We do not here examine the serious economic risks involved in the current single-minded, or dare one say obsessive, devotion to aquaculture using open net cages. These will be dealt with separately elsewhere. To continue with the eggs analogy, too many in one basket can cause problems. Open cage finfish farming is that basket and most of the world is taking its eggs out, with good reason. There may be no such thing in the world by 2030 as it moves to closed containment. Scotland appears stuck with a technology no longer fit for purpose rather than open to progress.

To build an economic case for Scotland as a proud independent nation, famed for its world-class food and drink, the Scottish Government needs to lead the way to the middle ground on salmon farming and quickly make real improvements.

Sincerely,

The Coastal Communities Network Aquaculture sub-group