

Suzanne Smith  
Scottish Salmon Producers' Organisation  
83 Princes Street,  
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17 January 2020

Dear Suzanne

Re: SSPO Invitation to 'Blueprint for the Industry' workshop 23 January 2020

Thank you to yourself and your Board for your invitation to the workshop, on the basis that you have identified the Coastal Communities Network (CCN) as a 'key stakeholder in your industry'. May we first clarify a misapprehension by the SSPO; we are not a stakeholder in your industry, but our members and the wider public are all key stakeholders in the health of our seas and the economy of our coastal communities. We have a vision for our seas, which is *'to be abundant in biodiversity and resilient to future changes, providing sustainable and diverse livelihoods to those living around them, into perpetuity'*, and we take effective actions consistent with this vision.

The CCN Aquaculture Sub-Group is comprised of 11 different community groups that are active on issues related to salmonid farming, and together we hold a wealth of knowledge on the community perspective and local concerns around the environmental impacts of the open-cage salmonid farming industry in Scotland. As you know, we have presented large amounts of evidence, to the ECCLR and REC Committees' inquiries, to support the case for a halt to expansion of the industry, until it is shown to be sustainable.

Our members have consulted on your invitation and as a result, we have agreed to respectfully decline your invitation.

We have set out below the context for our choice and have provided links to some documents, which we hope you will take into account and find of value when considering your 'blueprint'. We remain hopeful that the 'blueprint' and direction of travel for the industry in Scotland will shift from that which has been widely publicised and supported by the Government in Scotland, i.e. doubling the economic contribution of finfish aquaculture by 2030 through reliance upon the continued expansion of the marine open-cage farming sector.

To date, we have seen no intention to shift this direction of travel. In fact, the recent data shows an acceleration in planning and CAR license applications, which have been submitted, while SEPA transitions to fully implement its new regulatory regime. An analysis of the figures by Salmon & Trout Conservation Scotland (S&TCS) from December 2019 shows the open-cage salmonid farm applications approved and in-train since the ECCLRC report (March 2018) represent an increase in maximum biomass of at least 76,200 tonnes. In addition, SEPA has

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approved at least 22 new CAR license applications since spring 2019 (SEPA pers. comm). This acceleration is happening despite the REC Committee report recommendation number 2; *‘The Committee strongly agrees with the view of the Environment, Climate Change and Land Reform Committee (ECCLR) Committee that if the industry is to grow, the “status quo” in terms of regulation and enforcement is not acceptable. It is of the view 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.’*

We assert that the SSPO and the companies it represents know that open-cage farming is harming our marine ecosystem and that you are resisting switching to closed-containment alternatives purely because your profits are greater when you use the sea for free waste disposal. Aside from any moral duty to act as good neighbours to coastal communities, who rely on the sea being healthy, there are plenty of other reasons to make this change:

- the ECCLR and REC committee reports’ recommendations,
- the introduction and further development of SEPA regulations,
- the climate and ecological emergency which is contributing to your problems of mass mortality due to disease, sea lice, jellyfish and harmful plankton blooms,
- the collapse of wild salmon stocks,
- the growing public awareness and opposition to the methods and consequences of open-cage farming,
- the Governments’ halt to expansion in Denmark, and the removal of all marine salmon farms in British Columbia by 2025,
- the vast private equity going into competing land-based, closed-containment systems internationally.

All these reasons are clearly telling you what to do. You urgently need to get on and develop a plan for transition to land-based, recirculating, closed systems before the SSPO and Scotland’s farmed salmon producers get left behind and out-competed.

We trust that you accept and will respect our choice to decline your invitation. Until we see the companies you represent authentically act to change the current direction of travel, and move toward a sustainable future that does not use open-cages, we do not see any value in engaging in such workshops.

Please can you also appreciate that the communities affected by the adverse impacts of salmon farming are all in the west of Scotland and Northern Isles. The fact that all our organisations are community-led, and mainly dependent upon volunteers who have other jobs, it can be difficult for them to find time to attend meetings in Edinburgh. We would welcome Julia Hesketh-Laird to come to our communities and talk to us about a move to closed-containment farming for the sector, and we extend an open invitation to her.

We will of course continue to attend meetings with the Government and industry regulators to ensure a shift toward a sustainable future for finfish farming and for our marine environment in Scotland.

The following CCN documents are published and can be downloaded from the CCN website here: <https://www.communitiesforseas.scot/network-initiatives/aquaculture-subgroup/>

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- CCN statement on salmon farming in Scotland - 29 November 2018
- SEPA aquaculture plan consultation response - 19 December 2018
- Letter to Fergus Ewing, Cabinet Secretary, Rural Economy - 21 December 2018
- CCN briefing, RECC report debate - 4 February 2019

In addition, we have attached a copy of the Salmon & Trout Conservation Scotland submission to the Petitions Committee (PE 1715/B, 5 August 2019), which is also available here:

[https://www.parliament.scot/S5\\_PublicPetitionsCommittee/Submissions%202019/PE1715\\_B.pdf](https://www.parliament.scot/S5_PublicPetitionsCommittee/Submissions%202019/PE1715_B.pdf)

This document gives an excellent summary of the issues to inform your 'blueprint' and also explains why there is so much scepticism about the ability of working groups to cause change, when there have been so many failures to produce effective action in the past two decades.

These failures started with the Tripartite Working Group in 2000-2009 and continued with the failed ACAS-mediated roundtable (2012) and the failed Ministerial Group on Sustainable Aquaculture Interactions Working Group (2013-2015). The current Salmon Interactions Working Group has not yet produced anything effective. These groups use up resources and time, while fish farm biomass expansion continues apace and community scepticism, regarding any effective action to address the known issues, grows accordingly.

The CCN documents give a clear summary of the issues and the direction of travel that our members wish to see in your 'blueprint', and we trust you will find them useful in your work.

Yours sincerely,

The CCN 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)*  
*Eigg Environmental Action Group*