

Ms Mairi Gougeon, Cabinet Secretary for Rural Affairs and Islands

7 April 2022

Re: CCN reaction to the Grigg's Review

Dear Cabinet Secretary,

Members of CCN met with Marine Scotland's aquaculture policy team on 2 March 2022 to discuss the Griggs' review of aquaculture regulation. We are concerned about Professor Griggs' recommendations, several of which could be extremely damaging to the health of Scotland's seas, Scotland's environmental credentials, and would undermine local community representation in decision making.

The 2018 Parliamentary Inquiry into salmon farming concluded that the status quo was not an option and 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". The ECCLR Committee also stated that it was "deeply concerned that the development and growth of the sector is taking place without a full understanding of the environmental impacts".

This step has been skipped and the Griggs review progresses immediately to looking at how to speed up the consenting of new and expanded farms, without asking whether the industry as it stands is indeed desired and sustainable. We are very concerned that the Griggs review will supersede these other important reports. We believe proper safeguards must be put in place before further expansion of the industry can take place.

Professor Griggs criticises the precautionary principle as a barrier to innovation. Both Parliamentary committees were clear that the precautionary principle is a legal obligation which Scotland is required to implement.

Professor Griggs correctly points out that this is a highly polarised area, with low levels of trust. However, he goes on to state that, "those that live in the communities where aquaculture is prevalent and are economically active in that community are generally supportive, where it is understood and trusted that the environmental impacts are appropriately considered and regulated as well." This is simply not true. Many communities living alongside the farms do not want to be paid to put up with the harm they do. They want them to be responsible neighbours.

Coastal Communities Network, Scotland

C/o Fauna & Flora International
5 Rose Street
Edinburgh, EH2 2PR

Website
Email
Telephone

www.communitiesforseas.scot
info@communitiesforseas.scot
0131 243 2790

Professor Griggs recommends centralising consenting under Marine Scotland. This risks disempowering local communities that have good reasons for limiting salmon aquaculture in their waters. Local Planning Authorities, although sometimes lacking the resources and know-how to appropriately deal with some fish farm impacts, are communities' best means to participate in decision-making.

The reputation of salmon aquaculture can be restored if it is willing to end the blight of sea lice, to eliminate all pollution and escapes of farmed fish, to improve welfare and to agree not to use seal scarers/startle devices that drive away dolphins and porpoises. We appreciate that all this cannot happen overnight but the Scottish Government could impose a timetable for all farms to meet these standards by 2030. To restore trust, it is also essential that fish farms are no longer given special treatment in policy - for instance this is the only industry exempt from the new biodiversity obligations in the draft NPF4.

The Scottish Government and Scottish Green Party Shared Policy Programme promised a "vision and strategy for sustainable aquaculture that places an enhanced emphasis on environmental protection and community benefits". We welcome this commitment.

You will appreciate that CCN is not enthusiastic about Professor Griggs' conclusions, but we do want to work collaboratively to ensure that aquaculture is truly environmentally sustainable, supporting the marine environment and coastal communities for future generations.

We implore you not to streamline the consenting of this industry without first implementing the recommendations of the two parliamentary committees and developing the overarching Vision for Aquaculture, which must be fully integrated with other policies and programmes.

We look forward to having further discussion with you on this issue.

Sincerely,

Alan Munro
On behalf of the Coastal Communities Network