



PUBLIC PETITION NO.

PE01336

Name of petitioner

Lawson Devery on behalf of the Salmon and Trout Association

Petition title

Save our west Highland wild salmon and sea trout

Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to take immediate action to protect wild salmon and sea trout stocks from inappropriate commercial fish farm activities by taking action to ensure that (a) all sea-based fish farms are moved away from the estuaries of major wild salmon rivers to reduce the impact of sea lice and (b) ban salmon smolt farms from operating within any wild salmon river system.

Action taken to resolve issues of concern before submitting the petition

Both S&TA and other fisheries organisations in Scotland have made repeated approaches to local government planning departments concerning individual planning applications for either expanding existing sites or establishing new ones. In all cases, as well as commenting on local conditions, such as proximity to wild salmon and sea trout migration routes, we point out the generic problems associated with aquaculture (see S&TA Scientific Review below), and the need for a more radical approach to regulation. Some recent examples in which S&TA has been involved include:

- Eilean Grianain, North of Carradale, Campbeltown – Argyll & Bute Council – new farm passed, with all objections from wild fish organisations ignored
- Broad Bay, Isle of Lewis – Western Isles Council – new farm. Council has asked that the application be resubmitted with modifications, but no evidence of serious notice being taken of generic concerns around aquaculture and wild fish – otherwise the farm would not be sited in the proposed area
- Isle Ewe, Loch Ewe – Highland Council – expanded farm – decision on application pending
- A freshwater smolt farm in Loch Shin was recently refused permission to expand by Highland Council, but its permission to remain in situ was not rescinded. It should be noted that this type of open cage smolt production in a river system with wild salmonid populations present would not be permitted in Norway, the world's largest producer of farmed Atlantic salmon.

In none of these cases, nor any that we know of previously, have the generic problems associated with aquaculture caused any council to change its view about the advantages of having fish farming in their region – economic sustainability invariably takes precedence over environmental sustainability. This is in contrast to S&TA's insistence that all round sustainability is possible within a responsibly operated and robustly regulated fish farming industry, of which local authorities have a significant role

to play through the planning process.

SEPA has been approached on both the relevant issues in the past. Its position is that sea lice emanating from marine salmon cage units, the biggest problem with salmon farms located close to wild salmon and sea trout rivers and lochs, do not constitute a discharge, and therefore fall outside its remit. Similarly, escapes from freshwater loch cages are also outside SEPA's responsibility. It therefore appears that no national agency in Scotland takes responsibility for these issues, and that the industry operates under a voluntary code of practice.

On a national scale, there have been countless attempts by individual rivers owners, district salmon fishery boards, fishery trusts, wild fishery interest groups and environmental groups to lobby government over the past 15 years to relocate seawater salmon farms from the mouths of salmon rivers and freshwater farms from lochs with migratory fish.

S&TA was represented on the Freshwater Fisheries Forum, set up by the Scottish Government to review fisheries legislation. This led to the Aquaculture and Fisheries (Scotland) Act 2007, but the regulation of aquaculture is still mainly conducted under a voluntary code of practice – there is no serious intent being shown by the Scottish Government to be more robust, despite this enactment.

On an international scale, S&TA, along with colleagues in other NGOs from around the northern hemisphere, has put pressure on the Scottish Government through the North Atlantic Salmon Conservation Organisation (NASCO) - an international organisation, established by an inter-governmental Convention in 1984 with the objective to conserve, restore, enhance and rationally manage Atlantic salmon through international cooperation, taking account of the best available scientific information. Member jurisdictions include USA, Canada, Denmark (in respect of Greenland and the Faeroe Islands), Norway, Russia and the EU, with Iceland (a founder member) temporarily dropping voluntarily to observer status following their economic difficulties. S&TA is a member of the NASCO NGO group, which has official status at NASCO alongside national delegations.

The Scottish Government, as members of the EU delegation, is signed up to several NASCO agreements and resolutions, including:

- The precautionary approach to management – which basically says that, in assessing risks to productive wild fish capacity, managers should be more cautious when information is uncertain, unreliable or inadequate; the absence of adequate scientific information should not be used as a reason for postponing or failing to take appropriate measures to protect wild fish from a known or suspected impact.
- The Williamsburg Resolution 2003 (www.nasco.int) – which aims to minimise the impacts of salmon aquaculture on wild salmon. Despite being a signatory through its NASCO membership, the Scottish Government cannot possibly claim to abide by the Resolution in its regulation of the aquaculture industry in Scotland.
- During 2008-10, NASCO has undertaken an Aquaculture Focus Area Review (FAR), where all parties have reported on the regulation and performance of the fish farming industry in their jurisdictions. None of the parties, including EU (Scotland), emerged from the review process with credibility over their handling of aquaculture or their commitment to minimise the impact on wild fish. Scotland's FAR report was one of the worst in this respect, and did not show the Scottish Government's regulation of the industry in any positive light.
- At the 2010 NASCO meeting, during the Special Session on Aquaculture following the Aquaculture FAR process, the NGOs officially made the point that conflicts of interest can arise in jurisdictions where the same department is responsible for managing both aquaculture and wild salmon, which is the case in the Scottish Government. Conflicts can also arise when the same department is responsible for promotion of aquaculture and its regulation. Current evidence suggests that the fish farming industry invariably receives more government support than is given to the protection of wild salmon.

Therefore, in S&TA's view, The Scottish Government's record on regulating aquaculture

means that it is falling short of its international responsibilities and obligations as members of NASCO.

The Salmon & Trout Association recently published a review of peer reviewed scientific evidence relating to the impact of salmon fish farms on wild salmon and sea trout. www.salmon-trout.org/pdf/STA_the_Impact_of_Salmon_Aquaculture_Briefing_Paper.pdf (see summary of issues in section 5 below)

This evidence, together with a policy statement, was submitted to Marine Science Scotland civil servants on March 23 2010, with a subsequent addition on April 7th. In particular, S&TA asked for an immediate 3 point plan:

- participate in drawing up a list of ecologically and economically sensitive sites on the Scottish West Coast and Islands, both those with and without existing aquaculture units
- agree to the premise that no new aquaculture units should be permitted on sites identified on the above list, unless agreed with local wild fish interests/national wild fish organisations and operated within totally enclosed systems?
- agree in principle to participating in a project to relocate an existing unit identified on the above list, and monitoring the effects on wild salmon and sea trout runs, and the benthic ecology around the vacated site?

The Chief Executive also met MSS civil servants during the annual North Atlantic Salmon Conservation Organisation meeting in Canada on June 3, 2010, to discuss these issues. Although some interesting ideas were debated, no immediate action was confirmed, and no indication was given that the specific requests would be responded to.

There was a well-publicised (unsuccessful) petition in 2000 by Mr Alan Berry calling for a public enquiry into salmon aquaculture and its effects on wild populations. Throughout this period, there has also been very widespread media coverage highlighting the ecological dangers of salmon farming.

To date, not a single salmon farm in Scotland has relocated on environmental grounds. The industry is still largely 'self-regulating', with a voluntary Code of Good Practice and voluntary Area Management Agreements in some areas, all broken with impunity. Even the Aquaculture and Freshwater Fisheries Act 2007, which was supposed to tighten up on malpractice, relies on the fish farmers themselves to report escapes and, unsurprisingly, there has not been one single prosecution since it came into force in spite of several large escapes in the interim.

Finally, a recent review of the salmon farming industry's voluntary code of practice by the Scottish Salmon Farming Producers' Association has removed content concerning the impact of the industry on wild fish, leading wild fish interests to perceive that the issue is no longer a priority for the industry.

Petition background information

The impact of marine and freshwater salmon farming on wild salmon and sea trout has been an issue for more than 15 years. In that time, dialogue has taken place but very little progress has been achieved in halting the impacts which we list below.

In 1999, the then Scottish Executive bowed to pressure from wild fish organisations and set up the Tripartite Working Group (TWG), consisting of itself, wild fish interests and the salmon farming industry, with a remit "to address problems common to salmon farming and wild salmon fisheries and to seek solutions...." Key to its strategy has been the negotiating and setting up of local Area Management Agreements (AMAs) – 18 to date – between the relevant local players to foster initiatives such as the synchronised treatment of sea-lice within individual bays, together with the fallowing of farms, in an attempt to minimise impact on wild fish. However, these were never operated under any mandatory regulation and, ten years later, we do not believe that the TWG (with its

mantra of “building consensus, reaching agreement”) has actually achieved any tangible success. Indeed, there is a deep feeling within the wild fish lobby that the endless meetings, sub-group reports and mountains of paper have merely acted as a convenient forum to which both Government and fish farming industry can point to say that they are ‘talking’ about the issues, whereas nothing actually gets done about solving the issues – there is no trend in dropping sea lice numbers – indeed, there is growing evidence that sea lice might be becoming more difficult to treat – or in the ability of the industry to stop significant numbers of escaping farmed salmon.

In the great majority of the river systems in question there is absolutely no sign of any resurgence in salmon; and the situation with sea trout is simply dire.

The S&TA tries wherever possible to support its work with sound scientific evidence, and we have therefore recently undertaken a review (published March 2010) of some 137 scientific papers published over the past 20 years of peer-viewed research into this subject - a massive volume of literature both nationally and internationally (see link above in s4 to the full report on the S&TA web site). These include recent scientific papers, some of which have been written by leading Scottish Government fisheries scientists. They demonstrate through scientific evidence that the presence of farmed smolt units in freshwater lochs and the presence of seawater salmon farms close to the mouths of salmon and sea trout rivers can seriously damage indigenous salmon and sea trout populations—

- Sea lice parasites transfer from farmed salmon to wild fish. Although sea lice occur naturally in the marine environment, salmon farms provide the ideal conditions for their numbers to multiply to devastating levels. Sea lice feed on wild salmon and sea trout, causing lesions which can be fatal to juveniles.
- The location of salmon farms is often in sheltered bays and estuaries close to river estuaries and lochs with runs of wild salmon and sea trout. The wild fish migration paths run passed the farmed fish, resulting in maximum exposure to diseases and parasites emanating from the farms
- Fish farm escapees enter the natural environment if the farm cage nets are damaged by wave action or predator attacks, or poor husbandry operations allow fish to escape. These escapees breed with wild salmon, diluting natural gene pools. Over time, genetically distinct wild salmon populations could be lost forever, limiting the ability of the species to adapt to change such as global warming.
- Juvenile salmon are often farmed to smolt stage in cages in freshwater lochs, and escapees from these units can join wild smolts on migration, returning as adults to breed with wild fish and dilute gene pools. This form of fish farming is already prohibited in Norway, yet is still allowed in Scotland.
- Uneaten food and fish faeces drop out of the open cages and on to the seabed, smothering species below the cages and resulting in ‘dead zones’ on the sea bed, while the elevated levels of phosphates and nitrates (contained in the food) reduce surrounding water quality.
- Farms discharge untreated chemical waste, often laced with antibiotics and pesticides, directly into coastal waters. Once in the environment, these contaminants can accumulate in the natural food chain and could potentially impact humans.

To ensure a sustainable salmon farming industry, the Salmon and Trout Association calls for—

- The ultimate target of the industry and Scottish Government must be for the statutory use of enclosed systems for rearing fish, whether on land or at sea, therefore cutting out any interaction between farmed and wild salmon and sea trout. This should be within a timescale agreed between Government, industry and wild fish organisations
- Meanwhile, the Precautionary Principle (as enshrined in EU legislation protecting species and habitats) should be adhered to at all times
- An effective lice dispersal model must be developed in order to assess acceptable maximum farm/area lice levels
- A list of ecologically and economically sensitive sites should be drawn up immediately

- Sea-based salmon farms must be moved away from locations with significant salmon and sea trout migration runs, within estuaries, lochs and offshore. As a practical start, an experiment should be conducted by removing an individual farm from a sensitive site - agreed with wild fish organisations - and the effect on wild salmon stocks monitored
- No new sites should be permitted in sensitive areas highlighted by the list above
- New fish farm applications must be supported by independent Environmental Impact Assessments
- Salmon smolt farms should be banned from operating within any wild salmonid river, unless in a totally enclosed system that stops any interaction between farmed and wild fish.
- The impact of escapees should be reduced by the mandatory stocking of sterile fish within an agreed timescale.

I would like the PPC to ask the Scottish Government why it is allowing—

1 the destruction of salmon and sea trout stocks on the west coast of Scotland by continuing to allow salmon farms to operate to a standard that scientific research shows is extremely damaging to wild fish stocks and the environment? Whereas other countries operate aquaculture units under Government regulation, the Scottish industry mainly operates under a voluntary code of practice, without serious sanction for malpractice.

2. the siting of salmon farms on freshwater lochs that are connected to salmon rivers, even though the scientific evidence shows that there is the potential for massive damage to local native salmon stocks (this practice is banned in Norway)?

3. internationally based fish farm companies to operate in Scotland under less stringent environment constraints than in their home countries?

Salmon & Trout Association web site - www.salmon-trout.org

Unique web address

<http://www.scottish.parliament.uk/GettingInvolved/Petitions/PE01336>

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NO

How many signatures have you collected so far?

16000

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