

PE1336/E

## RESPONSE FROM THE SCOTTISH SALMON PRODUCERS' ORGANISATION TO PUBLIC PETITIONS COMMITTEE OF THE SCOTTISH PARLIAMENT

*“Wild Atlantic salmon populations have been in decline throughout their natural range since the early 1970s, thought mainly to be due to reduced oceanic feeding opportunities related to climate change.”*

*Salmon and Trout Association, March 2010*

### General Comments

The Scottish Salmon Producers' Organisation (SSPO) welcomes the opportunity to respond to the Public Petitions Committee (the Committee) on Petition PE1336. However, we are dismayed that a petition so wholly ill-founded and ill-informed in its fundamental basis of fact should lead the Committee into an exercise of addressing supplementary questions deriving from the flawed premise on which the petition is mounted.

Respecting the Committee's wish for brief responses, we have limited our comments but are very happy to provide further detail in writing or indeed in oral evidence at any time.

**The basic facts are these. According to the official statistics, the decline in Scottish salmon catches has been with us for over 40 years; and, over this period, salmon catches on the east and west coasts of Scotland have declined to the same extent, approximately 82%<sup>1</sup>. Salmon farming developed well after the decline in wild stocks had become well established and salmon farming is located entirely on the west coast.**

We recognise that the petitioners' comments provide the industry, public agencies, local government and national government with the, possibly intractable, challenge of seeking to address the unfounded views of a disaffected group who, wrongly, feel they have a grievance. The Salmon & Trout Association (S&TA) website indicates it is a London-based organisation with a 'UK-wide membership of game anglers, fishery owners/managers, affiliated trades and members of the public'. We, therefore, have assumed that the underlying 'grievance' relates to sports angling and to S&TA's view that its anglers (or commercial owners of fishing rights) should 'catch more fish'. We would simply note that, as a result of the massive reduction in salmon netting, total rod catches in Scotland have more than doubled since the 1950s and have never been higher than at present.

Excellent quality Scottish farmed salmon is now widely available at affordable prices. Thus, the only real justifications for sports salmon fishing is either the pleasure (at least for the angler) of hooking, playing and landing a large iconic game fish, or the related financial benefits to owners of fishing rights and to local visitor and tourism businesses. We would not support a ban on salmon angling but we do believe that Scotland's wild salmon resources should be strategically managed in the national interest. This requires improved national oversight of river management, fishing and salmon stock management.

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<sup>1</sup> Marine Scotland Annual Surveys  
Petition 1336 –

## Response to the Petitioners' Nine Points

We are struck by the fact that the S&TA's briefing paper, "Impacts of Salmon Aquaculture on Native Salmonids (*sic*) Fisheries and the Aquatic Environment" on which this petition is founded, selectively quotes literature from international studies, only a small number of which has any relevance whatsoever to Scottish waters.

**Point 1:** There would need to be a very good reason for the industry to consider this option and nothing in the petition provides such a reason. A published, independent report "Closed Containment Systems for Farmed Atlantic Salmon in Scotland", commissioned for SSPO in 2009, clearly demonstrates that closed containment has negative implications for fish welfare and is environmentally unsustainable.

**Point 2:** Invocation of the Precautionary Principle is only relevant when there is insufficient information to allow informed decision making. Decisions relating to the aquaculture industry in Scotland are based on scientific and other information, and the processes and procedures followed are in compliance with relevant EU, UK and Scottish legislation.

**Point 3:** Research to inform the management and control of lice is well developed in Scotland and the results are being practically applied. This includes a range of different, predictive models developed in collaboration between industry and independent academic researchers. A comprehensive system of farm management areas, which takes account of practical, local experience of lice dispersal, is already in place encapsulated in the industry's independently audited Code of Good Practice for Scottish Finfish Aquaculture.

**Point 4:** Regulatory criteria for the siting of salmon farms already take full account of ecological and other environmental issues. The most obvious example of this is the requirement for Environmental Statements in support of the siting and operation of fish farms.

**Point 5:** There is no evidence to support the S&TA's opinion that the proximity of salmon farms has a detrimental effect on migratory fish *per se* in Scottish waters. Indeed the Scottish catch statistics and the improvements in salmon through river and stock management in locations where fish farms are located argue the contrary.

**Point 6:** All new sites require full Environmental Impact Assessment and must meet all environmental and natural heritage legislation.

**Point 7:** There is already a legally binding process in place in relation to Environmental Impact Assessments and new fish farm sites. This is independently assessed (on different aspects) by the Planning Authority, SEPA, SNH and Marine Scotland.

**Point 8:** There is no evidence to support the S&TA's opinion that the existence of salmon smolt farms has a detrimental effect on wild fish in Scottish waters. A published, independent report "Closed Containment Systems for Farmed Atlantic Salmon in Scotland", commissioned for SSPO last year, clearly demonstrates that closed containment has negative implications for fish welfare and is environmentally unsustainable. It is anomalous that S&TA is calling for such measures when it appears unconcerned about the deliberate restocking of rivers and lochs with salmon, sea trout, brown trout and rainbow trout by angling organisations and owners of fishing rights.

**Point 9:** Technology does not currently exist to allow the use of sterile fish in commercial salmon aquaculture. In the event that this becomes possible in the future the use of sterile fish may present significant risks to the wild fish sector which do not currently exist.

## Comments on Action Points of the Petition

The S&TA campaigning is based on the premise that salmon farming always has a negative impact. Its assertion is that where salmon farming takes place, salmon farming alone is, and has been, responsible for observed declines in stocks and catches of wild fish. This contrasts markedly with the S&TA's published views which are that "Wild Atlantic salmon populations have been in decline throughout their natural range since the early 1970s, thought mainly to be due to reduced oceanic feeding opportunities related to climate change"<sup>2</sup> based on scientific analysis and reporting of the declines.

But the simple facts are that **the official statistics show that salmon farming started long after the decline in Scottish salmon catches became well established and that salmon catches on the east and west coasts of Scotland have declined to the same extent, approximately 82%**<sup>3</sup>. **Salmon farming is located on the west coast but not on the east coast.**

It is surprising, therefore, that S&TA should choose to ignore selectively the fact that pressures on wild salmon stocks arise as a consequence of changes in the deep oceans rather than in the Scottish inshore lochs and waters.

The Code of Good Practice for Scottish Finfish Aquaculture is overlaid above and beyond the comprehensive suite of regulation and legislation that governs salmon farming in Scotland. The fact that the S&TA seems unaware of this, and the content of the Code, does not mean that it does not exist or operate effectively. Both the legislation and the Code of Good Practice were subject to extensive public consultation, so it is surprising that the petitioners have chosen to misrepresent its content and relevance.

The S&TA's own reference list in their briefing paper, "Impacts of Salmon Aquaculture on Native Salmonids (*sic*) Fisheries and the Aquatic Environment" fails to cite any references to actual damage relating to Scottish experiences.

The environmental regulatory standards in Scotland are deemed by industry, NGOs and the Scottish regulators to be significantly higher than any other part of the world where salmon farming operates.

This response also reflects the views of Shetland Aquaculture and is submitted for the Committee's consideration as a joint submission. The organisations are happy to provide any further information for the Committee in its consideration of this petition.

Scott Landsburgh – Chief Executive  
Tel : +44 (0)1738 587000  
Email : enquiries@scottishsalmon.co.uk

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<sup>2</sup> Friedland and Reddin 1993

<sup>3</sup> Marine Scotland Annual Surveys