Overview

The Institute of Aquaculture is one of the largest academic organisations dedicated to the study of aquaculture, worldwide. The Institute carries out world-class research, and provides advise to governments, public bodies and industry. The Institute recognises the growing importance of aquaculture in many countries, and is fully supportive of the Government’s aim of increasing aquacultural production in Scotland. However, I am not convinced that the Aquaculture and Fisheries Scotland Bill will achieve its goals. I believe that certain parts of the Bill would benefit from revision. Principally:

1. As a general comment, the Bill is vague and lacks specifics. One concern is about who has the responsibility for providing the detail, for example, deciding which comprise commercially damaging species [Chapter 3]. If the detail is to be delegated, what controls will be put into place to overseas such delegated powers?

2. **Fish farm management agreements and statements [Sections 1, 4A and 4B]**. These need to apply to all coastal aquaculture in Scotland, and must be flexible thereby permit rapid responses to the changing situations as might apply to any farming activity.

3. **Escapes [Sections 2 and 5A]**. This is an emotive issue, and if I understand the narrative correctly escapes would trigger a response across the whole industry. This is an excessive use of resources, and would be better restricted to sampling fish farms within specified and defined areas. I am curious [Section 5A] as to the meaning of “material from fish” – “fish tissues” should suffice. However, the reasons for collecting tissues need to be controlled and restricted to the investigation into a specified event.

4. **Technical requirements for equipment used in fish farming [Chapter 2, Section 3]**. What equipment [paragraph 1A]? This needs to be made more specific otherwise interpretation is going to cause unending problems. Is “fish farming” intended to be restricted to salmon or does fish include shellfish?

5. **Commercially Damaging Species [Chapter 3]**. This part of the Bill gives me the greatest concern, and I am unclear about what exactly is a commercially damaging species in terms of salmon aquaculture unless it is the intention of the authors to include pathogens and parasites that could affect health. However in terms of shellfish culture, I am aware of the damaging effect of predation such as by crabs. In short, this section needs more work.

6. **Fixed Penalty Notices [FPN]**. I could foresee FPNs causing issue with the aquaculture industry. Are they really needed and will they achieve their aim?

We have an excellent product in Scottish salmon, which is well known and respected in an increasing number of countries. There is increasing demand from the Far East, which I hope the aquaculture industry will be able to fulfil. Let us not discourage the development of this Scottish agricultural success story.