Supplementary written evidence from the Scottish Salmon Producers’ Organisation

KEY POINTS

- Fish farming industry is a strategically important asset for Scotland, the UK and EU. Further expansion of fish and shellfish is an EU/UK policy priority.

- The ex-farm value of Scottish farmed salmon in 2011 was £585m. (UK wild marine fish landings in Scottish ports were valued at £406m). Overall economic impact of salmon farming is estimated at over £1,300m per annum.

- Scottish salmon and sea trout angling make virtually no contribution to food supply or food security, but it has an indicative current value estimated as £95-100m. A figure of £12-13m has been estimated for the areas of Highlands and Islands where salmon farming also takes place.

- Twelve wellboats routinely operate in Scotland, with two additional vessels being contracted for occasional use. The majority of these vessels are Norwegian built.

- The fish farming industry attracts a small number of anti-farming groups, who claim to represent environmental interests, wild fish interests, or anti-corporate interests, often in combination. Like many other sectors of the food industry, the fish farming sector addresses this campaigning through its own retailer and consumer communications.

- We have concerns that anti-fish farm campaign groups aim to undermine the role and authority of Scottish Government and the Scottish regulatory agencies. We also believe that campaigners’ demands on public bodies represent a drain on public expenditure.

- We interpret ‘interactions’ between fish farming and wild salmon fisheries to mean biological interactions between wild fisheries and farms and vice versa.

- In the context of stock status in the North Atlantic, the evidence indicates that salmon farming has had no significant or long-term effect on wild Atlantic salmon. Over recording periods ‘pre-salmon farming’ and ‘post-salmon farming’, each of more than 30 years, the total wild salmon catches in the area of Scotland where salmon farming is located have been consistently approximately 10% of the total Scottish catch.
• Nonetheless, salmon farmers remain committed to working with wild fisheries managers to mitigate potential impacts on wild fish; and to address concerns about risks to farm fish from wild stocks.

• We have already made a proposal to modify the existing publication of area-based farm sea lice information to support closer working with local fisheries. We believe this information must be matched by wild fish information supplied by fisheries managers on a local basis. This will underpin an integrated local ‘Fisheries Area Management’ approach, which we believe would offer significant benefit to both farm and fisheries managers.

• We have commented specifically on the shooting of seals to provide information which may not have previously been available to members of the committee.

INTRODUCTION

At the conclusion of Rural Affairs, Climate Change and Environment Committee meeting on the 5 December it was indicated that supplementary written evidence would be welcomed. Against that background, the SSPO wishes to provide additional comment on selected topics relevant to the Committee’s deliberations, and we remain at the Committee’s disposal with respect to requests for further information.

STRATEGIC ASSETS OF SCOTTISH AQUACULTURE

Globally, farmed fish production now exceeds the catch of wild fish and provides over half of the total amount of fish consumed by humans. The Food and Agriculture Organisation of the United Nations has concluded that further expansion of the aquaculture sector is critically important if we are to meet future requirements for fish and safeguard food security (1).

Both the UK and EU are substantial importers of fish (the EU is only ca 35% self-sufficient in fish supply). Therefore EU and UK markets are vulnerable to reductions in fish supply and increasing fish prices. The EU now has a clear policy to grow and develop aquaculture production (2). This will be implemented through the Common Fisheries Policy. Member States will each be required to adopt strategic multi-year plans for expansion. Scotland’s Draft National Marine Plan (3) can be seen as a first step in that process: it is an acknowledgement that aquaculture is one of Scotland’s key assets and that there is scope for its further development, subject to a competitive economic environment for capital investment.
ECONOMIC ASSESSMENTS AND WELLBOATS

Economics

This section is written in response to the Convenor's question of 5 December 2012, when he asked “What are the economic benefits of salmon farming and the wild salmonid fisheries respectively”.

The UK is the third largest producer of farmed fish and shellfish in the EU (behind Spain and Italy), with more than 80% of UK aquaculture production coming from Scotland. Scottish total aquaculture production in 2011 was 170,762 tonnes comprising 7,285 tonnes of shellfish and 163,448 tonnes of finfish. Farmed finfish included Atlantic salmon, rainbow trout, brown trout, halibut and Arctic charr. However, at 158,018 tonnes, farmed salmon dominated and made Scotland the third largest farmed salmon producer in the world. The farm gate value of salmon was £585m (for comparison, UK-vessel fish landings in Scotland in 2011 were valued at £406m). Taking account of upstream and downstream businesses, the aggregate economic impact of salmon farming is estimated to be over £1,300m per annum.

In contrast to salmon farming, sport fishing for salmon and sea trout in Scotland makes virtually no contribution to food supply or food security, although it has economic and social value. There are no publicly accessible records of fisheries proprietors and occupiers, no formal recording of angler effort, and no reporting of income from fisheries in Scotland, so it is difficult to assess the contemporary economics of Scottish salmon angling with any precision. The Homarus report (2008) (4) suggested that ‘few proprietors appear to keep good records of income generated by their fisheries’. The most comprehensive data available is arguably that of Radford and his colleagues (5) based on a 2003 survey of anglers’ ‘total visit’ expenditures. That analysis indicated anglers of all types spent a total of £113m per annum in Scotland in 2003, and that £73m was accounted for by salmon and sea trout anglers. Allowing for inflation it is reasonable to estimate the current economic value of the salmon and trout sector as £95-100m. A regional analysis (4) suggests that around 12.5% of this income, amounting to £12-13m, is generated in the areas of the Highlands and Islands where salmon farming is also located.

Wellboats

SSPO holds no detailed information about wellboats operating in Scottish waters. However, industry enquiries suggest that there are currently 12 boats permanently working in Scotland with a further 2 boats contracted (from Norway) on an occasional basis. Of the 12 permanent boats two have been retrofitted, we believe in Scotland. The remaining boats are suggested to have been constructed in Norway.
INTERACTIONS OF FARMED AND WILD FISHERIES

In the meeting of 28 November the Convener indicated that part of the intention of the bill was to address ‘interactions’ between fish farming and wild fisheries. We interpret this as meaning the biological interactions between wild fisheries and farms and vice versa, and we have commented on that below. However, some of the discussion on the 28 November referred to the ‘media’. We therefore wish first to comment on that aspect.

Media Campaigns

Despite its huge national and international success and its very wide public acceptance (6), the aquaculture sector attracts the attention of a range of anti-farming campaigners. These individuals and organisations variously campaign from the standpoint of environmental interests, wild fish interests, or anti-corporate interests, often in combination. As an example, since 2010, Guy Linley-Adams has headed a major media campaign led by the Salmon & Trout Association (S&TA) designed to drive salmon farming into land-based closed-containment farming systems. Likewise, Don Staniford of the Global Alliance Against Industrial Aquaculture (GAAI) has campaigned against ‘salmon, shrimp, tuna and ‘Frankenfish’ farming’, evidently with the aim of closing down all fish farming in Scotland and elsewhere. For information, Canadian Supreme Court Judge, The Honourable Madam Justice Adair, recently said “I have concluded Mr Staniford is akin to a zealot. Virtually anything that conflicts with his view and vision is wrong, bad, disgraceful or worse. He is highly suspicious. Neutral facts…will lead him to jump to irrational conclusions.”(7) These campaigns have showered the Scottish Government and regulatory agencies with demands for information under FoI or EIR followed by press releases which attempt to erode retailer and consumer confidence in aquaculture and impugn the reputation of individual farming companies. For campaigners of this type, this ‘legitimate lobbying' to gain ‘consumer-traction' is a normal tool of the trade. Like many other sectors of the food industry, the fish farming industry addresses this kind of campaigning through its own communications with retailers and consumers. We have concerns that the lobbying and campaigning is aimed to undermine the role and authority of the Scottish Government and Scottish regulatory agencies and we also believe that dealing with campaigners’ demands represents a substantial drain on public expenditure. However, we do not believe the campaigning can be or could be addressed by legislation and it should therefore probably not be a focus for the Committee’s considerations.

Biological Interactions

Regional Analysis

The marine aquaculture industry is located only on the North West mainland of Scotland and in the Western and Northern islands. These areas historically have been responsible for about 10% of the total Scottish catch of wild salmon by netting
and rod-angling. This figure has not changed significantly between catch records in the 1950s and the present day (commercial salmon farming began in 1980). Likewise, for both salmon and sea trout, the evidence from total catch statistics is that salmon and sea trout catches have varied very similarly in both the fish farming area and elsewhere in Scotland (8). As a result of climate-related changes since 1970, there have been reductions in total salmon stocks across the whole Atlantic Ocean range; and, like other countries which count Atlantic salmon as part of their indigenous fauna, these have been experienced in Scotland. Additionally, there have been changes in the balance of catch between net-fisheries and rod-angling, which have differed between areas of Scotland: in particular the decline of netting stations on the east coast has released a larger ‘reservoir’ of fish into the rivers for angling. Scottish angling catches overall have increased substantially over time, despite the overall pattern of decline in wild stocks.

Thus as statements of fact: (a) if it was true that there were any regional impacts of marine fish farming, such impacts would be confined within the 10% of the total Scottish stocks associated with the farming areas; (b) the catch data indicates that there has been no impact of farming on reduction of stocks at a farming-area level; and (c) Scottish angling catches have increased, substantially despite the overall reduction in salmon stocks in all parts of Scotland.

**Scientific Evidence**

We would be happy to consider the scientific evidence on sea lice and escapes with the RACCE Committee. However, our impression is that such detailed consideration would not necessarily provide the inputs the Committee is seeking. Suffice it to say that the overall evidence is that: (a) overall mortality of outwardly migrating wild salmon is typically 95% (9, 10); even in the worst case scenario coastal sea lice (which are always present in coastal regions even in the absence of salmon farms by virtue of the presence of wild salmonids, their natural hosts) may account for only 1-2% of this figure (9, 10); (b) there is no evidence that this mortality is any greater in fish farming areas; and (c) there is evidence that farmed-fish escapes at the level experienced in Scotland have no significant effects on wild fish populations (11, 12, 13).

**Fisheries Area Management**

Notwithstanding the fact that there is no evidence of regional effects, some wild fisheries managers continue to have concerns about potential local impacts of salmon farming on wild stocks; and unless these can be properly identified, quantified and characterised they cannot be addressed or managed. Salmon farmers are keen to work with local fisheries managers both to manage any potential impacts of farming on wild fish and to meet farmers concerns about risks to farm fish from wild stocks. Significant progress on joint working was made during the period when the Tripartite Working Group was in operation, and some groups continue to work
effectively as local forums. However, we believed there is need to re-establish a comprehensive framework which will not only provide fisheries managers with information on local fish farming but will also provide farmers with information on the local fisheries, which is currently not accessible. The Scottish salmon industry already publishes information on sea lice management and control, and SSPO has recently made a proposal, which includes the provision to publish enhanced area-based farm sea lice information, to be brought together with wild fish data supplied by fisheries managers on a local area basis. This would provide for an integrated local ‘Fisheries Area Management’ approach, which we believe would offer significant benefits to both farm and fisheries managers. It would provide local evidence and experience, which is likely to be more trusted and persuasive than extrapolations from the scientific literature, and it would address the need to achieve hard information on which to base management actions by either sector.

OTHER POINTS

We were dismayed by the views of Richard Lyle, MSP (12 December) on the ‘dislike’ of fish farmers for seals. We wish to make the point that these comments are wholly without foundation. For the sake of clarity, fish farmers have a legal duty under the Animal Health and Welfare (Scotland) Act 2006 to safeguard their stock from predation. To this end they invest heavily in tension netting, seal deterrents and other devices, having due regard to planning restrictions in some areas, to industry best practice and local experience. It is a matter of record that the aquaculture industry is permitted to shoot a strictly limited number of seals as a last resort, under licence. The Scottish Government reported that in the first 6-months of 2012, 105 seals had been shot across 230 fish farms. As a point of reference, for wild fisheries, where fish are wholly excluded from any animal health and welfare legislation, 137 seals were shot across 40 fisheries and netting stations to protect the commercial value of the wild salmon stock.

REFERENCES


