RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM ANDREW BRADFORD, KINCARDINE ESTATE, ABERDEENSHIRE

1. Do you have any general views on the current state of the farmed salmon industry in Scotland?

Yes. I note that Fisheries Management Scotland believe a successful and sustainable salmon aquaculture industry should be defined as:

- 1. An industry that operates alongside wild salmon and sea trout populations and other species without negatively impacting them
- 2. An industry which has negligible environmental impact through pollution, degradation or habitats or disease/parasite transfer
- 3. An industry that inspires confidence and loyalty by communicating openly and transparently with stakeholders and the public.

At present it is very clear that the Scottish Salmon Farming industry fails on all three counts. I look forward to the RECC taking the necessary action to bring about compliance with these standards.

2. There have been several recent reports which suggest how the farmed salmon industry might be developed. Do you have any views on action that might be taken to help the sector grow in the future?

A move to RAS would address most of the problems identified with salmon aquaculture leaving the issue of sustainable feed supply to be resolved. This would also have to be tackled if cage-net farming were to be increased and so is not an additional imposition resulting from a move to RAS.

RAS is undeniably more expensive and uses more energy. Cost is not a defence for a system that so evidently is harmful through pollution, infestation etc.

Energy issues can be addressed by using renewable energy.

3. The farmed salmon industry is currently managing a range of fish health and environmental challenges. Do you have any views on how these might be addressed?

Yes. A move to RAS seems to be the obvious solution causing far lower impact on the environment.

4. Do you feel that the current national collection of data on salmon operations and fish health and related matters is adequate?

No. It is quite evident from the SPICE briefing that more information is required.

5. Do you have any views on whether the regulatory regime which applies to the farmed salmon industry is sufficiently robust?

Yes. An industry that puts 48 million salmon to sea and lets 14 million of them die before the remaining 34 million can be sold; which continues to allow tens of thousands to escape into the wild with genetic harm potential to wild stock; which infests wild stock with sea lice; which release enormous quantities of pollutants and faeces untreated into the sea etc. has clearly not got it right. I'm sure voluntary codes etc strive to right some of these ills but clearly they are not adequate and morerobust regulation is required.

6. Do you have any comments on how the UK's departure from the European Union might impact on the farmed salmon sector?

Yes. Sensibly managed the transition should not cause any problem. However if regulators seek to achieve political ends then I can see all sorts of problems.

Andrew Bradford March 2018