Do you have any general views on the current state of the farmed salmon industry in Scotland?
The current state is worrying from a fisheries perspective. New farms are appearing everywhere and farms that are already in use are expanding. Almost all applications made to the councils are approved, even when many objections are raised from local residents, environmentalists and fisheries. There is competition for space between aquaculture and fisheries. The locations the salmon farms use, protected in inlets, are often rich fishing grounds or safety areas for fishermen in bad weather. When farms are put in these areas, fishermen are forced to work outside these protected areas, losing important fishing grounds and creating dangerous situations. This doesn’t seem to be acknowledged as the Scottish aquaculture strategy aims to double the economic contribution and number of jobs by aquaculture before 2030.

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?
Better collaboration with other stakeholders and development of farming techniques. Combining aquaculture with windfarms or moving into non-fished areas would release pressure on other stakeholders like fishermen. Other possibilities would be reducing moorings, moving further inshore or even on-land farms.

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?
Fish health problems are caused by high stocking densities and are increased by having a large number of farms close to each other. Solutions would be:

- Locating fewer farms in a small area. E.g. at least 5 km between each site.
- Fewer cages per site;
- Lower stock density per site;
- Moving onshore (no more exposure to e.g. wild sea lice).

Another problem is non-eaten food and fish manure accumulating under the cages, causing a dead-zone. A solution would be:
• Mandatory waste-eating species like sea urchins under the cages. Later also add seaweed (and other species) to make a complete Integrated Multi Trophic Aquaculture system.

When farms are removed, the grounds underneath and close-by are depleted. Scientific research has shown that it can take years before the ground under farms are fully recovered. The seabed is certainly not recovered after the standard falling period. A solution would be:

• Increase the falling time.

Do you feel that the current national collection of data on salmon operations and fish health and related matters is adequate?
There is rarely any data available on the effect aquaculture has on fisheries, so in that case the national collection of data is not adequate.

Do you have any views on whether the regulatory regime which applies to the farmed salmon industry is sufficiently robust?
It doesn’t seem robust as general marine regulations don’t seem to apply for fish farm operators. Their seabed surveys close off areas without updating other marine users beforehand; updates are circulated only after everything is put in place.

Do you have any comments on how the UK’s departure from the European Union might impact on the farmed salmon sector?
N/A

The Scottish White Fish Producers Association Ltd and Mallaig & North-West Fishermen’s Association
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