

Environment, Climate Change and Land Reform Committee

Environmental impacts of salmon farming

Written submission from John McInally

Objection to Fish Farms in Scotland

The organic waste, pesticides and sea lice larvae released by inshore fish farms are harming the environment, threatening wild salmon and sea trout and the creel fisheries which are vital to many communities on the west coast of Scotland.

SEPA's own figures, published in The Sunday Herald, show that 45 sea lochs have already been polluted by fish farm pesticides from the existing number of farms, at their current maximum size.

There would be huge benefits of moving these fish farms offshore at least 3 nautical miles from any coast, and if existing fish farms are moved away from the sensitive sites they currently occupy.

Even then, wild salmonids would only be relieved of the burden of sea lice if these farm locations were not sited on their migration routes away from Scotland, which are currently unknown.

A much better solution would be making all fish farms closed-containment onshore. The strong currents at offshore sites would move much of the pollution way from the immediate area of a fish farm but that does not mean it would be harmless. The recent PAMP2 study has shown that pollution is still harmful when the computer models used by SEPA predicts that it would not be. SEPA's new computer model for high energy sites only considers the dispersal of waste and emamectin benzoate up to 1km from a fish farm centered in the modeled area, disregarding it after it leaves the area, even though much of it could return when the tide changes. How would it model the cumulative effect of other mega-fish farms just over 1km away? Computer models are far from perfect at predicting complex, turbulent environments.

The Scottish Government accepts the scientific evidence that sea lice from captive fish harm and kill wild salmon and sea trout in Scotland. Some high energy sites are not far from shore and allowing larger fish farms there would put wild salmon and sea trout in even greater danger of sea lice infestation. In the past SEPA have said that these wild fish are the sole responsibility of Marine Scotland but all Government bodies are legally bound to enhance and protect biodiversity, and to adopt the precautionary principle when there is doubt about the effect of their actions. Wild salmon and sea trout are a valuable resource, attracting anglers to spend money in rural areas.

Larger numbers of fish could escape from larger farms, carrying diseases to wild fish and causing harm by interbreeding with them. I further object to the proposal to remove the 2500 tonne cap on fish farms, unless all fish farms are moved more than 3 nautical miles offshore.

I agree that SEPA, rather than the industry, should be responsible for collecting data on the impact of fish farms on the environment and it should be resourced properly

to do so, by a levy on the industry it regulates. SEPA should routinely prosecute offenders and revoke their

CAR licences if they repeatedly breach their terms, forcing a prolonged break in production at that site.

The sea is a common resource. Aquaculture is the only industry allowed to discharge large amounts of waste and toxic chemicals into it. This is not sustainable or responsible behaviour.

Fin fish farming must move to closed-containment and the removal of all its waste for safe disposal.

John McInally