

## **Environment, Climate Change and Land Reform Committee**

### **Environmental impacts of salmon farming**

#### **Written submission from Christine Richards**

I am writing to express my extreme concern about the current state of the Aquaculture Industry in Scotland and also the unseemly haste in which the Scottish Government are supporting a massive increase in this Industry without due recognition or resolution of the current issues which have, and are continuing to emerge. To continue, and enlarge Aquaculture in its current state would appear to be an inadvisable and potentially very damaging step to take.

It is stated that a system of "Adaptive Management" is used - there are ambiguities inherent in this approach as unique definitions and expectations can differ between the respective parties involved and does not give me any confidence that this method will achieve a positive outcome. Up to the present time, it would appear that, with this methodology, there are a multitude of issues with no positive resolutions offered. Perhaps a more co-ordinated, and proactive approach from the different agencies would be preferable.

The main issues that I am concerned about are as follows;

- Pollution by the discharge of thousands of tons of effluent
- Sea lice - Affecting wild salmon and trout. This is already a massive issue which has, as yet, been not resolved but is increasing. Any expansion of the industry would inevitably exacerbate this issue
- Other infectious diseases
- Treatment with toxic chemicals ie emamectin benzoate - proven to be harmful to crustacea
- The rather dismissive attitudes towards MPAs. It is evident that these are not being protected in the true sense of the word. No fish farms should be allowed in these areas - particularly when it is known that these will have adverse effects.
- The impact on existing and future sustainable local jobs, particularly in angling, tourism and creeling/scallop diving. Discharging pesticides that are especially poisonous to crustacea into areas used by creel fisherman to catch crabs, lobsters and prawns is extremely irresponsible.
- Harm to the animal community, including effects of Acoustic Deterrent Devices
- Shooting of seals - I object to the word "predators" which is used in regard to seals and believe that this inhumane practice should be banned.
- Tourism, which is of far more importance to the Scottish economy, will suffer, if these Fish Farms are allowed to spring up in some of the most beautiful wild areas on the West Coast of Scotland. Not only will there be a diminishing seal, porpoise and dolphin population (therefore employment in wildlife tourism will suffer), but tourists and local populations will be deprived of many of the beautiful and peaceful locations. This will also apply to the Yachting fraternity - again this will mean a further reduction to the local economy.
- Employment - A figure of 12,000 employed in the Aquaculture Industry is often quoted in the press and also in debates in the Scottish Parliament. This

figure contradicts the information on the Scottish Government website (which is based on information provided by the Aquaculture industry), which gives a figure of 2,000. It is my belief that this figure would be far outweighed by the numbers of people in activities who would be affected by this proposed expansion.

To conclude, fish farming has already expanded rapidly in the last decade or so and this fast expansion has generated the enormous problems with sea lice and disease, which are lethal for the caged fish and which can also infect wild fish with similarly catastrophic results. The Scottish Government has a moratorium on all fish farming on the north and east coasts of Scotland, stating that this is as a precaution to protect wild, migratory fish. If such a precaution is necessary there, why not on the West Coast, where the wild fish are in steep decline, compared to the same species in the east?