

## Environment, Climate Change and Land Reform Committee

### Environmental impacts of salmon farming

#### Written submission from The Highland Council

**SAMS report notes** (based on chapters 2 & 7 mainly but see 8 for the Norwegian way)

#### General points:

- Very useful, comprehensive report.
- Could do with a section on how it is, unsatisfactorily, left to the planning authorities to try and 'control' the environmental impacts of sea lice on wild salmonids through the planning system.
- Highlights the much of the monitoring is self-reporting e.g. on seals shot, lice data, predations levels, which leads to mistrust and inability to fully assess likely impacts of a development.
- Lack of site-specific reporting.
- Still focussing on non-Scottish data yet (p.12) .... Yet finally (p. 128) notes, unsurprisingly, the issues found in Scotland are comparable to those in Norway! Who knew? At last, recognition that same issue with same species leads to same impacts...in Scotland. Wow! This means therefore, there is no good reason to not publicly supply the data we need to better assess the environmental impacts e.g. sea lice data, as per Norway.

#### Questions:

1. Why are our statutory consultees on wild salmonids not here i.e. DSFB or FMS?
2. There is off-repeated government support for the ever-increasing targets for the salmon industries growth, but this appears to be based on a complete lack of any Sustainability Appraisal, as would be expected for such a topic given the significant environmental impacts and concerns. It seems to be accepted as fact without any consideration of the impacts (similar to SEPAs approach to DZR changes). The government should therefore undertake a SA before committing that support, which should include:
  - a. an HRA of the Natura sites, particularly in relation to the Minches cSAC, given the high proportion of fin fish farms in this area; [Status of Natura sites post-Brexit?]
  - b. the sea lice issue re impacts on wild salmonids and ;
  - c. the use of wild-caught cleaner fish.
3. Why is there no regulation of cleaner fish use given the current controls over salmon farming?

#### ADD Dilemma:

Can use a condition to ban their use to protect the porpoise and other cetaceans; the report highlights it is very unclear if they are even effective, so would not be such an

issue. However, if we did that, this may increase the need to shoot seals, thus affecting other protected species.

Crumb of comfort: We are starting to require more careful monitoring/use of ADDs through use of planning conditions, in consultation with SNH.

**Sea Lice Dilemma:**

No clear guidance from MSS – they need to use word ‘object’ if they think impacts on WILD salmonids significant; they have a duty to so do, particularly where there is no DSFB coverage. Bring SNH back in to also comment on the issue i.e. re-write/scrape the MOU on this.

Crumb of comfort: Use of EMPs... not brilliant, but a start. Combined with site-specific data, that is publically available, would help us make better decisions.

**Bottom line:**

1. Need Scottish Government sustainability appraisal before further expansion supported by Scottish Government.
2. We need greater support from statutory consultees to address the sea lice issue.
3. MSS need to be transparent with the data they hold and provide opinion not just advice.
4. DSFBs should be more closely involved with MSS and the data provided.
5. The industry needs to provide site-specific data.
6. There should be less reliance on self-reporting.