

Environment, Climate Change and Land Reform Committee

Environmental impacts of salmon farming

Written submission from Loch Duart Ltd

We welcome the opportunity to provide a submission in reference to the recently published Review of the Environmental Impacts of Salmon Farming in Scotland and current inquiry. Our submission does not seek to comment on the detail of the review paper, in part due to the timescales allowed, but does provide some of our overarching views which we would welcome the opportunity to provide more detail on if requested.

As a Scottish salmon producer we recognise that, like any form of human activity, salmon farming is not without its challenges. Loch Duart do however note that areas of the review paper imply that specific negatives such as under-reporting of escapes and farm-origin of sea lice larvae which we believe may be questionable, and certainly are highly sensitive, statements. We also feel that improvements made in many areas of this young industry such as regulatory relationships, environmental compliance and fish health management are not well captured at this stage in the process. So while we fully support the scientific, methodical approach intended by the review and inquiry, we ask that neutrality be carefully maintained especially around what have become highly emotive subjects for those opposed to salmon farming in Scotland. It is essential that realism, science and fact drive and inform the debate and not the use of highly emotive language.

We also ask that the full picture be properly assessed with regards to each environmental impact outlined; for example, while proper management of cleanerfish fisheries is vital for both industry and the wider environment, the environmental benefit of biological sea lice control also needs to be considered. As a company successfully utilising cleanerfish on all of our marine sites we have seen reductions in sea lice levels and medicine usage, accompanied by reduced cleanerfish stocking rates as we continually advance our knowledge of biological control methods.

Diversity within the Scottish salmon sector also needs to be taken into account; the scale, environmental conditions and practices are not comparable for every farm or operator, which is both a strength of the industry and an important factor to be considered by the inquiry. Cited mitigation measures such as RAS, physical lice treatments and genetically modified fish are not one-size fits all solutions, and other equally viable innovations should be acknowledged. Smaller operations such as ours have different challenges and possible solutions than those advocated by the larger more industrial producers – legislation and governance needs to allow many and varied solutions to be used.

In conclusion, as a company passionate about what we do, how we do it and the communities we support in the Highlands and Islands, we hope that a broadly positive and supportive view by the committee is taken. As an industry it feels that over-reliance by regulators on the precautionary principle has hindered innovation to better the sector, particularly with regards to key issues such as sea lice control, and while we are heartened by some recent changes in regulator relations we hope to see this continue to the benefit of all stakeholders. There is wealth of industry

experience and knowledge not yet captured within the process, and through improved collaboration between regulators and farmers this important resource could be utilised.