

Environment, Climate Change and Land Reform Committee

Environmental impacts of salmon farming

Written submission from Elanco Animal Health

Elanco provides comprehensive products and knowledge services to improve animal health and food-animal production in more than 70 countries. We value innovation, both in scientific research and daily operations, and strive to increase animal welfare, production and sustainability in aquaculture. Due to our experience in and commitment to particularly the salmon industry, we ask you to take into consideration the following points in regards to future regulation of aquaculture in Scotland:

- Healthy animals – including salmon – are the prerequisite for animal welfare. All efforts should be made to increase or maintain a high level of animal health where this has already been achieved.
- Increased animal health levels will also lead to fewer fish, which cannot be harvested due to mortality, and similarly fewer fish that are considered not suitable for processing for the human food chain due to diseases or lack of quality.
- This results in a higher number of healthy fish of good quality, which can be harvested sooner to produce the same amount of protein. Hence sustainability will be increased due to:
 - A reduced need for resources (like feed)
 - A decreased strain on the environment (less organic waste accumulating on the seabed, reduced quantities of veterinary medicinal products [VMPs], e.g. parasiticides needed)
 - A decreased CO₂ footprint
- Reduced illness and mortality benefits production and profitability, which enables investment in fish farming and coastal communities.

We especially want to note that innovative and novel VMPs, including parasiticides and vaccines, must be available to salmon producers and that no unnecessary market access barriers should be implemented. Several arguments underline this:

- The use of innovative VMPs and vaccines has led to a decrease in the use of antibiotics. A responsible use of antibiotics is essential to prevent an increase in antimicrobial resistance.
- It is important to view VMPs not only in terms of potential threats but also within a risk-benefit analysis framework, noting that risk management is defined by both threats and opportunities.
- Moreover, the potential threats and opportunities of new VMPs should also be seen in regards to their helping the lifespan and risks of existing products.
- Future regulation must enable and foster innovation to bring new aqua health products to the market, ideally more quickly than is presently possible. The current approval as well as continuous re-approval procedures and reporting

already lead to high costs. This results in less funds available for R&D and may, in fact, deflect investment by some animal health companies to more lucrative industries.

- The lack of access to aqua health products authorized in other European countries and further afield puts the Scottish industry at a disadvantage in protecting and maintaining animal welfare with consequent impacts on market competitiveness and employment.
- The availability of novel products, which could potentially play a role in controlling sea lice or viral diseases would also aid wild salmon stocks. An example for the latter comes from being able to treat farmed salmon with VMPs that are not affected by drug resistance thus reducing the parasite load in the environment.
- Scientific research and development at Scottish institutions has traditionally contributed to some of the major advances in salmonid health and welfare. Field testing and assessment of novel approaches to the management of disease in farmed fish is crucial to ensure that the farming and scientific sectors are able to make use of these advances.