

Environment, Climate Change and Land Reform Committee

Environmental impacts of salmon farming

Written submission from North Minch Shellfish Association (NMSA)

I am commenting on behalf of North Minch Shellfish Association (NMSA) which represents creel fishermen and divers who are primarily based in Ullapool and the small communities fringing the Wester Ross MPA and who fish predominantly within that MPA. There are currently two fish farms close to Ullapool, three sites in the Summer Isles and a site in Little Loch Broom (currently inactive). There are also a number of fish farm sites in Loch Ewe.

There is considerable local concern at present regarding applications to relocate sites in the Summer Isles and to increase the the permitted biomass by approximately 217%. In addition there is a potential application for a site slightly further south in the Summer Isles with a projected biomass of 2500 tonnes. The latter site has undergone screening and scoping.

Members already have concerns about the impact on the marine environment with current levels of production. They have issues with the chemical treatments used to combat sea lice and other diseases and anti-fouling chemicals as well as the general depositing of faeces and food. As the report makes clear there is insufficient knowledge and data about the impact of many of these chemicals on the marine environment and where there is scientific information it generally indicates that there are deleterious effects on marine organisms including those they fish for and the food chain that their catch is dependent on. Many of these chemicals have been shown to persist in the marine environment. There is clear evidence that the use of chemicals in the treatment of sea lice has increased to disturbing levels and an increase in the production of salmon will only lead to a corresponding increase in their use. The report acknowledges the associated problems given the increasing lack of effectiveness of current treatments, but no clear path forward is given. Add to that the lack of understanding of changes in plankton communities and potential for larger and more dangerous algal blooms from these chemicals and nutrient enrichment. As the report states 'there remain substantial uncertainties relating to the exposure and effects of aquaculture chemicals in the marine environment'.

The report refers to concerns about the Minch. Scallop divers have noted that there have been issues over recent years with spat following an algal bloom and a decline in catches of scallops.

To an extent people have accepted the current level of production although not all do. However, they accept the pay-off of jobs and assume that the chemicals will disperse or breakdown. But they are not as accepting of the increase in production not just locally but also more widely in Scotland. Moreover they are concerned about the type of chemicals being used and the view that as these chemicals and waste are in the sea they will eventually disappear. They also have justifiable concerns about levels of regulation and the efficacy of SEPA in insuring that they are kept to. There has long been anecdotal information that this has not always been the case.

They are also concerned about the food fed to farmed salmon. People have long been worried about the use of wild fish to feed salmon and of the use of chemicals such as to colour the flesh and now of other sources of food such as soya.

It may be thought, and the SAMS report certainly states this, that fish farming takes up only a small area of sea but an important issue is that of the sites of the farms. Fish farms and their equipment are found in most of the small bays along the west coast. It is also not uncommon to find abandoned or unused equipment littering the shores of these bays. That is an environmental impact which is not mentioned in the report nevertheless it is important. It is also the particular sites that fish farm companies wish to use that are pertinent. The sites currently being applied for in the Summer Isles are highly visible to local communities as they are inshore, adjacent to islands no doubt because they have a good water exchange but also in some shelter and moderate depth. But the sites are both productive prawn grounds so there would be an economic impact on local fishermen as well as other issues about loss of sheltered waters. The sites that would be closed would be of little use as they would need to remain fallow for a good number of years.

As well these sites are within an area where cetaceans are common in summer. Large numbers of porpoises and dolphins move around this area with numerous juveniles. Whales also move through the area as it is clearly a good environment for feeding. This is one of the concerns about environmental impacts from fish farming. There are also seal haul outs all around these islands and a designated site near one of them for grey seals. These issues are important to the local communities not only because the marine environment is important to them but also for economic reasons as tourism is a significant means of income. The report makes clear there are concerns about these environmental impacts but they do not appear to deter the large multinational companies.

Overall the SAMS report makes clear there are many environmental impacts from fish farming the effects of which are unclear and more than potentially unacceptable. The impacts are such that the drive to increase production to such an extent such should not be allowed and that better measures be put in place to reduce the impacts on our marine environment.