

Environment, Climate Change and Land Reform Committee

Environmental impacts of salmon farming

Written submission from Scottish Environment LINK

Scottish Environment LINK welcome the opportunity to provide written evidence on the SPICe commissioned report by the Scottish Association of Marine Science titled 'Review of the environmental impacts of salmon farming in Scotland'. LINK have been actively engaging in responding to salmon farm planning applications in Scotland, focusing primarily on those located within Scotland's Marine Protected Area network.

LINK considers that the current environmental impact of the salmon farming industry is unacceptable and should be mitigated. Any expansion of the industry will only exacerbate its impact. Therefore, LINK has particular concerns over the Scottish Government proposal to increase aquaculture production to 210,000t by 2020 and the salmon farming industry's own proposed target to double production to 300,000 - 400,000t by 2030.

In light of these targets, LINK established a subgroup on aquaculture in 2017 to focus on the potential impacts of a growing salmon farming industry and identify potential options for mitigating its environmental impact. The Aquaculture Subgroup consists of seven members of LINK: Hebridean Whale and Dolphin Trust, Marine Conservation Society, National Trust Scotland, Salmon and Trout Conservation Scotland, the Scottish Wildlife Trust, Whale and Dolphin Conservation, and WWF Scotland.

On February 6th, Sam Collin, convener for the Aquaculture Subgroup, provided oral evidence on behalf of LINK, where our main concerns with the SAMS report and the future growth of the salmon farming industry were raised. Since the Aquaculture Subgroup's members represent a range of environmental interests, it was decided that submitting detailed individual written evidence focusing on the areas of expertise for those members would be the most effective use of collective resources. This response sums up some high level areas of shared concern.

Overall, LINK welcomed the SAMS report and thought it covered the environmental risks that LINK considers to be of most importance. There were, however, some significant shortcomings in the information covered by the review, including some that are readily available particularly in relation to the impacts on Priority Marine Features and Marine Protected Areas.

In brief, LINK's main comments on the SAMS report are:

- An overarching theme of the SAMS report is that there has been a lack of

progress in tackling many of the key risks identified previously in the 2002 SAMS report;

- The report specifically raises concerns or knowledge gaps around the adverse risk this sector poses to 'ecosystem functions, their resilience and the supply of ecosystem services' which, if not adequately addressed, could result in a deterioration of the natural marine environment.
- The report inadequately addresses the current and potential impact salmon farming has on Scotland's MPA network, particularly considering the scale of growth proposed;
- The report does not adequately address the impacts of sea lice on sea trout;
- The sea lice trigger levels need to be re-evaluated and supported by robust scientific evidence;
- The use of wild-caught cleaner fish needs tighter controls and a fisheries management plan for wrasse is required.

More detail on these concerns can be found in the LINK members individual responses.

Sam Collin

Convener for the LINK Subgroup on
Aquaculture Marine Planning Officer,
Scottish Wildlife Trust