

Environment, Climate Change and Land Reform Committee

Environmental impacts of salmon farming

Written submission from Animal Concern Advice Line and Save Our Seals Fund

I regret that this is not as full a submission as I would like. Your 196 page report was published on 25th of January. Perhaps those responsible for circulating the report and requesting comments had a dram or two on Burns Night as, despite having been heavily involved in this issue for over 30 years, I was not aware of its existence until informed by a fellow campaigner on the 30th of January.

The lack of time given to study the report is an insult to its authors and totally unnecessary. Salmon farming has been damaging the Scottish marine environment for over four decades therefore providing an extra four weeks or so to allow for more detailed submissions would not have made a great difference.

Due to pressure of work and the unreasonably short period of time given to respond to the report this short, last minute submission will have to suffice.

My interest in salmon farming started in the early 1980s when I received eyewitness reports of unregulated seal shooting at salmon farms on the west coast. I attended early meetings of the Scottish Fish Farming Conference which were more than adequately accommodated in the Corran Halls in Oban.

At one of those early meetings a presentation was given by a student who had spent three months researching predator interactions at a smolt farm beside a fresh water loch in Argyll. During his three months at the farm he filled two chest freezers with the carcasses of heron and other birds which had died by shooting or entanglement in loose anti-predator nets over the tanks containing the smolts. It's not only seals that die because of salmon farms but

Regretfully little or nothing has been done to investigate and combat the toll salmon and other forms of fish farming are having on birds and mammals such as otters.

As the industry expanded so did the annual conference. It moved to larger venues such as Eden Court in Inverness and then the SECC in Glasgow. At some of these Conferences I attended as a representative of a fictitious fish feed producer and socialised with some of the salmon farm workers. That was how I learned that seal shooting was routine on most farms and that at one cage site on one farm over 60 seals had been shot the previous year.

For over a decade my guesstimate of circa 3,000 seals (10 per farm site) being shot each year was widely used and never contested. I'm sure that was because it was a very conservative figure. Since the seal shooting licences were introduced we have "official" figures which show the number of seals killed to be "only" in the hundreds and reducing year by year. These figures are collected on an honesty box basis with the shooters filling in their own returns. They might as well be reporting the number of pigs seen flying over the farm cages.

Another myth is that seals are only shot as a last resort. For years the Scottish Government has refused my request to make it a legal requirement for salmon farmers to install and maintain high strength, tensioned predator exclusion nets. An often used industry excuse is that the farm is in an area where the geography or tidal conditions make it impossible to use predator exclusion nets. All that means is that the farm is in the wrong place.

Farms without such nets (circa 80% of farms) cannot claim to be meeting the legal "last resort" qualification for shooting seals. Although it is not an environmental impact salmon farms without predator exclusion nets are also routinely breaching the Animal Health & Welfare (Scotland) Act 2006 by failing to stop predators getting close enough to their stock to cause the fish fear and stress.

I hope the Environment, Climate Change and Land Reform Committee will take into account the welfare of salmon in Scottish salmon farms. As well as causing their stock fear and stress by not excluding predators, salmon farmers have also failed to protect the welfare of their stock from disease and parasite infestations. Many fish have also been injured or killed by misuse of mechanical lice removal equipment. Indeed millions of fish have been poached to death during warm water treatments to kill sea lice.

Figures for 2016 show that the Scottish salmon farming industry lost over 25% of stock due to disease, parasite infestation and mishandling. The industry has even given us a new fish disease named after the Isle of Skye where it first occurred.

In 2016 over, perhaps well over, 10 MILLION fish suffered and died on salmon farms in Scotland. If 10 million cows or sheep had died under similar circumstances there would have been a national outrage with industry leaders and the Government Minister responsible picking up their P45s.

There can be no doubt that salmon farms have a tremendous negative impact on our environment and the wild animals which inhabit it. Keeping large numbers of fish in totally unnatural close proximity causes sea lice infestations and disease epidemics. By spreading to wild fish, especially smolts returning to sea, sea lice are at least partially responsible for the huge decline in wild salmon and seatrout stocks.

In addition to the lethal danger posed by sea lice infestations wild salmon and seatrout are also at risk from the huge epidemics of disease which kill millions of farmed salmon every year. This not only exposes local wild fish populations to disease but also those in rivers from here to the north of England where diseased salmon are transported in leaking lorries to be disposed of as toxic waste.

The powerful chemicals used to combat sea lice will also kill relatives of sea lice including the young of crab, lobster and other shellfish. As well as damaging the marine environment and the base of the food chain this could have a devastating effect on shellfish farmers and gatherers.

Importing wrasse to act as cleaner fish risks depleting wild wrasse populations as far south as Cornwall. The use of cleaner fish should be suspended until/if a truly sustainable source can be found.

I'd like to also explode the myth of the sustainable "Scottish" salmon farming industry. Most of the farms are Norwegian owned and many, perhaps most, of the fish are imported from Norway as fertile eggs. The Scottish Government has bent over backwards and totally abused our own Freedom of Information Act several times while sacrificing our marine environment and the animals which inhabit that ecosystem by encouraging but failing to control a polluting industry whose profits are more likely to end up in Oslo than Edinburgh.

Scottish Government Ministers love to call salmon farming "sustainable". Ignoring the fish welfare and pollution problems how can any industry be sustainable when it uses more wild fish as fish food than it produces in finished product and then loses 25% of its product to disease, parasites and mishandling?

Instead of encouraging mass growth of salmon farming in Scotland I urge the Environment, Climate Change and Land Reform Committee to recommend that the Scottish Government impose a moratorium on salmon farm expansion and properly police existing salmon farms in a bid to eradicate bad practise, parasite infestations, predator persecution, disease epidemics, pollution and other stock welfare problems.

This would make even more sense if, as is likely, Russia, China and Iceland get heavily into Atlantic Salmon production and existing Norwegian companies continue their expansion in areas outside Europe. You must also consider the impact on the industry of the import ban on all fish products from Scotland into the USA which will come into force on 1st January 2022 if the Scottish Government does not make it totally illegal for fish farmers and other fishery interests to kill seals and other marine mammals well before that date. The submission to the American Government by the Save Our Seals Fund was specifically mentioned by the US official when he announced this implementation of the US Marine Mammal Protection Act.

Please accept and acknowledge receipt of this submission from Animal Concern Advice Line and Save Our Seals Fund. Feel free to publish and disseminate our details along with this submission.

John F. Robins