

## **Environment, Climate Change and Land Reform Committee**

### **Environmental impacts of salmon farming**

#### **Written submission from W Melville McDonald**

I am a senior salmon angler and I am extremely interested in the Review of the environmental impact of fish farming currently being undertaken largely because I support the Salmon and Trout Conservation view that salmon Farming in Scotland has had and continues to have an adverse impact on wild stocks of salmon and seatrout particularly on the west coast of Scotland but also in the western and northern isles through uncontrolled sea lice.

To give you some background I went to live and work in Argyll in 1987. I participated in salmon and seatrout angling on the River Add which drains into the Atlantic at Crinan in Argyll close to where I lived in Lochgilphead. Around the time I moved there salmon farming was becoming established in the immediate area. The River Add in 1987 and 1988 supported a very healthy stock of seatrout. Within a couple of years the stock of seatrout in the river Add became virtually non existent and that has become a situation right up and down the west coast of Scotland since that time. I have absolutely no doubt in my mind that the culprit of this decline is open cage salmon fish farming. It took a little time for the salmon to be affected due to their different lifecycle but I also have no doubt that fishfarming ( along with other factors) has had a major negative impact on salmon and seatrout stocks throughout the west coast of Scotland. The cumulative impact of this has had a massive adverse impact on the sport of salmon and seatrout angling in Scotland. This is an industry which supports many more jobs than the salmon fishfarming industry and contributes massively to the Scottish economy.

I took time to read the whole of the SAMS Research Services Ltd report ( all 196 pages of it) and I also listened intently to the whole first session of the review in the Scottish Parliament last week.

To say that I was disappointed if not angry about the content of the report and the subsequent session in chamber is an understatement.

I simply cannot believe that in the 15 odd years since that first report was commissioned on which the ' expert reviewers' based their report, that there was so little meaningful 'evidence' of the impacts of fish farming to have been made available by fish farming interests or the scientific community to allow a much more concise and meaningful appraisal to take place.

What this suggests to me is the the fish farming industry has been allowed to expand at an uncontrolled rate and that proper monitoring and reviewing processes have not been effected as should have been required in the interests of maintaining the integrity of the environment. I also suspect that the industry has used their influence ( with the knowledge and support of Scottish Government officials) to obscure information which should have been available in the public domain.

That review creates more questions than answers. In addition I cannot help feeling that some of the scientific panel were frugal with the 'truth' on some of the questions they were asked. Have they been restrained? Are they really impartial?

I am not going to say that fishfarming has been the sole reason for the decline in wild salmon and seatrout stock on the west coast of Scotland. There are many other factors which have effected a serious decline in wild fish stocks over the last 10/15 years or more. Most notable of these is the massive increase in levels of in river 'protected' avian predation and the uncontrolled increase in the number of (protected) seals around our coasts.

Other threats exist in rivers and on the high seas over which we have little control.

However if the Government has a mind it is possible to control fish farming practices and predation as these issues are actually within our control.

I have attached a number of links to illustrate my assertions here and do hope that The Scottish Government consider serious actions to control the expansion of fish farming in Scotland. In my view the proposed expansion is completely unsustainable and indeed should not be allowed to proceed unless it is done through environmentally friendly close containment land based systems.

W M McDonald

**Relevant evidence to support my assertions:**

<https://www.nytimes.com/2017/11/06/world/europe/salmon-norway-fish-farms.html>

<http://www.asf.ca/scientists-confirm-precipitous-decline-in-wild-salmon-stock.html>

[REDACTED]

[REDACTED]

[REDACTED]

<https://brage.bibsys.no/xmlui/bitstream/handle/11250/2475746/1449.pdf?sequence=1&isAllowed=y>

[http://www.heraldscotland.com/news/15384902.Fish\\_farms\\_industry\\_now\\_at\\_war\\_w\\_ith\\_SEPA\\_over\\_toxic\\_loch\\_pesticide/](http://www.heraldscotland.com/news/15384902.Fish_farms_industry_now_at_war_w_ith_SEPA_over_toxic_loch_pesticide/)

<http://www.bbc.co.uk/news/uk-scotland-12991536>

<http://www.gov.scot/Uploads/Documents/IR1206.pdf>

<http://www.independent.co.uk/life-style/food-and-drink/news/salmon-sea-lice-plague-outbreak-fish-farms-global-stocks-depleted-aquaculture-industry-a7955326.html>

<http://www.eatthis.com/shocking-facts-about-farmed-salmon/>

<http://www.gov.scot/Publications/2004/03/19079/34371>