

Environment, Climate Change and Land Reform Committee**Environmental impacts of salmon farming****Written submission from Howard Wood OBE**

Thank you for allowing me to put forward my views and concerns over the environmental impact of open pen Salmon farming.

First of all I would like to state that I believe Scotland could be a world leader in sustainable Aquaculture. However the route we have gone down over the last 2 decades, with Government supporting mainly offshore owned multi-national companies, who care little for our environment and treat many west coast communities with nothing but contempt, does no credit to Scotland.

I have spent over 20 years working to protect Scotland's marine environment. Trying to persuade both fishing industry, aquaculture and SEERAD now Marine Scotland to manage our seas sustainably for the benefit of all but especially the next generation. In all those years the crux of the many issues always comes down to a conflict of interest within the Scottish Government's department responsible, at present Marine Scotland (MS). Evidence clearly shows that it is impossible for MS to act as both regulator of aquaculture (to prevent environmental deterioration) and also economic promoter of aquaculture. It is my understanding that MS take advice from SNH on nature conservation and SEPA on environmental pollution. After over 20 years of experience with a wide selection of officials from SNH, MS & SEPA it is fairly obvious to me that MS often ignores or delays acting on their advice, rarely even considering public concerns. This is due to this clear conflict of interest, and no doubt one of the reasons that the 2 parliamentary committees are holding this inquiry

The fundamental issue is - Are Marine Scotland managing our seas on behalf of the public? or on behalf of vested economic interests? At present it consistently puts short term economics first, against a poor second of long term protection of natural capital (environment). The second evidence session by ECCLR committee on Tuesday 6th of February, clearly showed officials from MS, SEPA and Highland Council Planning consistently evading answering simple questions. I have believed for a long time that MS fundamentally misunderstands it legal duties on how it should manage a public asset.

Scotland has recently designated a network of Marine Protected Areas (MPA). The response from aquaculture industry was to immediately apply for dozens of new sites and extensions to increase biomass within existing sites. Many communities have campaigned for decades for MPAs, in order to allow our seas to recover from decades of overfishing and poor management. These communities feel they are being treated with nothing but contempt by both the aquaculture companies and the Cab-Sec Fergus Ewing, who is encouraging this 100% increase, despite the numerous problems this industry faces.

An acknowledged world expert on MPAs Professor Callum Roberts stated this week:

"The multiple environmental problems associated with open-cage salmon farming have been thoroughly established by scientific research. Individually, many impacts represent a serious risk to the conservation objectives of marine protected areas. Collectively, they guarantee an unacceptable level of impact. Open cage salmon farms are incompatible with the conservation objectives of protected areas and should not be sited within them".

ISSUE

Indefinite length of both Crown Estate lease & SEPA CAR licence

Faeces and toxic chemical pollution in water column and seabed.

Environmental food miles of contents of feed

Floating industrial units in scenic lochs and bays

Marine Protected Areas not Marine Protected Features

Escaped fish

Sea lice effects on wild salmon and sea trout

Emamectin benzoate effecting shell fishermen.

Independence of SAMs Tett review (due to substantial funding received for research on aquaculture)

Potential increase in Lamlash Bay effecting 10 years of ground breaking environmental research

Increase Toxic algal blooms due to climate change and increased nutrients.

SEAL acoustic ADDs effect cetaceans

Unregulated wild Wrasse fishery

Polluter pays principle

Self monitoring by salmon farm businesses

Howard Wood OBE

Recommendations

Leases and licenses should be time limited (as in Canada) where renewals are dependent on environmental performance.

Move to closed containment

Stop using Antarctic Krill & Peruvian anchovies.

Move to land based units

Immediate moratorium of Salmon farms with a 5 year timeframe to remove completely.

Move to closed containment.

Move to closed containment

Move to closed containment

It's a interesting report but hardly independent as was clear when questioned by MSPs

Immediate moratorium of Salmon farms within MPAs. With a 5 year timeframe to remove completely.

Move to closed containment. Are warming Scottish waters suitable for farmed Salmon?

Move to closed containment

Needs immediate regulation as the South West IFCA did in England. Longer term, move to closed containment

It's no longer appropriate that the environment pays.

Doesn't work in public interest. SEPA to monitor, paid for by aquaculture company.