

Marine Conservation Society position statement on Scottish Salmon Farming

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Farmed Atlantic salmon is the most popular fish consumed in the UK. Salmon farming started in Scotland in the 1970's and is still regarded by some as a young industry. After a steady start, the industry began to rapidly expand, and in the 1990's, production increased from 32,391 tonnes in 1990 to 205,393 tonnes in 2021. The UK domestic market is worth around £1.2 billion a year with the 2021 export value of £614 million, making it both Scotland and the UK's top food export, with the EU, in particular France, being the largest importer.

Salmon farming takes place off the west coast of Scotland and around Shetland, Orkney and the Western Isles, all known for their stunning visual landscape. These areas are also rich in marine life, including maerl, fan mussel, grey seal, common seal, and harbour porpoise, all of which are Priority Marine Features due to their importance to our seas.

Young salmon are raised in hatcheries and then grown as juveniles in either land-based tanks or freshwater lochs until they are ready to go to sea, at which point they are termed smolts. These smolts continue their growth to adult size in open net pens in Scottish coastal waters, typically for around 18 months until they reach harvest size of around 4-6kg. There is also an increasing trend of smolts being kept in land tanks for longer order to shorten the grow-out phase in open seawater. These open sea pens allow for the constant flow of fresh seawater, but they also allow for waste products, such as faeces, uneaten feed, chemicals, and sea lice to enter the sea where they can damage local marine life and wild fish.

In 2023, the Scottish Government released their Vision for Sustainable Aquaculture, laying out guidelines on the future development of the industry and placing the environment and its protection on equal footing alongside economic and societal considerations. Marine Conservation Society welcomes the Vision, in particular the environmental commitments made within it. We believe it is imperative that these commitments and those environmental impacts previously identified in parliamentary reviews, are demonstrably addressed before claims of environmental sustainability can be made by the industry.



The following outline the key concerns we have with this production method which want to be fully understood and mitigated for through effective regulation.

- The cumulative impacts of multiple farms in a shared water body, as well as the cumulative impacts of multiple marine users in a shared space such as aggregate dredging and offshore wind farms.
- Impacts on sensitive habitats and species including within MPAs, of which 1 in 3 salmon farms operate.
- Ongoing need to achieve certified sustainable feed sources including both marine and terrestrial ingredients.
- Sea lice on both farmed and wild fish and the treatment of those including;
- The reliance on wild caught cleaner fish, that due to poor management, risk being locally overfished and depleted,
- The current waste associated with the lack of post- harvest use of cleaner fish,
- Sea lice chemical treatments and the impact they can have on local habitats and species.
- Disease outbreaks on the farmed fish and how they are treated.
- Fluctuating levels of mortality across regions and years.
- Escapes of farmed salmon and how they interact with wild salmonids.

Scottish salmon farmers have committed to the sustainable development of the industry which is supported by the Scottish Government's Vision of Sustainable Aquaculture and the UK Joint Fisheries Statement. The Vision lays out the ambitions for the growth of the sector and commits to protecting the marine environment for future generations. It is built on the Scottish Government's guiding principles on the environment and prioritises responsible industry developments enabled by effective governance and sound science. For the aquaculture industry to progress on this basis, it is imperative that the issues above are addressed before any further expansion of the industry can take place and that the precautionary principle is followed during development.

The Marine Conservation Society asks

UK Governments

- To deliver on the commitments made regarding aquaculture in the UK Fisheries Act (2020) and the Joint Fisheries Statement (JFS) to cooperate on the sustainable development of the industry and delivering on the Fisheries Objectives, including ensuring an ecosystem-based approach and aligning with the UK's climate change objectives.

Scottish Government

- To implement the commitments made in Scotland's Vision for Sustainable Aquaculture in a timely manner continuing with their approach of multi-stakeholder engagement.
- Align implementation of the Vision for Sustainable Aquaculture with the wider Scottish Government Blue Economy Approach for nature-positive marine sectors.
- To provide support and incentives for the promotion of new technological and innovative industry solutions that show real environmental benefits.
- To consider the cumulative impacts of salmon farming and other marine users during the development of the Scottish Government's National Marine Plan 2 and ensure aquaculture is spatially managed and fully incorporated into Regional Marine Plans.
- To adopt a precautionary approach to assess the direct and indirect impacts salmon farming has on all Scottish Priority Marine Features, both inside and outside Marine Protected Areas, and to identify those features most at risk.

Industry regulators

- Implementation of the Scottish Environment Protection Agency (SEPA) sea lice risk assessment framework including monitoring and enforcement to ensure it is achieving its objective of the protection of wild salmonids. This should be in addition to addressing the other impacts on wild salmonids as identified by North Atlantic Salmon Conservation Organization (NASCO).
- To work together to ensure that regulations applying to the salmon farming sector are transparent, precautionary, comprehensive, address all environmental aspects of production and are robustly monitored and enforced.
- To ensure data relating to the performance of the industry is made publicly available via the Scottish Aquaculture website. The reporting of which should be a statutory requirement.
- To pursue re-location of salmon farms from unsuitable sites and consider alternative uses for these vacated spaces, including returning to nature.

Industry regulators

- Work in collaboration with all stakeholders to deliver the objectives of the Vision for Sustainable Aquaculture.
- To continue to invest in research and innovative solutions to improve environmental performance, including commercial trial and subsequent implementation of these solutions
- Explore the potential for moving further offshore, if supported by sound science that has demonstrated the environmental impacts of offshore production are an improvement on the current inshore operations.

- Continue to explore and commercially trial innovative ways for waste capture and sea lice management by the adoption of semi-closed and closed production systems.
- Invest in research and commercial trials of innovative feed solutions including, but not limited to algal oil, hemp and insect proteins.
- To work with regulators to provide timely data to inform and improve future decision making.w

Seafood business

- Register for the [Good Fish Guide for Business](#) and get involved with ratings consultations.
- Only source seafood with ratings of 1-3 on the Good Fish Guide.

Consumers

- To use the [Good Fish Guide](#) (website, smart phone app) to make the most sustainable seafood choices whenever buying seafood. This includes trying to diversify from the 'Big 5' of: cod, salmon, tuna, haddock and prawns.

What the Marine Conservation Society is doing

- Use our position as a member of the Scottish Aquaculture Council to advocate for the environment and hold the Scottish Government accountable to the commitments made in the Vision for Sustainable Aquaculture.
- Continue Marine Conservation Society engagement on the timely implementation of the Vision for Sustainable Aquaculture, National Marine Plan 2 and the development of a Sea Lice Risk Assessment framework.
- Working collaboratively with Scottish Environment LINK to amplify our collective voices and maximise our impact.
- Working with independent standard holders such as Aquaculture Stewardship Council (ASC), GLOBALG.A.P. and Global Seafood Alliance (GSA) to improve standards in relation to feed sourcing and production practices.
- Maintaining the Good Fish Guide and regularly updating salmon assessments as needed.
- Supporting the trade and consumption of the most sustainable seafood, including responsibly farmed salmon that is certified to credible standards.

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