



Head Office
Overross House
Ross Park, Ross-on-Wye
Herefordshire HR9 7US
T 01989 566 017
E info@mcsuk.org

Scotland
Suite 7, CBC House
24 Canning Street
Edinburgh EH3 8EG
T 0131 633 4000
E scotland@mcsuk.org

London
CAN Mezzanine
7-14 Great Dover Street
London SE1 4YR

www.mcsuk.org

December 2020

MCS POSITION STATEMENT: SCOTTISH SALMON FARMING

THE MCS VIEW

Farmed salmon is the most popular fish consumed in the UK. It is the biggest aquaculture sector in the UK, producing 203,881 tonnes of fish in 2019, the highest production figure ever recorded. In 2016, its farm gate value was £766 million. It is both Scotland's and the UK's top food export, with USA, France and China being the largest importers. 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. MCS believes that Scottish Government, industry regulators and the salmon farming industry need to demonstrate that they have addressed all of the environmental concerns outlined by the Rural Economy Connectivity Committee before further expansion of the industry can take place.

Salmon farming started in Scotland in the 1970's and is still regarded by some as a young industry. After a steady start, the 1990's saw the industry begin to rapidly expand. In 1990, production was at 32,391 tonnes whereas in 2019, production was 203,881 tonnes. 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 for around 18 months until they reach harvest size of around 4-6kg. 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 into the sea where they can do damage to local marine life and wild fish.

The following outlines the key concerns we have with this production method, which we want to be fully understood and mitigated through effective regulation and improved industry practices:

Key issues with Scottish salmon production:

- 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;
- Sea lice chemical treatments and what they can do to local habitats and species;
- Disease outbreaks on the farmed fish and how they are treated;
- The impacts of multiple farms in a shared water body;
- Escapes of farmed salmon and how they breed with wild salmon, which in turn makes these vulnerable fish less able to survive;



Head Office
Overross House
Ross Park, Ross-on-Wye
Herefordshire HR9 7US
T 01989 566 017
E info@mcsuk.org

Scotland
Suite 7, CBC House
24 Canning Street
Edinburgh EH3 8EG
T 0131 633 4000
E scotland@mcsuk.org

London
CAN Mezzanine
7-14 Great Dover Street
London SE1 4YR

www.mcsuk.org

- Impacts on wildlife such as seals and porpoises from the use of unregulated acoustic deterrent devices (ADD's) to deter predators;
- Ongoing need to achieve sustainable feed sources.

Despite these concerns, the Scottish aquaculture industry is being encouraged to grow to double its economic value to £3.6 billion by 2030¹. This would mean an estimated production of 350,000 tonnes, achieved by a 5% growth every year. We believe this growth to be irresponsible while there are still improvements to be made and conflicts with the precautionary approach.

THE MCS ASKS

UK governments

- To recognise the importance of aquaculture in the Joint Fisheries Statement being developed under the new UK Fisheries Act 2020 and to include joint policies that encourage the development of low carbon, low impact, environmentally sustainable aquaculture.

Scottish Government

- To ensure that all issues of environmental concern, as identified by the reports arising from the Scottish Parliament Information Centre (SPICe) report² and subsequent Environment Climate Change and Land Reform (ECCLR)³ and Rural Economy and Connectivity (REC) committee reports⁴ are demonstrably addressed as quickly as possible, and that the precautionary approach is applied before further industry growth is considered.
- To provide support and incentives for the promotion of new technological and innovative industry solutions that show real environmental benefits.
- To 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.

¹ HIE & SAIC. 2017. Scottish Aquaculture: a view to 2030. Available online at: <https://aquaculture.scot/>. Accessed 01/12/2020

² The Scottish Parliament. 2018. The environmental impacts of salmon farming in Scotland. Available online at: <https://digitalpublications.parliament.scot/ResearchBriefings/Report/2018/2/13/Salmon-Farming-in-Scotland>. Accessed 01/12/2020

³ The Environment, Climate Change and Land Reform Committee. 2018. Report on the Environmental Impacts of Salmon Farming. Available online at: <https://www.parliament.scot/parliamentarybusiness/CurrentCommittees/107588.aspx>. Accessed 01/12/2020

⁴ Rural Economy and Connectivity Committee. 2018 Salmon farming in Scotland. Available online at: <https://www.parliament.scot/parliamentarybusiness/CurrentCommittees/107585.aspx>. Accessed 01/12/2020



Head Office
Overross House
Ross Park, Ross-on-Wye
Herefordshire HR9 7US
T 01989 566 017
E info@mcsuk.org

Scotland
Suite 7, CBC House
24 Canning Street
Edinburgh EH3 8EG
T 0131 633 4000
E scotland@mcsuk.org

London
CAN Mezzanine
7-14 Great Dover Street
London SE1 4YR

www.mcsuk.org

Industry regulators

- 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.

The salmon farming industry

- To support and fully comply with regulations.
- To continue to invest in research and technological solutions to improve environmental performance.
- Continue to innovate by adopting ideas such as waste capture and innovative feed solutions.
- To work with regulators to provide timely data to inform and improve future decision making.

Businesses and consumers

- To use the [Good Fish Guide](#) (website, smart phone app or pocket guide) to make the most sustainable seafood choices whenever buying seafood, and to diversify from the 'Big 5' of: cod, salmon, tuna, haddock and prawns. More information on the best alternatives is available [here](#).
- To only buy certified farmed salmon, using the Good Fish Guide to make the best choice of those available
- For businesses to include certification labelling on pack to enable consumers to make an informed choice.

WHAT MCS IS DOING

- Working with Scottish Environment Protection Agency (SEPA) in their Advisory Group for Aquaculture as a representative of Scottish Environment LINK, to ensure that the new Aquaculture Sector Plan addresses the key issues of environmental concern as outlined in the recent reports.
- Raising awareness of environmental concern regarding the salmon farming industry via consultation responses: [MCS written evidence to the ECCLR committee](#) and [MCS written evidence to the REC committee](#).
- Working with independent standard holders such as Aquaculture Stewardship Council (ASC), GlobalGap and Global Aquaculture Alliance (GAA) to improve standards in relation to feed sourcing and production practices.
- Working with local, regional and national partnerships to identify problems and promote best practice
- Maintaining the Good Fish Guide and regularly updating salmon assessments as needed.



Head Office
Overross House
Ross Park, Ross-on-Wye
Herefordshire HR9 7US
T 01989 566 017
E info@mcsuk.org

Scotland
Suite 7, CBC House
24 Canning Street
Edinburgh EH3 8EG
T 0131 633 4000
E scotland@mcsuk.org

London
CAN Mezzanine
7-14 Great Dover Street
London SE1 4YR

www.mcsuk.org

- Promoting the trade and consumption of the most sustainable seafood, including farmed salmon that is certified to credible standards

Contact:

Dawn Purchase
MCS Aquaculture Programme Manager
dawn.purchase@mcsuk.org