

## Aquaculture Debate

**LINK MTF believes all aquaculture legislation should ensure development within the industry is founded on the five guiding principles of sustainable development (in line with the Scottish Government's own Sustainable Development Strategy): living within environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using science responsibly.**

### **Aquaculture and the regulatory framework**

Ensuring that environmental protection and recovery is central to aquaculture management is an essential requirement for the Scottish and UK governments to enable them to deliver international commitments under the OSPAR convention, the World Summit on Sustainable Development, and the EU Marine Strategy Framework Directive (MSFD). The MSFD demands a strategic approach to the conservation of marine ecosystems, including achieving Good Environmental Status for our seas by 2020, and addressing all human activities - including aquaculture - that have an impact on the marine environment. It is also essential for compliance with the EU Water Framework Directive as transposed by Water Environment and Water Services (Scotland) Act 2003 (the WEWS Act) which requires that all inland and coastal waters out to 3 nautical miles achieve Good Ecological Status by 2015.

The Scottish aquaculture industry must now be considered within the context of the Marine (Scotland) Bill, which was passed by the Scottish Parliament in February 2010. The Act, when implemented, will provide a framework for the development of all industries and activities throughout Scotland's seas via the marine planning system. All marine plans arising from the Marine (Scotland) Act will contain marine ecosystem objectives and any authorisation or enforcement decisions must be taken in accordance with the appropriate marine plans. In exercising any function that affects the Scottish marine area, Scottish Ministers and public authorities must act in the way best calculated to further the achievement of sustainable development, including the protection and, where appropriate, enhancement of the health of that area, so far as is consistent with the proper exercise of that function. The Marine (Scotland) Bill includes a duty to create a network of conservation sites in order to ensure that Scotland meets its international commitments under OSPAR and WSSD for an 'ecologically coherent network of well managed marine protected areas' by 2010. Sites within the network must be managed according to ecological need to ensure the protection of the features for which they were designated.

*The Minister could be asked how the renewed Strategic Framework for Scottish Aquaculture is helping Scotland meet its numerous imminent national and international commitments to sustainable development, reducing biodiversity loss and achieving Good Environmental/Ecological Status under the MSFD and WFD respectively.*

The value of Scotland's marine environment is beyond economic calculation. However, fish farmers and regulators must agree that their industry is entirely dependent on a healthy marine ecosystem. The best way to enhance the marine environment's economic contribution to the future of the aquaculture industry is to ensure that marine ecosystem health, function and biodiversity, are adequately protected and, where there is degradation, allowed to recover.

*The Minister could be asked how the Scottish Government will ensure that the growing aquaculture industry, now moving from sheltered sea loch sites into more open waters, is consistent with the Scottish Government's own Sustainable Development Strategy, and the duty for sustainable development enshrined in the Marine (Scotland) Bill.*

## Priority Issues of Concern for LINK's Marine Task Force

**Siting of Farms:** LINK MTF believe many of the concerns associated with fish farming in open sea cages (such as organic waste accumulation, degraded water quality, sea lice and wild fish interactions, predator interaction and benthic biodiversity impacts), can be minimised by selecting appropriate sites for farms, within a wider marine planning framework. Where it is ascertained that farms are sited inappropriately these farms should be required to move to more appropriate sites.

*The Minister could be asked how the siting of aquaculture farms will be integrated into a wider Marine Planning framework under the Marine (Scotland) Bill.*

**Sustainable sources of feed ingredients:** LINK MTF has concerns over the sustainability of fish feed both from the pressure that it places on wild fish stocks, other marine wild life and ecosystems, combined with the potential environmental problems incurred by the search for non-fish protein and oil replacements such as Soya and palm oil.

LINK MTF believes best practice should use a combination of:

- full utilisation of by-products from fish processing,
- marine protein and oil sourced from certified sustainable fisheries; augmented with species from feed grade fisheries that are independently certified as sustainable by organisations such as the Marine Stewardship Council, whose assessments are based on the UN Food and Agriculture Organisation's (FAO) Code of Conduct for Responsible Fisheries, and who ensure ecosystem effects of such fisheries are included in their assessment process.
- partial substitution of the marine component of the feed derived from wild capture fisheries with replacement proteins/oils derived from vegetable sources (Soya, rape, palm etc), provided it can be independently demonstrated that those sources are from a known and traceable supply. Any soy and palm oil should be from sources independently certified to Basel Criteria or RSPO standard.
- Research into new sources of marine oils such as microalgae should be encouraged.

*The minister could be asked how the Scottish aquaculture industry is progressing towards the renewed Strategic Framework goals of "Feed derived from sustainable sources and understood as such" and "reducing the impact on wild fisheries by increasing use of alternative feed sources".*

### Other Issues

- **Freshwater production:** The use of cages in freshwater for the production of smolts or trout should be prohibited to reduce the impact of pollution and escapes on wild salmonid populations. This is a legal requirement in Norway.
- **Independent accreditation schemes:** The value of sustainable accreditation schemes such as Marine Stewardship Council and Aquaculture Stewardship Council should be recognised and used to improve Scottish Aquaculture legislation where appropriate.
- **Escapes:** Legislation on minimum standards for cage construction should be tightened to bring them in line with those used in Norway as a minimum.
- **Organic pollutants:** The farming of shellfish and macroalgae alongside marine farms should be explored as a means of reducing the impact of organic pollutants on the marine environment while providing economic incentives. The development of closed cage systems should also be encouraged.
- **Encouraging continuous improvement through science and dialogue:** Innovative research is the key to future sustainability of the industry.

**Scottish Environment LINK is the umbrella body for Scotland's voluntary environmental organisations, representing around 500,000 members.** Scottish Environment LINK's Marine Task Force is supported by:

Hebridean Whale and Dolphin Trust  
Marine Conservation Society  
National Trust for Scotland  
RSPB Scotland

Scottish Wildlife Trust  
WWF Scotland  
Whale and Dolphin Conservation Society

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