

3. ISSUE PAPER: **FINFISH AQUACULTURE**

Scottish Environment LINK's Marine Task Force is calling for fundamental reform of how we manage Scotland's seas.

Within broader reform, finfish aquaculture is one of three priority sectors requiring urgent attention. Full implementation of the commitments in the Strategic Framework for Aquaculture are needed; including **partnership working**, **policy change** and an **Aquaculture Bill**.

Why does it require urgent attention?

The Scottish finfish **aquaculture industry** today is **struggling** to be economically, socially or environmentally sustainable, with widespread job losses resulting from failure to compete on a global market based on quantity, not quality.

This crisis follows two decades of rapid expansion without a strategy for the long-term future of the industry, or plan incorporating the environment and the needs of other users. The **Strategic Framework for Scottish Aquaculture** (SFSA) launched in March 2003, makes a commitment to more sustainable aquaculture but **further fundamental action is needed**.

What's the problem?

Rapid growth of the finfish aquaculture industry from the 1970s brought economic benefits to many coastal communities, placing Scotland third in the world for salmon production. The industry is now a global sector in terms of production, investment and consumption, and the trend in Scotland has been towards fewer larger-scale farms. Large-scale global production and higher production costs in Scotland, however, mean that the Scottish industry is now growing at a slower rate than its competitors. The price of salmon has slumped to below the average cost of production, leading to recent cuts in investment and jobs.

Regulation of the industry is reactive and piecemeal, with SEERAD, the Crown Estate, SNH, SEPA, Local Authorities and the Veterinary Medicines Directorate all playing a role. The lack of a coherent plan for aquaculture is in part due to commercial pressures, in part due to poor understanding of environmental thresholds, and in part due to the lack of any framework or lead responsibility for spatial planning and prioritisation of marine and coastal activities. The expansion of fish farming is having an effect on other economic sectors like angling and may be impacting tourism.

Meanwhile, pressure to compete has increased the impacts of the industry on the environment. The exploitation of global fisheries for feed, damage to wild salmonids from sea lice and interbreeding with farmed fish, fish farm chemical and nutrient waste, are challenges to be addressed if the industry is to be sustainable. In the long-term, an economically viable industry depends on a healthy environment.

The Strategic Framework for Aquaculture (SFSA) is committed to an industry *'working in harmony with nature, managing and minimising transient environmental impacts, and avoiding significant, cumulative, long-term or irreversible changes to ecological systems, to cultural remains or to valued landscape or scenery'*

Promises for specific actions include:

- better modelling of environmental thresholds (assimilative capacity);
- review and reform of location policy to progress the relocation of farms from inappropriate areas;
- a Scottish Aquaculture Research Forum (SARF) to prioritise and manage research; review of the effectiveness of voluntary sealice initiatives;
- review of measures to minimise escapes ;
- review the quality of Environmental Impact Assessments, with the production of guidance for developers/regulators on minimum standards required;
- introduction of an industry environmental code of practice;
- an Aquaculture Bill, promised in the next session of the Parliament to take forward legislative changes identified;
- transfer of planning controls to local authorities and further development of Locational Guidance.

SFSA has made some progress, but further action is needed.

What causes these problems?

1. Poor governance

- With no lead body and no coherent framework for planning in the marine environment. there is no way to integrate, balance or prioritise the interests of aquaculture with the needs of other marine user groups.
- No national marine planning framework to support local marine management, such as aquaculture framework or zoning plans.
- Lack of leadership through the SFSA to support the certification of sustainably fished feed-grade fisheries and ensure only sustainable feed is used in Scotland.

2. Poor planning

- No national planning framework for aquaculture, inadequate locational guidance to enable spatial planning of aquaculture around the full range of nationally important biodiversity, landscape and other important interests, or to allow for fish farm free areas.
- Inadequate information on the environmental impacts of new farmed species and no clear strategy to minimize these.
- Fish farm applications considered on a site-by-site basis, with no loch-wide thresholds to prevent long-term or cumulative damage.

3. Poor management and monitoring tools

- Not all companies adhere to industry standards SQS or ISO 14001, and it is unclear whether these standards are meaningful in terms of good environmental practice
- No measurement of impacts on sensitive or protected habitats and species, or of long-term or cumulative impacts on lochs as a whole.
- No statutory environmental standard accepted and applied across the Scottish industry to ensure, for example, synchronized sea lice treatment
- No clear timescales for full SFSA implementation - many of the deadlines have already slipped.

- No strategic assessment of the impact of fish meal supplies on the source fish stocks.

4. Product sold on quantity not quality

- Inadequate labelling and consumer/retailer standards do not reflect environmental standards, make it difficult to differentiate Scottish farmed fish through production and marketing based on high environmental performance.
- Aspirations for industry expansion at Scottish and European level continue to be based on quantity rather than quality

What's the solution?

The aquaculture industry must bring forward developments which are sited, located and designed so that individually and cumulatively they fulfil the SFSA commitment to a sustainable industry.

Scottish inshore waters should be a 'multiple benefit resource', with socio-economic benefits deriving from its rich and diverse natural environment. Delivering these benefits requires strategic and co-ordinated planning, with the active involvement of all interests. Aquaculture planning should be part of a broader plan for the marine environment, to ensure the future of the wildlife and people that depend on coasts and seas.

Changes are needed to legislation, policy and organisational structures. Actions recommended below should fall within an overarching framework for management :

1. Scottish Executive leadership **to create a coherent national planning framework** for aquaculture which incorporates improved national locational guidelines and covers biodiversity, landscape, fish farm free areas and all other issues relevant to aquaculture planning
2. Strong support through a national plan for **local management decisions**, including local framework and zoning plans.
3. Scottish Executive and Scottish Aquaculture Research Forum (SARF) prioritisation of international work to certify sustainably-fished feed-grade fisheries, ensuring **only sustainable feed is used in Scotland and setting minimum standards for feed suppliers**.
4. **Statutory codes of practice and environmental standards** accepted and applied across the industry including escapes, alien species, disease, feed sources, sea lice treatment,
5. **Safeguards against cumulative or long-term impacts** on habitats, species or ecosystems at a loch-wide and national scale.
6. **Improved locational guidelines and environmental assessment** to include the full range of biodiversity and landscape issues.
7. All aquaculture plans, policies and programmes to be subject to **Strategic Environmental Assessment**
8. **Labelling of Scottish produce and transparent retailer standards** to ensure that the consumer can choose on the basis of good husbandry and high environmental performance.
9. **A strategy for the farming of 'new' species such as cod and halibut to ensure that environmental thresholds and safeguards should be set for new species before industrial production takes place.**
10. **Financial support from government for all Framework objectives and resources**, and capacity and guidance to local authorities fulfil their new planning responsibilities

5. Specific changes

In addition to primary framework legislation, a **Marine (Scotland) Act**, outlined in 'A Future for Our Seas', the following specific legislative and policy changes need to be made to existing legislation:

- Aquaculture Bill to support coherent planning framework and environmental standards across the industry
- Additional Local Authority planning powers in the marine environment to complement the transfer of planning powers in the Water Environment and Water Services Act, this could be done through a Planning Bill,
- Scottish Planning Policy prepared to enable coherent and comprehensive planning framework

This paper has been produced by the Scottish Environment LINK Marine Task Force

LINK is the umbrella body for Scotland's voluntary sector environmental organisations. The LINK 'Marine Task Force' consists of the following environmental organisations working on marine issues in Scotland:

British Association of Nature Conservationists
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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