

SANA RESPONSE TO AQUACULTURE PLANNING CONSULTATION

Consultation on Changes to Planning Legislation Affecting Fish Farming

1. The Scottish Government published: “Consultation on Amendments to Permitted Development Rights for Fin Fish and Shellfish Developments”.
Ref: <http://www.gov.scot/Resource/0051/00517477.pdf>
2. This paper required responses by 28th July 2017. It was very technical in nature and not all of the questions it posed are relevant to our interests in the subject. Most importantly, it did not address the fundamental issue about relocating fish farms which are in the wrong place with respect to migration routes for salmon and sea trout.
3. The starting point, which we have used before in responding to other consultations, is the SANA proposed policy position on aquaculture, dated 30th September 2011. In summary, this says:
 - we don't like lowest-cost production systems because they place the environment for wild fish at risk;
 - our objective should be to encourage the industry to “up its game”, by innovations which mitigate its impact on wild fish;
 - both freshwater and saltwater impacts could be avoided through use of closed production systems, i.e. fish farms separated from natural freshwater and sea water; and
 - re. farmed fish escapes, a variety of causes have been cited but the bottom line is that cheap containment systems are not impervious to accidents.

SANA's Responses

Question 1 – Do you agree that the cage size and area restrictions which prevent PDR use for replacement or relocation of an existing cage should be removed?

SANA: No. This consultation appears to be predicated on the assumption that fish farms are located in the right places. Many are not. All replacement should be judged against potential impact on wild fish. Ideally new/replacement capacity should be in closed containment systems.

At inland freshwater sites, and as far as non-migratory species are concerned, it has largely been escapee rainbows that have caused concerns, e.g. large fish getting out of Loch Tay into the river. This may have been due to nets being breached by predators, though nets may have either been too light for the job and/or suffered from lack of maintenance. Also, examination during planning applications should question the potential buildup of faeces below the cages and its effect on water quality, especially where large scale smolt rearing takes place.

Full planning permission should be required for any change in production capacity and its location.

Question 2 – Do you agree that prior notification should not be required for fin fish pens replaced, in the same location, with a finfish pen of the same size, colour and design?

SANA: No. SANA objects for the reasons cited above in our response to question 1.

Nor do we agree that change of fin fish species be automatically permitted. Ref: 6.4 Class 21F – Change of Use (Species). We are especially concerned about smolt rearing in migratory systems viz. the potential for genetic interactions with wild salmon, gradual eutrophication of the water bodies used for rearing cages and their outflow streams and environmental impacts of fish farm chemicals. Eutrophication can inhibit anadromous migrations of trout. However, enhanced freshwater growth and body size of wild trout and charr living in the same water bodies is highly popular with some anglers.

Full planning permission should be required.

*Craig Campbell,
23th July 2017*