

**To: Marine Scotland** [Tasha.Geddie@gov.scot](mailto:Tasha.Geddie@gov.scot) and [Lorna.King@gov.scot](mailto:Lorna.King@gov.scot).

**From: Scottish Anglers National Association Migratory Fish Committee**

## **The Fish Farming Businesses (Reporting) (Scotland) Order 2020**

### **Overview and Synopsis**

1. SANA's position on this subject was set out previously in evidence to the Scottish Parliament's REC Committee in 2018. We have drawn attention to the great deal of harm that has been caused to wild fisheries by finfish aquaculture. Nonetheless, we recognise the public interest in having this industry in Scotland, as well as the public interest in sustainable recreational fisheries. We welcome the provisions of this proposed order as an initial contribution to ensuring that the industry is required and supported to clean up its act.

### **Production Technology Upgrades**

2. The specific requirement to report lice problems should be part of a wider effort. We believe that past and current problems of lice infestation, water contamination and escapes of farmed fish are attributable to lowest cost production systems. To enable the industry to remain competitive in international markets, improved production methods should be supported, if necessary by public expenditure in the first instance. Specifically, closed containment for at least part of the production cycle, and ideally all production, including smolt rearing, should become obligatory.
3. Following further instances of fish farm escapes, notably at Carradale within the Firth of Clyde, triploidy should be introduced as an obligation to any continued use of open cage farming. The introgression of farmed fish genes in a wild fish recovery situation such as is occurring in the Clyde could be disastrous.

### **Motivation for Closed Containment**

4. The industry in Scotland is dominated by firms that hail from Norway. There, the salmon farmers, at their own hand, have declared a moratorium on expansion pending resolution of the problems the industry has in Norway. These problems are here too. Losses of fish on a big scale come from: sea lice infestation, escapes from sea cages, gill disease and infectious salmon anaemia – a disease presumed to be carried to cages by wild fish. We note that other sea species, including wrasse that are being used as lice cleaner fish, can be carriers of disease also.
5. In Norway, and in other parts of the world, attention is turning to closed containment systems – to create controllable environments for farmed fish – protecting them from

outside influences and protecting the natural environment from the waste products and parasites of fish farming. Therefore, closed containment is seen increasingly as being in the sector's own interest.

### **Regulation of Cage Sites**

6. The planning process has not prevented sea cages being located in the wrong places with respect to impact on wild fish. Consideration should be given to alternative methods of regulation.
7. Crown Estate Scotland is the monopoly landlord of sites for sea cages. As the assets have been subject to a devolution settlement, the Scottish Government has absolute control now over where fish farming is located.
8. In the short term, pending introduction of new production facilities, we hope that CES will be directed to take advice from Marine Scotland (MS) on appropriate locations or relocations for existing capacity. Following its past commissioning of research on this subject, MS should be best placed to know where open cage systems would have least environmental impact.

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Scottish Anglers National Association Ltd  
National Game Angling Centre  
The Pier, Loch Leven  
Kinross KY13 8UF

Tel: 01577 861116  
[www.sana.org.uk](http://www.sana.org.uk)