

Scotland

Cabinet Secretary,

24<sup>th</sup> September 2018

On behalf of the coastal communities we represent, we ask:

Do you want to preside over the demise of the west coast's wild salmon?

Do you want to explain to tourism operators why cetaceans are being illegally harmed by ADDs, or to fishermen that you do not know the effect of the pesticides being dumped in the sea?

Or do you want to lead the world, by making Scotland's farmed salmon something we can all be proud of? To achieve this, please:

- Apply the precautionary principle, by pausing fish farm expansion to establish the significance of its impacts: on wild salmonids, on PMFs, on commercially fished crustaceans, on cetaceans, on Harmful Algal Blooms, and, through all these, on sustainable jobs in coastal communities.
- Solve these problems by requiring the industry to expand using only closed containment, as Norway has done. Please identify to everyone, including the industry, the 'path' to closed containment. Akvafuture in Norway, for instance, is proof that this works.
- Ensure that wild fish are given proper protection under law, not just in SACs. SNH should do its job properly. Marine Scotland's obvious conflict of interest should be addressed head-on. Stop the illegal use of ADDs where they disturb cetaceans.
- Close the gap between the Local Planning Authorities that abrogate responsibility for assessing risk (by saying MS gives them no advice on its significance), and MS, that says it lacks data to give such guidance. This gap is where responsibility and accountability are shirked, and where the avoidance of applying the precautionary principle is putting our environment at risk.
- Pause expansion until the regulators have caught up with the industry's problems and its 21% non-compliance (SEPA, 2015<sup>1</sup>). Restore 'arms-length' regulation, end soft-touch enforcement, self-policing and the cosy relationships between industry and regulators.
- Phase out the AZE system, so aquaculture pollutes no more than other industries. Move or close older farms that do not fit the new standards.
- Help repair public trust and enable responsible management by complete transparency: Disclosure all harmful aspects of a farm's activities (lice, escapes, treatments, disease, ADD usage, mortalities etc), in real-time throughout its operational life. Publish proactively (as FOI law requires). Consult communities from pre-application, through the whole permitting process - this needs to be democratic, transparent and with decision-making shared between statutory consultees and communities. Proper weight should be given to objections.
- End the de facto presumption in favour of development, enabled by ignorance about the environmental impacts. Coastal communities are disempowered by having one month to respond to plans fine-tuned over many months.

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<sup>1</sup> <https://www.sepaview.com/2017/06/a-framework-for-a-sustainable-future-for-finish-aquaculture-in-scotland/>