



Roseanna Cunningham MSP  
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Cabinet Secretary for the Rural Economy

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Dear Ministers

**Regulation of salmon farming with particular reference to impacts on wild salmon and sea trout**

In their 2018 reports into salmon farming, both the Environment, Climate Change and Land Reform Committee and the Rural Economy and Connectivity Committee concluded that the regulation of salmon farming was inadequate and not fit for purpose, particularly in terms of protecting wild fish from negative impacts.

There is considerable concern that the recommendations to the Cabinet Secretary on salmon farming regulation that will emerge from the Salmon Interactions Working Group (SIWG) may fall far short of what is required and thus will fail to give urgently required protection to wild fish. You will be aware that none of the members of the Missing Salmon Alliance (MSA), which includes the Atlantic Salmon Trust, Salmon and Trout Conservation Scotland, the Angling Trust and the Game and Wildlife Conservation Trust, were represented within SIWG. Indeed, wild fish representation on SIWG was restricted to those with a somewhat limited mandate.

The four members of the MSA carry between them a very substantial mandate.

They have recently adopted a joint formal position on salmon farming regulation:

Regulation must include:

1. The clear identification of a Scottish public authority with the statutory function of protecting wild fish from the negative interactions of salmon farming.
2. The introduction of an effective, robust and enforceable regulatory system for all salmon farms, to protect wild migratory fish and proactively address all and any negative impacts associated with salmon aquaculture, including much stricter 'backstop' limits for on-farm sea lice numbers, coupled with independent monitoring and strict enforcement in the event of breaches, to curtail the damage being caused to wild salmon and sea trout by salmon farming. The 'backstop' limits should be set at an average of 0.5 adult female lice per farmed fish on any particular farm, with the limit dropping to 0.1 during wild smolt emigration between February and June, but this would not prevent adaptive management requiring lower lice levels on particular farms if that was required.

3. A genuinely precautionary approach to the licensing and permitting of any new salmon farms or expansion of existing farms.
4. A review of the permitted biomass and location of all existing salmon farms as against their environmental impact, with a mechanism to compel reductions in biomass and relocation where appropriate.
5. Full transparency on the environmental impact of fish farming, including the 'real time' publication of on- farm sea-lice, escapes of farmed fish, use of all treatment chemicals (whether on-farm or in well boats), farmed fish mortalities and disease information.
6. A requirement that no salmon farming development be permitted without the prior completion of a rigorous independent cost benefit analysis of the potential impact on coastal communities, including the impact on existing local businesses and ecosystem services.
7. Any adaptive management of fish farms, to be based on monitoring of wild fish, must be robust, independent, transparent and open to public scrutiny, with clear thresholds and deadlines for rapid action on-farm where problems are identified or suspected, and an appropriate regulator charged with enforcement of such management measures.

MSA members have now individually published the above position:

<https://anglingtrustcampaigns.net/blog/missing-salmon-alliance-update>

<https://atlanticsalmontrust.org/aquaculture/>

<https://www.gwct.org.uk/fishing/msa/position-statement-on-the-tighter-regulation-of-salmon-farming/>

<https://www.salmon-trout.org/2020/03/25/missing-salmon-alliance-urgent-implementation-of-new-system-of-regulation-for-fish-farms/>

Members of the MSA therefore request that Scottish Government also adopts the same position as MSA, as you consider how to proceed with salmon farming regulation.

Given the perilous state of wild salmonid populations, members of the MSA believe robust Government action, in line with this position, is urgently required and anything weaker will not protect wild fish sufficiently.

Yours sincerely



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Edward Mountain MSP, Convener REC Committee  
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Cathy Tilbrook, Nick Halfhide, SNH  
Alan Wells, Fisheries Management Scotland  
Sam Collin, Scottish Wildlife Trust