Statement on Fish Farming in Skye & Lochalsh

In the context of the Scottish Government's recent announcement aiming to see a doubling of production from Scottish salmon farms there has been a significant number of applications for new leases for salmon farm sites around the coast of Skye & Lochalsh. At present there is no specific strategic overview for the scope and sustainability of fish farming in and around Skye & Lochalsh and the Highland Council's Planning Department has indicated that it is unlikely to undertake such a review in the immediate future. Hence, all current applications are being considered on a case by case basis. This approach has led to a considerable amount of concern across the community about the landscape and environmental impact that such developments might pose, and has produced some heated debate on the subject, often in the local press. It is SLEF's opinion that the current process is not an appropriate way in which to control and manage sustainable development, especially in an area of relatively pristine marine and coastal environment. SLEF proposes the following as an interim method of managing this issue until such time as a more rigorous and strategic review of the resource, environment and impact can be undertaken:

The Precautionary Principle should be applied – i.e. where an application is submitted the developer should be required to undertake a full assessment of the environment in and around (due to tidal dispersion) the proposed site to identify if there are any protected or priority habitats and species present that might be affected by fish farming. Particular attention should be paid to communities of the seabed and species they support. Applicants should also be required to undertake a full landscape impact assessment to allow a proper evaluation of the implications of the proposed development upon the local landscape, which is a critical driver of the tourism industry and significant contributor to human wellbeing.

This approach does not presume either a pro or anti stance on the future development of salmon farms around Skye & Lochalsh which are recognised as making a significant contribution to the local economy at the present time. Importantly it attempts to ensure that if a development is proposed adequate and appropriate assessment is carried out to ensure that the area's natural environment is not negatively impacted. The need for such an approach is based upon the relatively limited knowledge base of key priority protected species (marine and inter-tidal), habitats and their distribution. The introduction of appropriate mitigation measures combined with independent monitoring, including possible relocation of applications to less sensitive sites, will hopefully not only protect these habitats and species, but will significantly add to our knowledge of their ecology, distribution and their successful survival.

This information would inform a more strategic policy on the future development of fish farming in Skye & Lochalsh. To that end the introduction of mitigation measures in the form of enclosed systems with filtering, either terrestrially or marine, would have benefits for our marine ecosystems by removing pollution in the form of faeces, waste food and medicines, eliminating sea lice infestations, containing disease, preventing approaches from predatory animals and eliminating mass escapes of salmon. Where landscape issues predominate, closed container fish farms could be located close to ports with the advantage of continuing employment and access to road and rail facilities enhancing product distribution. This approach would provide jobs in an area of declining manufacture, where ship building orders are reducing, closed containers could be built and fish farm jobs would be maintained without impinging on an ecologically important ecosystem.

In the interim the following approach should be taken when deciding whether or not consent should be granted and what conditions should be applied:

Application

Appoint Independent Environmental/Landscape Consultants

Significant Priority Habitats & Species & Designations

Designated Landscape

Independent Environmental & Landscape Assessment

No Priority Habitats & Species

Insignificant Landscape Impact

Negotiate appropriate monitoring and mitigation procedures with interested parties

Insufficient Procedures

Submit Monitoring & Mitigation Procedures

Appropriate Procedures

Application Considered for Approval

Undertake agreed monitoring and mitigation procedures while operating the site

Significant Impact Recorded

Review Monitoring Results and Reassess Permission after agreed time period

Some Impact Recorded but Amended Monitoring & Mitigation Procedures Negotiated

No Impact Recorded

Insufficient Procedures

Submit Revised Monitoring & Mitigation Procedures

Appropriate Procedures

Application or Continuation Rejected

Continue Site Operation with ongoing Monitoring & Mitigation procedures