

## Written evidence submitted by Dr Sally Campbell

Unfortunately I am unable to attend the pre-meeting in Inverness on Monday 2 December 2013, so I wished to record for you my thoughts on the present role of the Crown Estate in the eyes of many small marine groups around the West of Scotland. There is concern that the Crown Estate continues to grant leases for aquaculture, in particular salmon fish farms, without due consideration for sustainability of ecosystems in pristine locations, and in areas where wild salmon run. This damages small marine communities dependent on tourism of many sorts.

The prime concern remains the ease with which finfish farming is being granted approval by local authorities either for enlargement or new sites. Objections by stakeholders are ignored. Of particular concern are the mammoth farms being proposed, both in sea lochs and more open water. The model for “dilute and disperse assimilation of faecal, chemical and food waste” is inadequate. It appears most local councillors have insufficient ecological and chemical knowledge to make a balanced judgement of the planning application; and further, and most disappointingly, SEPA and SNH are not following any Precautionary Principle as advocated under the MSFD and GES. Whilst I do understand for regulatory reasons the Crown Estate has passed the role of making a judgement and delivering a ruling on to planning committees of local authorities in Scotland, it still grants the leases, so retains the power to question.

Some local authorities are being persuaded by the salmon companies not to insist on an EIA. This is appalling and surely a condition of receiving a lease must be that a satisfactory EIA had been completed before planning. This must include those farms consented years ago before EIAs for major projects were a discretionary or mandatory requirement, and certainly prior to these much larger farms being envisaged. A recent approval by a western isles council was for a farm in the Hebrides. Here an EIA had been completed which frankly would never be deemed acceptable if read by competent assessors. In parts it is more PR than EIA. In another example, this time of questionable incentives the promise of cash (£50,000 when planning approved and £10,000 per year afterwards) to a small community smacks of downright manipulation and a degree of corruption in its widest sense.

**In such cases the Crown Estate should be completing a due diligence to ensure that no undue bias has been exerted to influence the planning process. Small marine communities do not have either the money, lobbying power or in many areas the knowledge, to counteract the push by the multinational finfish farmers with their lobbying and extensive influence in government in Scotland. It is up to the Crown Estate to satisfy itself that these small communities fully appreciate the economic, social and environmental implications of these developments prior to planning decisions being taken**

The whole issue of leases is a difficult one and many small marine communities do not wish to have their seabed taken over and certainly not in perpetuity. The sea is a commons not for privatisation by the few, wealthy and consequently politically powerful companies. We all know by now the problem in wild salmon rivers with fish lice on smolts. Many of these communities depend to a large extent on tourism and farming. Recreational diving, recreational fishing in sea lochs, their rivers and estuaries, yachting, marine mammal watching and creeling, all activities in inshore waters, are growing in importance creating valuable and reliable cash revenues for small marine communities. Suddenly cutting off large areas of attractive diving, creeling and viewing coastline is counterproductive for those communities, despite the PR of the salmon companies

What I wrote to Gareth Baird after the meeting in September 2012 stills holds true:

**It is important that local communities are involved in stakeholder communication at all times; after all it is us that suffers from environmental pollution, finfish disease for virtually no return when our economy is tourism based, and profits from multinational finfish farms goes off shore, offering little except a few low value jobs locally. Dilute and disperse environmental control has been banned on land for years, as you yourself will know as a farmer. Why should the**

**community pay for the pollution of finfish farms? There is still much to be done in stakeholder communication**

**Further important considerations with finfish farms are:**

- **All finfish farms must be in possession of EIAs, even where renewing leases**
- **Communities must, of right, be informed of finfish disease, not wait for FOI requests to be answered**
- **The need to look at wider environmental, social and economic sustainability, with the Precautionary Principle being applied before any lease of seabed is granted**

A quote from Gareth Baird on his reappointment as Scottish Commissioner in September 2013:

*The Crown Estate has responded to feedback about how we work in Scotland, resulting in better communication and joint-working with communities, politicians and business.*

To many in small marine communities there is still much to be achieved in better communications. It appears that large, powerful businesses take priority every time. So in order to have that key role in better communications there are two important aspects:

- **Long term sustainable businesses and communities: economically, socially and environmentally. It is important that The Crown Estate continues to see sustainability in those 3 dimensions, not just short-term economic gain for the UK Treasury.**
- **It is vital that The Crown Estate remains independent of political alliances, key developers, multinational businesses etc. Safeguarding SSSI and pristine environments using the Precautionary Principle must be an important part of their duty of care.**

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