

Written Submission from Scottish Salmon Producers' Organisation

Introduction

Scottish farmed-salmon is a major sector of the Scottish food and drink industry. It is strategically important nationally and to local economies and employment in some of Scotland's most fragile west-coast rural areas and in the northern and western islands. It also makes important contributions elsewhere in the country, for example through fish processing and manufacturing, ship building, equipment engineering, feed compounding and logistics. In scale, the industry is a significant contributor to the Scottish economy; it is larger in product value than the fishing industry and on a par with the beef sector, the largest sector in the Scottish agriculture industry.

The Scottish Salmon Producers' Organisation (SSPO), which represents the farmed-salmon industry, welcomes the opportunity to give evidence to the RACCE Committee, to comment on the draft NPF3 and address the call for views on whether the NPF3 will help to deliver:

- a) a sustainable rural Scotland; and
- b) Scotland's climate change targets, the policies and proposals set out in the RRP2 document, and the Scottish draft Climate Adaptation Programme.

We have approached these questions from a food-industry standpoint, but as an industry for which the intimate linkage between the economic, social and environment aspects of sustainability is fundamental to business success.

Comments on Draft NPF3

We should first say that we consider the NPF3 is an ambitious and well constructed document. We are very supportive of its overall goals. Some people may argue that the document does not provide very much detail, and we would accept that. However, we consider the authors have achieved a balance in providing an accessible high-level strategic framework. Details will follow in other documents, including the strategic and local development plans and the next iteration of Scotland's National Marine Plan, but the NPF3 helpfully sets out the overarching framework.

On specific points, we believe the NPF3's approach of bringing planning, socio-economic and environmental objectives within the same framework is to be applauded. We think the focus on the city regions and rural towns is logical and we strongly support the main strands of the document's vision (in paragraph 1.2), and the expressed intention of bringing the NPF3 and the National Marine Plan into close association (paragraph 2.29).

We strongly support the case for strategic development of Scotland's remote rural coastal and islands areas, and consider progress in this will depend on closely linking marine planning and on-shore infrastructure planning, as is envisaged in the NPF3 document.

We welcome the document's support for the continued development of Scottish aquaculture, in line Scotland's National Marine Plan. However, we are somewhat surprised and rather disappointed that the document fails to set out the strategic policy basis for this planned development.

There are, in fact, major EU-wide policies for the strategic development of aquaculture, in which Scotland is a leading player. These are fully set out in the joint Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - '*Strategic Guidelines for the Future Sustainable Development of EU Aquaculture*' (COM(2013) 229 final, Brussels 29-4-2013). These policies have been a major feature of the 2013 Common Fisheries Policy (CFP) reforms and have generally informed the aquaculture sections of Scotland's National Marine Plan. **We strongly commend this EU document to the RACCE Committee's attention.**

On a detail, we note that the Scottish Environment Link's evidence to the RACCE Committee on the 29 January massively overstates the projected expansion in finfish farming contained in the NPF3 timeline. (In fact the projected 2020 figure is only 23% greater than the Scotland's previous peak production, in 2003.)

RACCE Committee Questions

The NPF3 has necessarily been prepared within the existing framework of Scottish Government policies and strategies. These include the economic strategy, the climate change policies, the land use strategy, the forestry strategy, the food and drink strategy, the strategic framework for Scottish aquaculture, and others.

Thus, the two questions on which the RACCE Committee has asked for views touch not only on the NPF3 itself but also, in part, on the policies and strategies that underpin it.

To the specific question of whether the NPF3 '*will help to deliver*' a sustainable rural Scotland and will '*help to deliver*' the climate change targets, our answer would be an unequivocal 'yes'. Within the range of the policies and strategies that are in place, the NPF3 makes a very constructive and considered contribution to policy aims, expressed in terms of a planning and development framework.

However, if the RACCE Committee's questions are interpreted in terms of '*will a sustainable rural Scotland be delivered*' or '*will the climate change targets be delivered*' we would have more uncertainty in our response.

Considered objectively, the 2050 emission reduction targets are hugely challenging and, whilst very good Scottish progress has been made to date, the ultimate achievement of an 80% reduction in emissions will depend on the emergence and deployment of technologies that have not yet been discovered. This inevitably leaves some uncertainty about the future, although across all sectors of industry companies are moving forward positively to address the climate change agenda.

Fish farming (both finfish and shellfish) is very fortunate. It is very highly efficient in resource use and has the lowest carbon footprint of any comparable protein-food production system. Additionally, the Scottish industry has undertaken an energy

audit across the salmon sector and companies are already adopting decarbonisation programmes and innovations in packaging, logistics and recycling.

In regard to '*will a rural sustainability be delivered*', we can provide a clearly stated position. We believe the long-term economic strength, particularly of remote and economically fragile rural areas, depends on their sustainable use of natural resources (including land, freshwater and coastal marine waters) for agriculture, fish farming, fishing, forestry and recreation/tourism activities. We therefore welcome the fact that the NPF3 has adopted an approach that is consistent with this position.

However, we would make the point (at paragraph 4.2) that one of Scotland's greatest natural assets is the quality of its 'prime aquaculture waters' - the coastal marine waters, particularly on the northwest coast and in the islands. These provide Scotland with a leading EU and global position in finfish and shellfish farming. They are a crucial national resource and we believe should be prioritised for aquaculture development. We agree that the physical assets of land are important but note over 51% of that resource is rough grazing, suitable predominantly for extensive cattle and sheep production.

Our chief uncertainty (and concern) lies in the fact that whilst the 2050 challenge of global climate change has been widely recognised and adopted into EU and Scottish Government policy, the parallel challenge of providing global food security has not received the same policy attention. The NPF3 incorporates aspects of food policy but only in the narrow socio-economic dimensions of the Scottish food and drink policy.

Over coming years the tightening position with regard to global food security is likely to lead to shortfalls in food supply in developing countries, and to increased prices and associated cost-related reductions in consumer choice and diet quality in most developed economies. Against this background, we believe that there should be a clear Scottish policy to increase food production and to capitalise on the positive effects that climate change will bestow on Scottish growing conditions. (We believe this an area to which the RACCE Committee might direct its longer term consideration.)

At present there appear to be some potential conflicts between different strands of the NPF3's underlying policies (for example, between the forestry policy and the future development of upland farming) and between some planned developments and food production objectives (for example between aquaculture and inshore renewable energy). These issues would be more readily addressed in both policy and planning terms – and in regard to rural sustainability – if Scotland had a clearly articulated position on its role in the achievement of global food security.