

Public Audit and Post-Legislative Scrutiny Committee

Post-legislative Scrutiny: Biodiversity and Biodiversity Reporting Duties

Further written submission from Salmon and Trout Conservation Scotland

Further to the earlier written submission from the Salmon & Trout Conservation Scotland, the Committee's attention is now drawn to the report of the Environment Climate Change and Land Reform Committee of 5th March 2018 into the environmental impacts of salmon farming.

Of relevance here is the conclusion of that Committee, per the letter of 5th March from the Convenor, Graeme Dey MSP, to the Convener of the Rural Economy and Connectivity Committee, Edward Mountain MSP, that:

"The role, responsibilities and interaction of agencies requires review and agencies need to be appropriately funded and resourced to fully meet their environmental duties and obligations. Scotland's public bodies have a duty to protect biodiversity and this must be to the fore when considering the expansion of the sector. We need to progress on the basis of the precautionary principle and agencies need to work together more effectively."

At paragraph 90 of the Report:

"The committee is unclear all agencies are fully discharging their duty in the Nature Conservation Scotland Act 2004 to further the conservation of biodiversity with respect to salmon farming."

At paragraph 309 of the Report:

"The committee is unclear if in practice all the public bodies involved in the regulation of salmon farming have the biodiversity duty to the fore. The committee is not convinced that the precautionary principle underpins the development and expansion of the sector."

At paragraph 311 of the Report:

"The committee considers the current regulatory process does not give significant consideration to the impact of salmon farming on wild salmonids."

We hope this further assists the Committee in its post-legislative scrutiny of the 2004 Act.