

# Submission of written evidence from Dennis Archer

2 April 2025

Dear RAI Committee Members

I thank you for all the hard work that has gone into the Report on the recent inquiry into salmon farming in Scotland. I thank you also for stimulating the enlightened debate which took place in Holyrood on 20th March. I thank you for bringing enquiring, open minds to this complex activity.

I want to comment, as an active participant in the work of Coastal Communities Network but not officially speaking for it, on a couple of points mentioned in the Response by the Salmon Sector to your Report.

First, the statement: 'The only recent new start salmon production business has been stopped by bureaucracy, red tape and the regulatory burden'. This is only a very small part of the picture concerning Organic Sea Harvest (OSH).

The bureaucracy, red tape and regulatory burden do not weigh so heavily on every salmon farm application. The reason they did so on Skye was because there was intense local opposition to the applications for these farms. They were unwelcome and thought to be in the wrong place, provoking determined campaigns against them to counter strong support from the Highland Council planning officer and some of the regulators.

There are two more reasons why OSH has collapsed. These are because they were unlucky and they were not very good at the business of salmon farming. They were unlucky in experiencing adverse conditions. There is plenty of evidence that they were not good at their business to be found in the Fish Health Inspectorate reports on the visits they made during the many and continuous mortality events at Invertope and even worse at Culnacnoc. The mortality figures at the latter were beyond belief.

Those of us who spend much of our time trying to achieve meaningful reform of the practice of salmon farming would have liked to correct the bare statement about the causes of the failure of OSH printed in the local press. However, we agreed amongst ourselves not to do so at the time out of respect for the workers who had lost their jobs. We let the half truths pass because we are reasonable and caring people. When the same ideas are paraded before a parliamentary committee, it is necessary to speak out.

A related, second problematic statement is: 'Business would rather a no, than for decisions to take years'. The very reason that OSH felt such a regulatory burden is precisely that they never would take 'no' for an answer. At Flodigarry, they were given a 'no' four times and still they have made a further appeal against the latest

refusal, making a fifth attempt. They were told 'no' three times at Balmaqueen, but still they persisted over a period of about five years.

Loch Long Salmn were given a 'no' by the relevant National Park authority. They didn't prefer it to a long drawn out battle.

The fact is that the salmon farming industry does not like to hear a 'no'. They almost invariably appeal against it. In fact, the industry is only ever happy when it gets exactly what it wants. It has been encouraged to be like that by enjoying government support and protection at every turn for many years. Currently, they are probably expecting to get their own way in the matter of 210 appeals against the government regulator of sea lice.

Smart money is on a draw in this case. Nobody will be happy.

I wish you well as you continue to track progress with an update in September and an examination of developments in a year's time. I don't believe that the actions promised in that time will have much impact even if they are delivered. The larger issues have already been shelved.

Yours sincerely

Dennis Archer

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