



The Scottish Parliament
Pàrlamaid na h-Alba

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Roseanna Cunningham MSP
Cabinet Secretary for Environment, Climate Change, and Land Reform
By Email

Wednesday 20th May 2020

Dear Cabinet Secretary,

Proposed trial of Ectosan at Ardnish salmon farm

I am writing to you to raise my concerns over recent reports that Imidacloprid (brand name Ectosan), a neonicotinoid pesticide, may be trialled in Scottish Fish Farms. Following initial information released in March showing industry lobbying to use Ectosan, today I learned that Mowi have approached Sepa in regards to trialling the chemical at their salmon farm at Ardnish.

I am deeply concerned at this proposal and would like clarification over how this request for a trial of Ectosan will be handled, and if there have been any other requests to trial this chemical in Scotland. I would also ask that you share any information the Scottish Government have received over the safety of Ectosan in the marine environment, including trials in other countries.

Furthermore, I would like to remind you of the recommendations of the joint inquiry into salmon farming in Scotland, conducted in 2018 by the Rural Economy and Environment, Climate Change and Land Reform Committees. These recommendations included stronger measures on the use of medicines and chemicals in salmon farms, including addressing the data and analysis gaps related to the discharge of medicines and chemicals into the environment; the call on Sepa and the Scottish Government to consider the environmental impact of medicines used by the industry; and recommendation to make information and data on medicine use by the industry publicly available. I would like to ask how these recommendations are being taken into account in the handling of this request to trial Ectosan in Scotland.

I need not remind you that the European Commission previously banned the use of neonicotinoids on plants in 2018 due to its risk to bees. Imidacloprid has been classed as an 'environmental hazard by US government scientists, who have warned that it could be 'very toxic to aquatic life with long lasting effects'. I also understand that the Rivers Trust, which represents river management bodies in England, Wales and Ireland, has warned that neonicotinoids in our rivers endanger the lives of insects, birds and fish.

The experience of emamectin in Scotland reinforced the importance of the precautionary principle, and ensuring that new chemicals do not have a detrimental impact on marine ecosystems or animal welfare prior to their use in Scotland's waters. Allowing wide spread use of a chemical, only to roll back on it at a later stage, does not only cause untold damage to our seas and wildlife, but also makes it extremely difficult to effectively bring about change in the industry.

The global biodiversity crisis we face means it has never been more important that Scotland faces up to its responsibility to protect wildlife and habitats. If there is any evidence at all that Ectosan has a detrimental impact on our marine ecosystems, it is not acceptable for in-situ trials to take place in Scotland's waters.

I would appreciate any update you are able to provide on this issue, in addition to responding to my questions above.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Ruskell', with a horizontal line underneath.

Mark Ruskell

MSP for Mid Scotland and Fife