

Salmon-farming Scoping Exercise - Engagement Report



Falkland Islands Government
Department of Natural Resources

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Overview

The Falkland Islands Government (FIG) is in the process of considering the potential for the future development of large-scale commercial salmon-farming activities in Falkland Islands waters. An in-depth public consultation on a set of development proposals, including a proposal that large-scale salmon-farming is not permitted, is planned for mid-2025.

In advance of that consultation process, FIG ran a scoping exercise from 04 November to 01 December 2024, to establish what additional information and evidence the public and stakeholder groups want to see included within the range of materials and aspects to be considered.

The main objectives of the scoping process were to identify any:

- environmental, social or economic aspects or effects not already identified for evaluation in the socio-economic impact assessment;
- additional data sources or evidence to be included for consideration as part of the public consultation;
- additional concerns about large-scale development not already identified for consideration;
- comments about the proposed public consultation methodology.

A total of 55 digital and paper responses were returned and further opinion and comments were received via written submissions and reports from members of the public and stakeholder groups.

A summary of responses received is presented in this report. The comments and considerations raised by stakeholders and the public will be used to inform the materials and information presented for consideration during the public consultation later this year.



Table 1: Demographic profile of respondents

		%	n
Respondent category	Member of the public	90.2%	46
	Owner or representative of a business/organisation	7.8%	4
	Other	2.0%	1
Length of time living in the Islands	Less than 1 year	0.0%	0
	1-5 years	5.9%	3
	6-10 years	13.7%	7
	11-20 years	15.7%	8
	More than 20 Years	64.7%	33
Location	Stanley	76.5%	39
	East Falkland	5.9%	3
	West Falkland	2.0%	1
	An Outer Island	7.8%	4
	MPC	0.0%	0
	Other	7.8%	4
Sector	Agriculture		1
	Agriculture/Agri-tourism		4
	Agriculture/Agri-tourism/Conservation/Environmental Protection/Environmental research/science		1
	Agriculture/Agri-tourism/Government		1
	Agriculture/retired		1
	Aviation/Air Transport		2
	Business Services		7
	Childcare		1
	Conservation/Environmental Protection		4
	Conservation/Environmental Protection/Environmental research/science		1
	Construction or Trade		1
	Education		3
	Finance		1
	Fishing		5
	Fishing/Tourism		1
	Fishing/Wholesale or retail trade		1
	Government		4
	Health		1
	Hospitality		1
	Medical		1
	Oil and gas		1
	Retired		1
	Tourism industry		2



Planned Consultation Materials: Reports produced by Macalister Elliott and Partners (MEP) Ltd

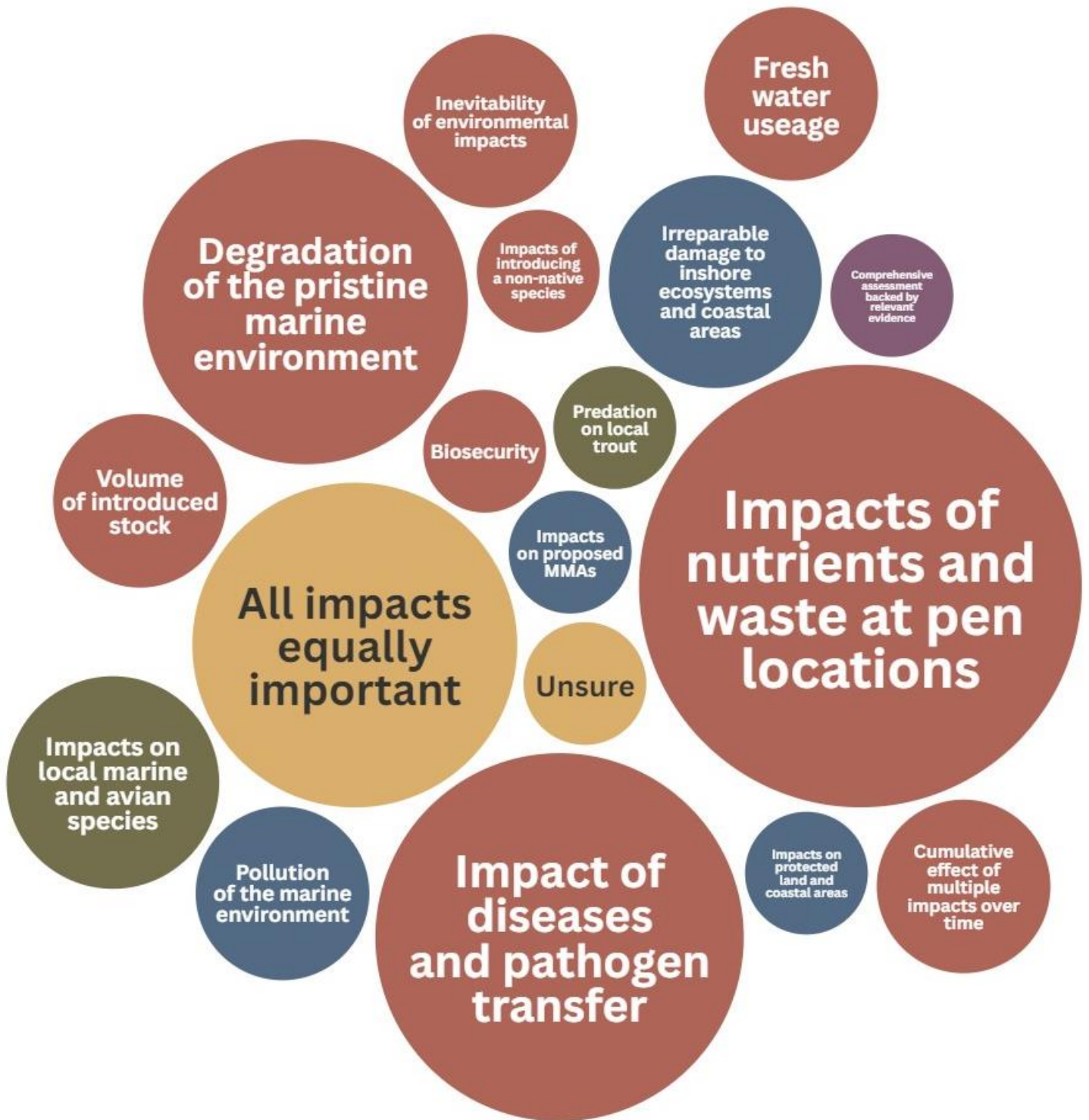
In total, 32 respondents provided comments relating to environmental impacts not covered in the MEP report that should be included for assessment. Table 2 shows the themes and subthemes that emerged. Figure 1 overleaf shows the frequency of themes identified as being of the greatest concern or importance.

Table 2: Environmental impacts respondents indicated should be included for assessment

Theme	Subtheme	Frequency
Impacts on existing marine species	Impacts on local marine and avian species	8
	Impacts on cetacean and pinniped populations e.g. entanglement risks	4
	Impacts on proposed MMAs	2
	Predation on commercially fished species	1
Impacts on protected land, marine, and coastal areas	Impacts on commercially fished species	1
	Impacts on protected land and coastal areas	1
Impacts on the green economy	Holistic impacts on Falkland Islands environment and other sectors i.e. tourism	3
Operational and infrastructure impacts	Impacts of antimicrobial/antibiotic use	6
	Include assessment of operational impacts e.g. pollution, energy, fuel, equipment, noise, light, visual impacts	5
	Carbon emissions from increased economic activity	4
	Impacts of nutrients and waste at pen locations	4
	Indirect environmental impacts through use of feed/operational materials with high production-related environmental impacts	2
	Effects of associated wastes	1
	Environment impacts of additional infrastructure needed	1
	Impact of diseases and pathogen transfer	1
	Impacts of introducing a non-native species	1
	Visual impact of infrastructure	1
Provide a comprehensive evidence base for decision-making	All environmental impacts need to be assessed comprehensively and backed by relevant and appropriate evidence	2
	Assess alternative approaches e.g. land-based aquaponics	1
	Assess impacts from a local, natural environmental perspective, not an industry perspective	1
	Explicitly state where evidence on impacts is not available or assessed	1
	Include lessons learned on environmental impacts from other jurisdictions	1
	Ongoing environmental monitoring and evaluation	1
Other	Anything detrimental to the environment	1



Figure 1: Environmental impacts identified as being of the greatest concern or importance





In total, 37 respondents provided comments relating to case studies from other global producers or jurisdictions that should be considered when reviewing the case for the development of salmon-farming activities. Figure 2 shows the frequency of responses.

Figure 2: Case studies from other global producers or jurisdictions that respondents think should be considered





In total, 31 respondents provided comments relating to the scenarios to be included for consideration during the public consultation. Table 3 shows the themes and subthemes that emerged.

Table 3: Respondent comments on the scenarios included for consideration during the public consultation, by theme

Theme	Subtheme	Frequency
Explore other location options	Onshore farming could present a harm-reduction alternative	5
	Onshore opportunities	2
	Small-scale enclosed onshore aquaculture	2
	Small-scale onshore aquaculture	2
	A fully land-based Recirculating Aquaculture Systems (RAS)	1
	Far offshore sites	1
	Limit development to specific locations	1
	Link with oil rig sites to minimise impacts	1
	Present scenarios for all possible locations e.g. on land, inshore, offshore, rivers	1
Explore other aquaculture options	Look at other aquaculture alternatives i.e. kelp	1
More evidence and information needed for each scenario	Queried how carrying capacity is determined	2
	Need more specifics on the type of salmon farming proposed	1
	Need to assess the environmental risks before any decision on the proposals can be made	1
	Queried if other proposals can be considered	1
	Queried what is meant by 'organic'	1
	Trial a small-scale operation and only consider commercial farming after a comprehensive review of the evidence	1
No other scenarios proposed	No other scenarios proposed	7
Unsure	Unsure	1



Figure 3: Other jurisdictions respondents indicated should be considered when reviewing Falkland Islands legislation





Table 4: Other factors that respondents think should be considered when reviewing Falkland Islands legislation

Theme	Subtheme	Frequency
Additional factors to be considered	Environmental impact monitoring determines whether operations can continue	2
	Ongoing monitoring of environmental and socio-economic impacts	2
	Robust penalty regime	2
	Consider land-based operations	1
	Industry directors held personally responsible for environmental impacts	1
	Industry to pay into an environmental impact offsetting fund	1
	Need to consider the rights of coastal landowners	1
Process-related concerns	Unlikely that appropriate/effective legislation will be developed with current resources	2
	Consultation needs to present interactions with existing FIG policies, strategies, and legislation	1
	Consultation needs to present the full costs of industry regulation, from development to delivery	1
	Consultation needs to present the successes and failures of other jurisdictions to regulate industry	1
Other	Factors listed highlight why fish-farming is unacceptable	3
	Factors listed are insufficient/weak	1
	Regulation does not stop the damage	1
None	No additional factors	3



Planned Consultation Materials: Socio-economic Impact Assessment Report

In total, 29 respondents provided comments relating to other socio-economic impacts that should be included in the SEI assessment. Table 5 shows the themes and subthemes that emerged; note that the majority of comments identified aspects already included in the SEIA assessment.

Table 5: Socio-economic factors identified by respondents, for inclusion in the SEIA

Theme	Subtheme	Frequency
Additional factors to be considered	Impacts on medical services	4
	Impacts on education services	3
	Costs of setting up and providing ongoing regulation and enforcement of the industry	2
	Cumulative costs considered alongside other large-scale industry i.e. oil	2
	All processing of the end product should be done in the Islands	1
	Benefits to agricultural sector from potential synergies	1
	Health and disease impacts of increased population	1
	Impacts on education services, especially Camp education	1
	Impacts on international reputation	1
	Potential costs of future subsidies to the industry	1
Factors already included for consideration	Housing impacts	5
	Impacts on tourism	3
	Impacts on existing commercial fishery	2
	Impacts on existing economic activity	2
	Impacts on infrastructure	2
	Impacts on utilities	2
	Detailed infrastructure requirements	1
	Indirect impacts	1
	Labour market impacts	1
	Social impacts	1
Other	Present benefits alongside costs	2
	Focus on the negative impacts	1
	Reliance on technology over human workers	1

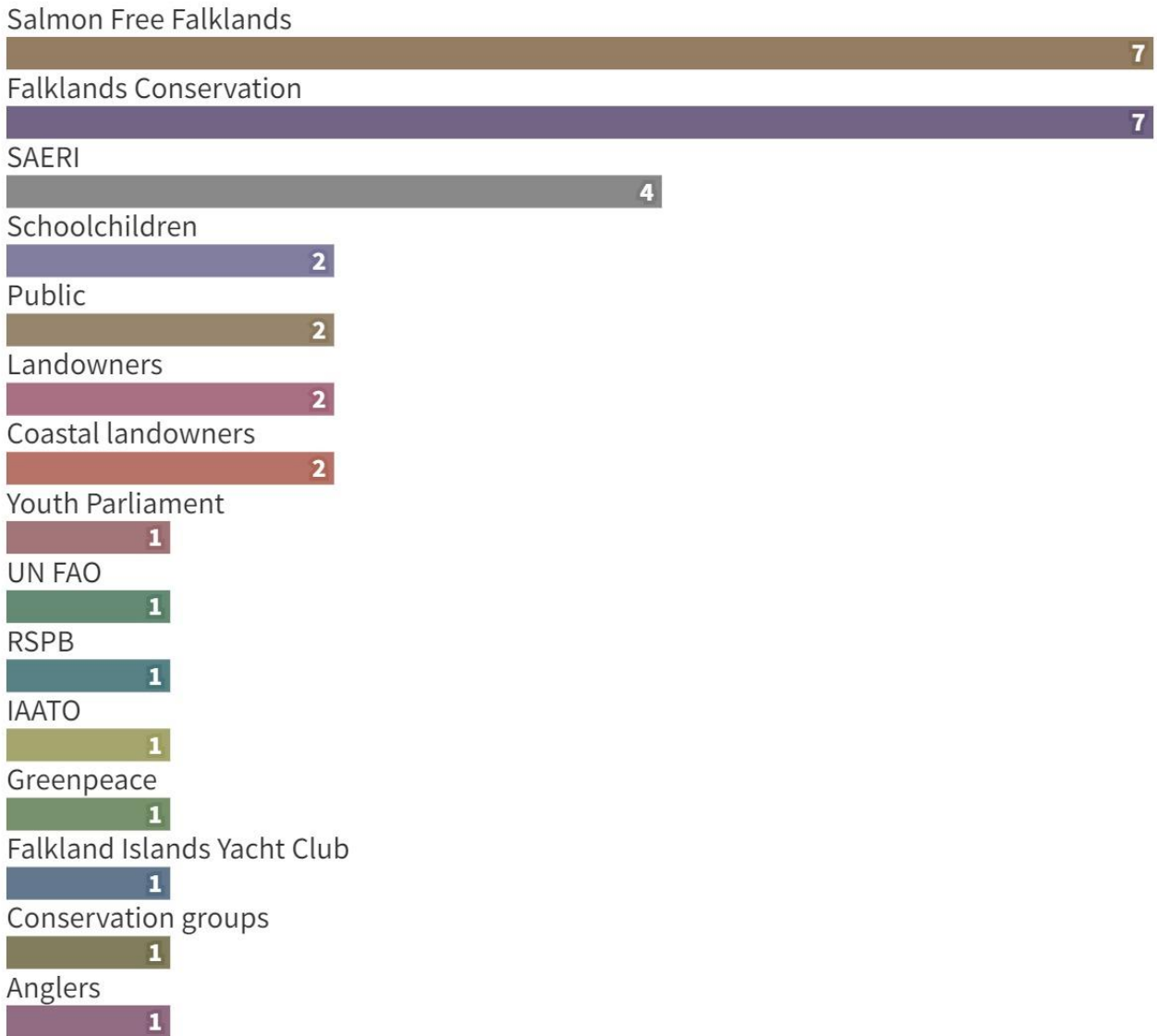


Figure 4: Socio-economic impacts of greatest concern identified by respondents





Figure 5: Stakeholders identified by respondents, that should be consulted with during the SEIA





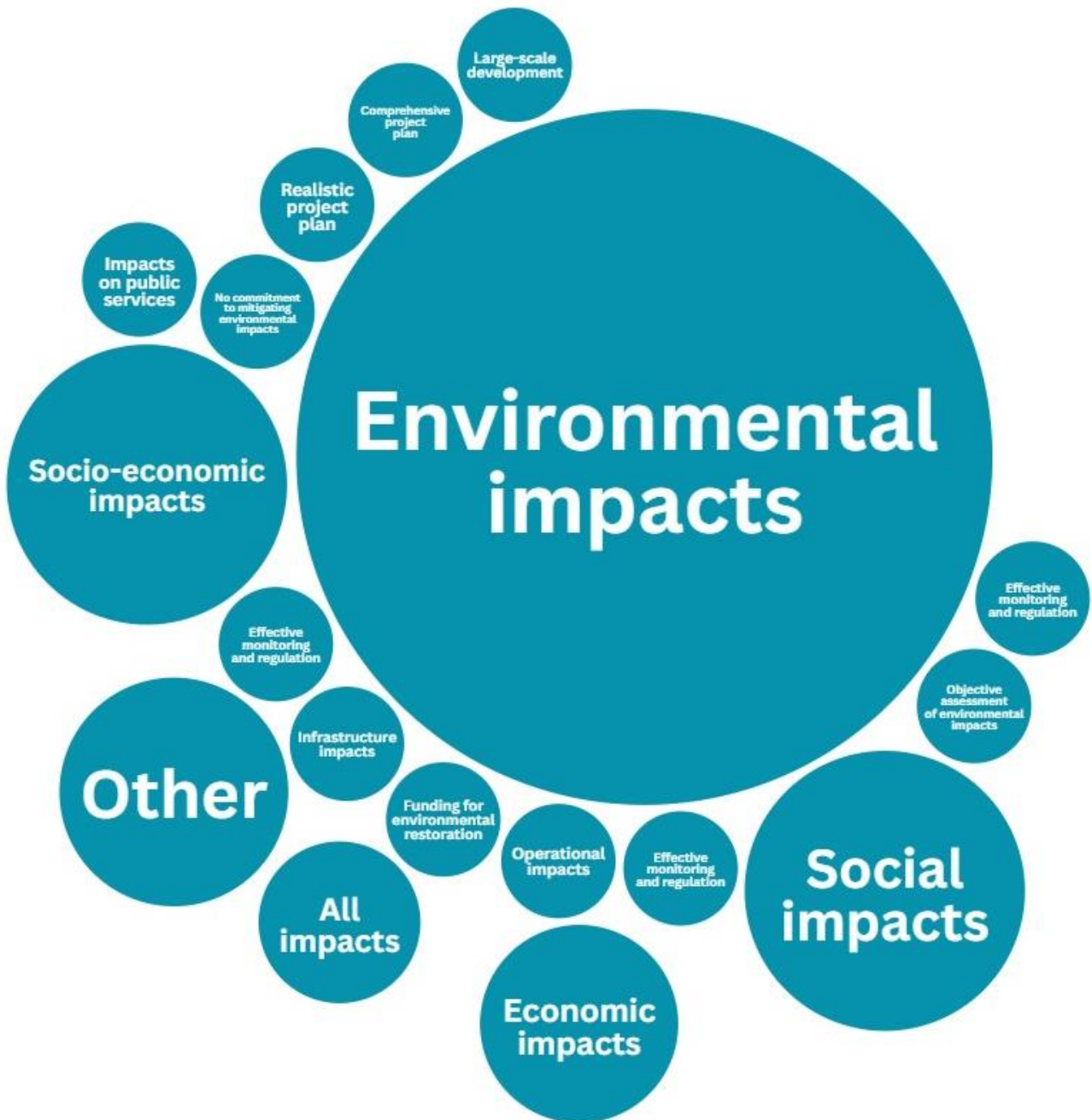
Planned Consultation Materials: Indicative project plan for a large-scale commercial salmon-farming operation

Table 6: Elements or considerations that should be included in an indicative project plan

Theme	Subtheme	Frequency
Detailed project description	Industry needs to provide comprehensive project details	1
Environmental impacts	Environmental impact of any proposed project is vital	2
	A full EIA required before any project can be considered	1
	Carbon footprint of development and ongoing operations	1
	Climate change impacts	1
	Consider indirect environmental effects e.g. aviation hazards by attracted seabirds	1
	Impacts on squid population	1
	Industry needs to demonstrate how they will safeguard the environment	1
	Industry plan for funding of environmental restoration	1
	Noise, light and visual impact considerations	1
	Waste management plan	1
Evidence-based proposals	Consider assessments and lessons learned from other jurisdictions	2
Facilities and locations	Options for land-based operations	1
	Proposals for Falklands-based processing	1
Resource and infrastructure requirements	Costs to FIG for enabling such a project	1
	Industry plan for funding decommissioning of infrastructure	1
	Use of organic systems and resources	1
Socio-economic impacts	Ensuring local labour is prioritised	1
	Industry plan for offsetting negative impacts on other fisheries	1
	Meeting increased need for education and health services	1
	Overall economic impact	1
None	None proposed	4
Other	Against any salmon farming project	1
	Decision on any project should be put to a public vote	1
	Queried a need for changes to immigration legislation	1
	Highlighted that any proposed project will be shaped by the regulatory framework developed	1
	Other	1



Figure 6: Aspects or components of a project plan for salmon-farming activities of the greatest concern or importance to respondents





Additional comments

Table 7: Additional comments by respondents in relation to the materials planned for inclusion in the consultation

Theme	Subtheme	Frequency
Content/quality of consultation materials	Highlighted environmental, health and education impacts	2
	Consultation materials need to be unbiased and provide objective, balanced information	1
	Consultation materials should clearly define the different types of salmon farming and what they involve	1
	Environmental impacts need to be assessed comprehensively	1
	Present balanced, objective evidence	1
	Present worst-case scenarios from other jurisdictions	1
Practical considerations	Provide simple, non-complex information for people to consider	3
	All information made available in hard copy	1
	Consultation needs to reach and hear from as many people as possible	1
	Process needs to be done properly and not rushed	1
Question-framing	Consultation should ask if large-scale fish farming should be permitted	1
	Consultation should ask what type of salmon farming, including 'none' is desired	1
	Consultation should be framed in terms of acceptable level of risk	1
	Provide clarity on whether environmental or socio-economic impacts are being consulted on	1
	Provide clarity on whether the decision is about fish farming more broadly, or salmon farming more specifically	1
Other	Against salmon farming	5
	The public is against salmon farming	3
	Past small-scale local aquaculture had negative impacts	2
	The issue should be decided by referendum	1