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Scottish Environment Protection Agency
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RE: Detailed proposals for a risk-based, spatial framework for managing interaction between sea lice from marine finfish farm developments and wild salmonids in Scotland

Dear SEPA Environment Team,

As you are aware, salmon and sea trout populations across Scotland and the North Atlantic have declined significantly in recent decades. Following two Parliamentary enquiries and the recommendations of the Salmon Interactions Working Group, we are extremely supportive of the work that SEPA have undertaken to develop a regulatory framework for managing interactions between sea lice from finfish farms and wild salmonids. We welcome the engagement that we have had with SEPA throughout the development of the framework, and we hope that SEPA will fully take into account our latest comments, which we have submitted through the online consultation portal.

Impacts on wild fish arising from sea lice are a function of both the number of host fish and the number of lice per fish. We therefore strongly endorse SEPA's proposed regulatory approach of managing overall lice numbers arising from fish farms through maintaining sea lice exposure below a critical threshold specifically identified for the protection of wild fish. We have highlighted in our detailed consultation response that we believe that the critical exposure threshold should be 0.65 lice m² days. Whilst we recognise that there are various aspects of the screening model which might be considered to be more or less precautionary, the threshold will inevitably also feature in the more refined models, so using the best available information at this stage is imperative.

Against the backdrop of the wild salmon and biodiversity crises, it is crucial that we manage existing impacts alongside considering applications for further development. With this in mind, we do not consider that the use of a 'no deterioration' condition for existing farms is appropriate, and we strongly feel that SEPA should be more ambitious. SEPA should therefore apply precautionary lice limits for existing farms from the outset. This would apply until such time as a bespoke lice limit could be defined for existing farms based on more refined modelling.

On sea trout, the proposed interim solution does not offer the required protection for sea trout. In our response, we have set out that SEPA should adopt an interim approach reflective of the lice limits applied to salmon but over a longer time period until a bespoke sea trout framework is developed.

The Salmon Interactions Working Group set out that the test for any new regulatory system should be that it is robust, transparent, enforceable and enforced. We have highlighted in our response where we feel that the proposed regulatory framework does not meet this test, and we urge SEPA to keep this in mind when implementing the framework.

The nature of the consultation questions mean that we have responded 'no' to many of the questions, but in reality our view is considerably more nuanced. We therefore wanted to emphasise that we strongly support the swift delivery of the regulatory framework. We have made a number of suggestions to make the process more robust, and we wish to see a shorter timeline for delivery. We will continue to engage with SEPA to support the implementation of a robust sea lice framework which protects our fragile wild salmon and sea trout populations from the impact of farm-derived sea lice.

Yours faithfully,

Fisheries Management Scotland