



10th September 2023

BTA Response on SEPA's Detailed Proposals for the Introduction of a Risk Based, Spatial Framework for Managing Interactions Between Sea Lice from Marine Fish Farm Developments and Wild Salmonids in Scotland

Dear Sir/Madam

I write on behalf of our Scottish members in response to SEPA's invitation to comment on this consultation.

The British Trout Association represents businesses that produce high quality rainbow trout in inland and coastal waters for direct consumption, value adding and restocking for recreational angling. Our Scottish marine farming members are directly responsible for the production of around 8,000 tonnes of high-quality rainbow trout which is consumed in the UK and internationally.

We take pride in supporting the local economy in the remote, rural areas in which we operate and in supporting the national economy. Our farmers recognise the importance of protecting vulnerable species through sustainable production practices, and they support the principle of environmental protection which we believe must be properly and fully balanced with the need for sustainable development.

Having been fully engaged in discussions with SEPA and others from the outset, we understand the background to the development of the proposed framework and the largely political nature of the drivers for this. It is now widely recognised that populations of wild salmon are in a parlous state right across their range, largely as a consequence of significant world-wide climate change and the impacts of this both on the deep oceans and on the inshore and freshwater habitats occupied by wild salmon. Ongoing reports serve to stress the critical nature of these impacts and there is now no doubt that wild salmon (and sea trout) are suffering as a consequence. The status of salmon and sea trout populations across the board, including in areas remote from marine fish farms, continues to decline. A wide range of factors, including those identified by Scottish Govt's Salmon Interactions Working Group, continue to contribute to the attrition of wild salmon populations, although there are few signs that significant efforts are being directed towards dealing with these, with the

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exception of sea lice from marine fish farms which has been singled out for special attention. This conveys a strong sense that the framework, as proposed, will be implemented mainly because it is politically convenient to do so, rather than because it is likely to have a significant effect on reversing documented declines. Plans to begin implementation next year further reinforce this sense of urgency on behalf of SEPA and Scottish Government.

The resource that has been devoted to developing the framework, including input from industry modellers and other experts, has been enormous. What has emerged is highly complex, largely theoretical, untested and based on many assumptions derived from literature rather than experience gained in the field. It gives no real indication of how the success, or otherwise, of its implementation will be measured.

We remain concerned that the framework has the potential to impact on the welfare of farmed fish especially in areas where wild salmon are considered to be at high risk, and we are disappointed that SEPA appears unconcerned about this aspect. While SEPA has claimed that their sole focus is on environmental protection and that fish health and welfare is not their responsibility, it is clear that the framework focuses exclusively on the health and welfare of wild salmonids, while largely ignoring welfare problems that its imposition may create for farmed fish. As a consequence, trout farmers may be placed in a position where the treatment of fish already compromised by, for example, gill challenges caused by naturally occurring algal blooms, micro jellyfish, etc. indicated by the framework's lice thresholds will further compromise health and welfare, with the added potential to increase the risk of mortality. This cannot reasonably be ignored.

As alluded to in the foregoing, the inshore marine environment is undergoing significant and ongoing change, increasing the pressures on farmed trout health and welfare and on trout farmers to maintain their fish in good condition. Increasing water temperatures result in greater threats to fish health at a time when treatment options available during the summer months are diminishing. The additionally restrictive lice limits imposed through the framework, coupled with additional enforcement measures may force the treatment of fish more frequently and earlier than is required, unnecessarily creating health and welfare issues and, potentially, increasing mortality; or risk non-compliance. It is important for SEPA to bear in mind that marine trout farmers now have a diminishing list of measures available to them to treat their fish for sea lice, especially when compared with salmon; and to recognise that, occasionally, unexplained increases in lice numbers may occur.



While we appreciate that it is proposed to use the framework as a screening tool and that emphasis has been placed on its 'adaptive' nature, we remain concerned that it will be implemented without any form of ground truthing or validation. Given ongoing concerns about the possible negative impacts of the framework and the consequences of the implementation of a largely theoretical scheme on day-to-day operations and future business planning and development, we believe that it is essential that it is comprehensively piloted in one or more nominal 'high risk' areas before consideration is given to it being rolled out more widely. BTA shares Salmon Scotland's concerns about the outstanding technical and scientific issues within the framework and we endorse their comments on these.

During the course of the development of the proposed sea lice framework and elsewhere, we have repeatedly stressed the position of smaller independent marine rainbow trout producers and the fact that schemes such as this treat them in the same manner as large, multinational businesses with substantial resources and expertise at their disposal. It is important to restate this point here - additional costs are seldom related to the size or scale of production of the business and costs that may arise as a consequence of any additional monitoring which may be required if screening so indicates may well be prohibitive for our smaller independent trout firms.

Yours sincerely

