**Crown Estate Scotland Response: Managing Interactions Between Finfish Farms and Wild Salmonids: A New Regulatory Framework.**

Thank you for the opportunity to comment on the revised framework for managing interactions between sealice on finfish farms and wild salmonids. Crown Estate Scotland wishes to provide the following overarching comments for consideration, rather than specific feedback on the questions posed in the consultation document. Since our comments relate to the overall approach, rather than technical detail, we consider that the most appropriate way to respond.

Given all the previous work that has been done through such groups as the Salmon Interactions Working Group, a framework for managing the interactions between sealice on finfish farms and wild salmonids is necessary. Crown Estate Scotland recognises that developing a framework that builds trust through collaborative working, that is open and transparent, that is proportionate and that is backed up with evidence is challenging and complex. That being the case, it is encouraging to see SEPA take steps to develop such a framework.

The framework is risk based, with the aim of being proportionate in regulating the interactions between farmed and wild salmon. The approach taken is to identify sites of risk rather than identifying areas for sealice management. Crown Estate Scotland recognises that there are benefits to this risk-based approach in that the aim is to be proportionate. However, identifying sites not at risk and applying a standard that is less than the industry’s own code of good practice, means relying heavily on modelling data and risks not applying the precautionary approach for those sites being given less stringent objectives.

Crown Estate Scotland realises that some sites, due to an historical legacy, are not in ideal locations and that further evidence is being gathered in priority WSPZs. Crown Estate Scotland would welcome discussion on how lease mechanisms may be able to help facilitate improvements to WSPZs, should they be needed.

There would be benefits in considering how the industry code of good practice for sealice management is to be applied or to be used in the future. For example;

* The industry code applies all year round and not just during the migration period. Crown Estate Scotland considers it would be prudent to have that as the default limit for sites within WSPZ’s that are not subject to further specific framework derived limits, where established disciplines can prevail during the sensitive period and beyond.
* Other countries, such as the Faroes, have year-round lice control requirements, akin to the industry CoGP here. This enables on-going control of infestation pressures that should make the sea-lice limits applying during the sensitive migratory period easier to reach. We acknowledge that year-round limits also put pressure on resources, including continued sensitivity of lice to veterinary therapeutants. However, such controls may be achievable through other means than applying a standard prescribed threshold over the year such as a strategic sustained pressure regime focussed around the sensitive period(s).
* The industry code has one standard, meaning it is easy for external stakeholders to understand compliance.

If the industry is unable to meet the code of good practice, a transparent log of action being taken and monitoring of impacts to back up mitigation needed could be introduced.

Crown Estate Scotland understands that the implementation of Environmental Management Plans (EMPS) through the planning process was an interim step before the development of a framework. There are however benefits that the EMPs were working to achieve, that should not be lost, and it would be of benefit to know how the benefits of the existing EMPs will be retained in the future framework. For example, there is local agreement and signatories to joint working, there are examples of where local boards and trusts have completed joint sealice monitoring with industry on sites and on wildfish. There are benefits to the EMP approach such as building trust that should be encouraged.

The framework describes how a collaborative approach will be used to develop a monitoring strategy and a monitoring plan. Crown Estate Scotland supports this approach and agrees that collaborative working is important in building trust across the wildfish and farmed sectors. Where there are EMPs in the priority WSPZs, work started here could be built upon and learnt from.

If sentinel cages are being used for monitoring as proposed in the document, these will need CES permission and we would welcome early discussion on this.We will want to know for example, who is responsible for them, will they be regulated by the CAR licence, how they are to be deployed, do they have a marine licence, how will they be manged whilst in the water, and confirmation that there will be no navigational issues.

Crown Estate Scotland would welcome discussion on developing the Aquaculture Database. Finfish farms operate in a shared public space and transparency is key in demonstrating compliance with statutory controls, demonstrating good stewardship, and building trust.