

Consultation on changes to SEPA charges for the marine pen fish farming sector



How to respond

The preferred way to respond to this consultation is digitally via [SEPA's consultation hub](#).

Where it is not possible to respond via SEPA's consultation hub, you can respond to this consultation by sending an email to aquaculture.regulation@sepa.org.uk

If you wish to respond another way, please [contact us using our online contact form](#) or by phone: 0300 099 6699 and we'll arrange for an Officer to call you back.

Responses must be submitted by midnight on the 18th of February. Earlier responses are welcome.

Handling your response

We would like to know if you are happy for your response to be made public. If you ask for your response not to be published, it will be regarded as confidential and treated in accordance with SEPA's published [Privacy Policy](#).

You can indicate your preference in the Respondent Information Form.

How we use your feedback

As Scotland's principal environmental regulator, our purpose is to protect and improve Scotland's environment in ways that, as far as possible, also contribute to improving health and well-being, and achieving sustainable economic growth. Our Corporate Plan 2024-2027 sets out our strategic ambition and priorities. Our Annual Operating Plans set out how we will implement our priorities every year.

In delivering these priorities we engage with those who have an interest in and/or are affected by our regulations and duties. One way we engage is through formal consultations. This is your opportunity to tell us what you think about our proposals. The feedback we receive helps us to understand what matters most to people and how we can deliver our duties efficiently and effectively.

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After the consultation closes, we'll consider the information we receive before publishing a digest of responses through the "We asked, You said, We did" section of our consultation website. This will close the consultation process by explaining how we have considered and, where appropriate, acted upon what we have heard.

The changes proposed in this consultation are subject to approval by the Scottish Ministers. Your feedback will inform the decisions made by Ministers.

1. Introduction

This consultation asks for your views on potential changes to the Environmental Regulation (Scotland) Charging Scheme 2018 (the "**charging scheme**"). SEPA's proposal is to raise additional charges from the marine pen fish farming sector in order to recover the costs associated with enhanced environmental monitoring. This monitoring will investigate the potential impact of sea lice upon salmonids for the purposes of SEPA's [sea lice regulatory framework](#). We are proposing these additional charges to deliver our obligations for full cost-recovery as required under the [Scottish Public Finance Manual](#).

The changes proposed in this consultation are subject to approval by the Scottish Ministers. Your feedback will inform the decisions made by Ministers.

2. Background

In October 2021, in their response to the recommendations of the Salmon Interactions Working Group, Scottish Ministers identified that SEPA would become the lead body with responsibility for managing the interaction between sea lice from fish farms and wild salmon and sea trout.

In December 2021, we launched its [first consultation](#) on proposals for a regulatory framework to manage sea lice losses from marine cage fish farms. We issued a [second consultation](#) in May 2023 in which we set out our detailed proposals for implementing the framework. This consultation included proposals for the development of an enhanced monitoring programme.

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In the second consultation, we identified three main objectives for the first environmental monitoring strategy under the framework which was intended to support an adaptive approach to the implementation of the framework:

- Gather data to assess the effectiveness of the combination of actions taken to protect wild salmon populations, including action to manage risks from sea lice.
- Support the development and introduction of a framework for assessing risks to sea trout, including in the Northern Isles.
- Support and complement the development and validation of refined models for the Wild Salmon Protection Zones in which screening indicates the sea lice exposure threshold may be exceeded.

All stakeholders agreed that we need to develop an enhanced environmental monitoring programme to help validate refined models and to assess the effectiveness of the regulatory framework. Almost all respondents who made comments about environmental monitoring supported a collaborative approach to developing the monitoring programme. See our [response to the second consultation](#).

It is intended that this work will contribute to the delivery of the Scottish Governments [Wild Salmon Strategy](#). We believe that it will allow us to take a big step forward in our understanding of the relationship between sea lice concentrations in the environment and wild salmonids. It will allow us to improve our understanding of the consequences of elevated levels of sea lice in the environment resulting from the operation of marine fish farms.

3. Monitoring proposals

We are proposing three programmes of work designed to deliver the sea lice regulatory framework's monitoring strategy. This section provides an overview of the proposed work. More detail is provided in the annex.

3.1 Juvenile salmonid population assessment

We use electrofishing of rivers to assess the impacts of human pressures upon fish populations and to monitor trends in population health (improvements or deterioration).

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We have a small team of fish biologists who undertake this work across Scotland. Over 2024, we allocated all our resources on sampling west coast rivers draining into Wild Salmon Protection Zones in which modelling indicates risk to wild salmon post-smolts may be relatively high.

We will maintain some of our electrofishing resources on the west coast and northern isles and will focus monitoring on those catchments where there are a range of predicted pressures.

Our charges to regulated businesses are currently insufficient to recover the cost of resourcing monitoring required under the sea lice regulatory framework. We propose to contract out electrofishing surveys to deliver the monitoring network determined by SEPA in consultation with key interest groups.

3.2 Sea trout lice monitoring

We intend to introduce a sea trout netting programme which will help us assess the impact of sea lice from fish farms on sea trout. This will replace the current programme of netting which is funded by a combination of Scottish Government, and marine fish farm operators.

We will design this national sea trout monitoring programme in consultation with key interest groups. The programme will cover the West Coast, Western Isles and the Northern Isles. We do not have the capabilities to deliver this type of monitoring, and we consequently plan to contract this work out.

3.3 Sentinel cage monitoring

We are working with fish farmers and other interested parties to develop a programme of monitoring to assess and validate the performance of sea lice dispersion models at predicting the concentrations of infective-stage sea lice in wild salmon protection zones. The monitoring involves placing small numbers of farmed salmon in sentinel pens within a wild salmon protection zone for short periods and then counting the number of sea lice that have attached to the fish. This will allow us to assess whether sea lice loads of fish in sentinel cages are consistent with concentrations of lice predicted from our sea lice models. Differences in the relative levels of sea lice found are compared with modelled concentrations of infective-stage sea lice predicted around each pen over the period of sentinel pen deployment.

We don't have the capability to deliver this type of monitoring. We consider that fish farm operators are best able to deliver it. Consequently, so long as the operators carry out the monitoring programme according to plans agreed by us (following consultation with other key interested parties) we do not intend to charge for this work. We have included an audit process in our projections (see section A4.1). We do recognise that sentinel cage monitoring will represent an increase in costs for operators.

3.3 Other resource demands

We will also need additional resources to provide for the ongoing management of the monitoring programmes and the analysis and interpretation of the data.

4. Charging proposals

4.1 Breakdown of costs

This section explains how we have calculated the costs of the monitoring requirements described in section 3. The proposed costs follow the risk-based approach of the framework, ensuring that our monitoring efforts are targeted and deliver the evidence required to support the adaptive nature of the framework. A more detailed explanation of the costings is provided in annex I. We propose to raise the funds to support the scale of work required. We are committing to delivering this overall scale of work: not necessarily all the specifics detailed in Table 1. It should be stressed that the monitoring programme will evolve as our understanding improves and this will influence our future assessment of costs.

We will use the funding raised to deliver a monitoring programme each year which will be developed in discussions with stakeholders. We consider that this additional funding will allow us to make substantial progress in collecting the information that we need to inform the application of the sea lice regulatory framework, delivering one of SEPA's obligations in the [Wild Salmon Strategy Implementation Plan 2023 to 2028](#).

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Table 1. Summary of costs

Item	Annual Cost	Detail
Juvenile population assessment	£254k	100 annual salmon sites 240 salmon sites monitored on a 1 in 3 year basis (so an additional 80 sites per year) 50 annual additional sea trout sites 150 additional sea trout sites monitored on a 1 in 3 year basis (so an additional 50 sites per year) Overall total= 280 sites per year.
Sea trout lice monitoring	£360k	40 sites annually. 20 regional sites 36 additional system-based sites on a 1 in 3 year basis (so an additional 12 per year) 8 new Northern Isles sites Fyke trap contingency
Staff costs	£134k	Coordination, planning surveys, procurement, contract management, data management, data analysis, reporting. Includes overheads.
	£89k	Site audits, data management and analysis and reporting. Includes overheads.
	£73k	Supporting coordination, procurement, contract management and reporting. Includes overheads.
Overall cost	£910k	

4.2 How do we propose to increase charges?

We are proposing increases in charges for marine pen fish farms in order to recover the cost of additional resources required for the monitoring work set out in section 3. We are proposing to recover these charges by increasing the environmental component paid by marine pen fish farms, as part of their annual charge.

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The environmental component means, in relation to each environmental category attributable to the authorised activities, the **environmental score** multiplied by the **financial factor**.

For marine pen fish farms, the relevant financial factor is “for all other discharges to water” (see paragraph 9 of the [charging scheme](#)). The current financial factor is £353, although this is subject to any increase in line with the Retail Price Index on 1 April 2025. We are not proposing to increase the financial factor as part of this consultation.

The environmental score means the score calculated in accordance with the environmental assessment scheme. We propose to increase the environmental score for marine pen fish farm operators in proportion to their current environmental score in order to recover the costs outlined in section 4.1 above (£910k). This will ensure that the increase in charges is related in some way to the scale of the relevant fish farm.

The following steps explain how we will calculate the increase in an environmental score.

1. Calculate the total environmental scores for all marine pen fish farms which are subject to an environmental component in a given financial year.
2. Calculate the additional environmental component required to recover the £910k.
3. Take the current individual marine pen fish farm operator’s environmental score as a percentage of the total environmental score.
4. Apply this percentage to the additional environmental component score that requires to be recovered.
5. Add the additional environmental score calculated to the current environmental score.

This methodology, using current data, results in an increase of approximately 32% in an operator’s environmental component.

We plan to update the [Environmental Assessment Scheme](#), which explains how environmental scores are calculated, at the same time as we update the charging scheme itself.

5. Consequences of proposed changes

We estimate the average increase per licence will be £4,100 which represents an average overall increase of 17% in the annual subsistence charges for marine cage fish farm permits.

This charge proposed increase would only apply to permits that are subject to an environmental component. Consequently, no charge applies to sites that are not under production. We can provide assessment of costs at a company level by request.

6. Wider considerations

The introduction of the sea lice regulatory framework has changed the regulatory landscape. Before its introduction, the protection of salmon and sea trout from the potential adverse impacts of sea lice from marine pen fish farms was a local authority planning issue. As part of these responsibilities, planning authorities can require operators to carry out environmental monitoring as a condition of their planning permission.

Our new monitoring regime will replace most of the obligations on fish farm operators for environmental monitoring under their planning permissions.

7. Phasing in the monitoring programme

We plan to make the changes to the charging scheme so that it can come into effect by April 2025. The scheme will aim to recover:

- £307k in 2025 and
- £910k in 2026 (plus any RPI increase)

Our focus in 2025 will be to undertaken sea trout monitoring and to build SEPA's capacity for managing the wider monitoring programme starting in 2026. Annex II provides the basis for our costs for 2025. Annex I provide the calculations for the 2026.

The bills for the 2025 additional sea lice charges will be sent out in November 2025. In subsequent years the bills will be sent out at the normal times April and September.

8. Conclusions

This proposal will fund the introduction of a national monitoring programme that will assess the interactions between sea lice and wild salmonids. Initially this programme of monitoring will trial our approach and we expect it to progressively evolve in its design over the next few years.

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Currently the industry funds work on sea lice/wild salmonid interactions via requirements imposed by planning conditions. These programmes of work are focused upon particular sites and it is not easy to gain access the resultant data.

The new monitoring programme will be designed to provide the information that Scotland needs to support SEPA's sea lice Framework and the Government's Wild Salmon Strategy. We intend to make the information that is collected publicly available.

We are confident that this proposal will fund an enhanced monitoring programme which will provide the information required in a more efficient and transparent manner.

9. Questions

Question 1. What is your name (optional)?

Question 2. What is your email address (optional)?

Question 3. If you have supplied an email address are you happy to receive communication from SEPA about the regulation of aquaculture?

Question 4. Are you responding to this consultation on behalf of yourself or an organisation?
(Yes, No)

If you answered no please provide details of the organisation or relationship to the individual you are responding on behalf of?

Question 5. Are you happy for us to publish your response to this consultation?

(Yes, No)

Question 6a. Do you agree that we have identified an appropriate scale of monitoring work to allow us to start improving our understanding of the interactions between sea lice and salmonids?

(Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

6b. Please add any comments/explanations that you wish to make about your response

6c. Do you have any suggestions to improve our estimates of the scale of monitoring work required?

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Question 7. Do you agree with our proposal to recover our costs by increasing the environmental component where that is paid for by a marine cage fish farm permit?

(Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

7b. Please add any comments/explanations that you wish to make about your response

Question 8. Do you agree with our proposal to recover the additional charge in proportion to the scale of the existing environmental component for each permit?

(Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

8b. Please add any comments/explanations that you wish to make about your response

Question 9. Do you agree with our proposal to phase the enhanced monitoring programme over 2025 and 2026?

(Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

9b. Please add any comments/explanations that you wish to make about your response

Question 10. Do you agree that the proposals for a national monitoring programme will represent a significant improvement in the way that sea lice/wild salmonid interactions are monitored?

(Strongly agree, agree, neither agree nor disagree, disagree, strongly disagree)

10b. Please add any comments/explanations that you wish to make about your response

Question 11. Do you have any other observations that you wish to make?

Annex I. Costing of monitoring requirements

A1: Introduction

This annex explains how we have calculated the costs for the proposed charges for sea lice monitoring. It has four components:

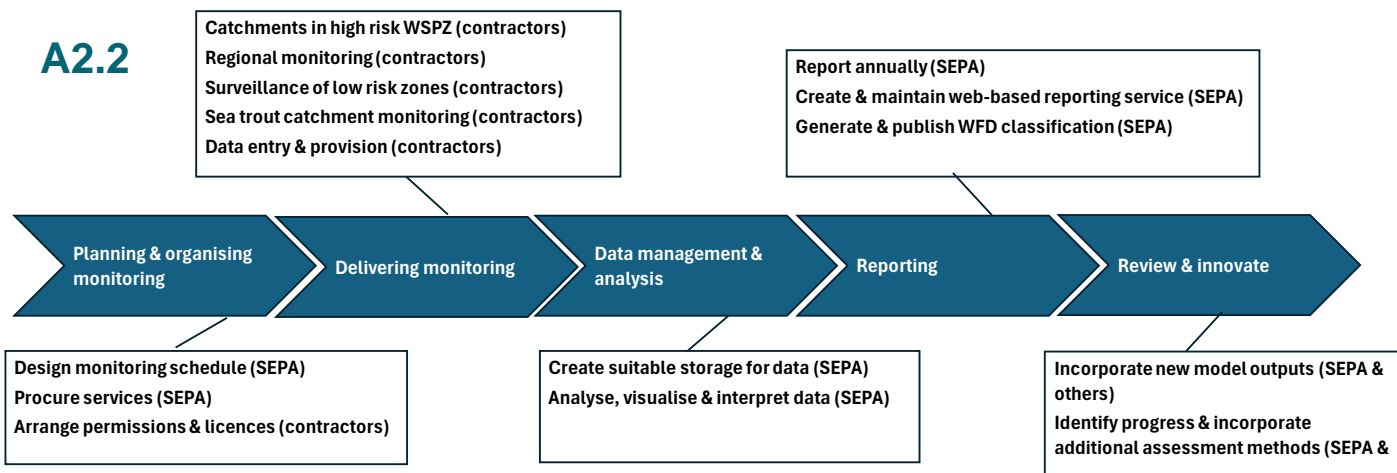
- Juvenile salmonid population assessment;
- Wild sea trout monitoring;
- Sentinel pen monitoring; and
- SEPA resource demands.

A2: Juvenile salmonid population assessment

A2.1 Requirement

Gather evidence suitable for assessing and monitoring the status of salmonid populations in aquaculture areas. This must be aligned with existing and ongoing data collected in other parts of Scotland, to provide a comparative assessment of status suitable for inclusion in the River Basin Management Planning process.

A2.2



Scope

Organising and planning surveys

Designing schedule of monitoring (SEPA)

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- To cover a 3-year period, with annual review and amendment
- Operational monitoring network to provide detail on individual catchment scale population impacts
- Regional monitoring to provide annual assessment of trends across high and low risk lice sites
- Monitoring sites included based on:
 - Existing data on stock assessment and pressures
 - Latest understanding of sea lice risk from modelling
 - Geographic coverage
 - GRTS survey design

Writing statement of requirements and procuring services (SEPA)

Arranging necessary permissions (Contractors)

- Electrofishing licencing
- Landowner permissions
- Costs to be covered through procurement of 3rd party services, **estimate £3k annually**

Delivering monitoring

All electrofishing monitoring to be carried out to common standards, following National Electrofishing Programme for Scotland protocols. This will require a mixture of single and multi-pass sites. Provision should also be made for tissue collection for potential future genetic analysis of introgression and genetic stock identification baselining.

Operational salmon monitoring

This will have to be sufficient to deliver a robust assessment of the status and trends of juvenile salmon populations in wild salmon protection zones, and to establish whether any differences are associated with high and low sea lice risk assessments.

Given the extent of the eight high risk wild salmon protection zones, and the number of salmon catchments across the west coast and western isles, we estimate that this will require at least 100 sites to be monitored annually, and 240 sites monitored on a 3-year rotating basis (i.e. 180 sites per year in total). This will maximise our understanding of spatial and temporal variability.

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Operational sea trout juvenile monitoring

In addition to the above, specific monitoring will be required to assess the status and trends of juvenile trout populations in sea trout catchments which have a higher relative risk of sea lice pressure. This will include the Northern Isles, and sections of the west coast and Western Isles where sea trout are more common, or where local lice risks are high. We estimate that this will require an additional 50 annual sites, and 150 sites on a 3-year rotating basis (i.e. 100 sites per year in total).

Other surveillance WFD fish monitoring in non-aquaculture or no risk areas is covered by existing SEPA charged resource.

Total new charging resource = 280 sites annually.

Based on an assumption of 3 sites per day on average, a daily team rate of £2400, with additional contingency of 10% for travel to the islands and remote areas, the **estimate for field monitoring is £247k**. Entry and provision of data by 3rd party contractors is estimated as £4k.

The total annual estimate for all juvenile monitoring services is c.£254k for contractors

Managing and analysing data (SEPA)

Create suitable storage for data and ensure data flows from monitoring programme.

Analyse, visualise and interpret data.

Expert advice providing by stakeholder groups especially the Scottish Government Marine Directorate.

Reporting

Annual reporting assumed to be required, with more regular updates where feasible.

Creation and maintenance of a web-based reporting service, including spatial visualisation of data via Scotland Aquaculture website.

Generate and publish WFD classification outputs.

Generate NEPS outputs.

Longer term review and innovation

Incorporate model improvements for monitoring planning (SEPA and industry).

Identify, progress and incorporate additional assessment methods (SEPA, industry, SG).

- Work in partnership with other bodies to develop index river approach to examine marine survival (tagging and trapping based studies).

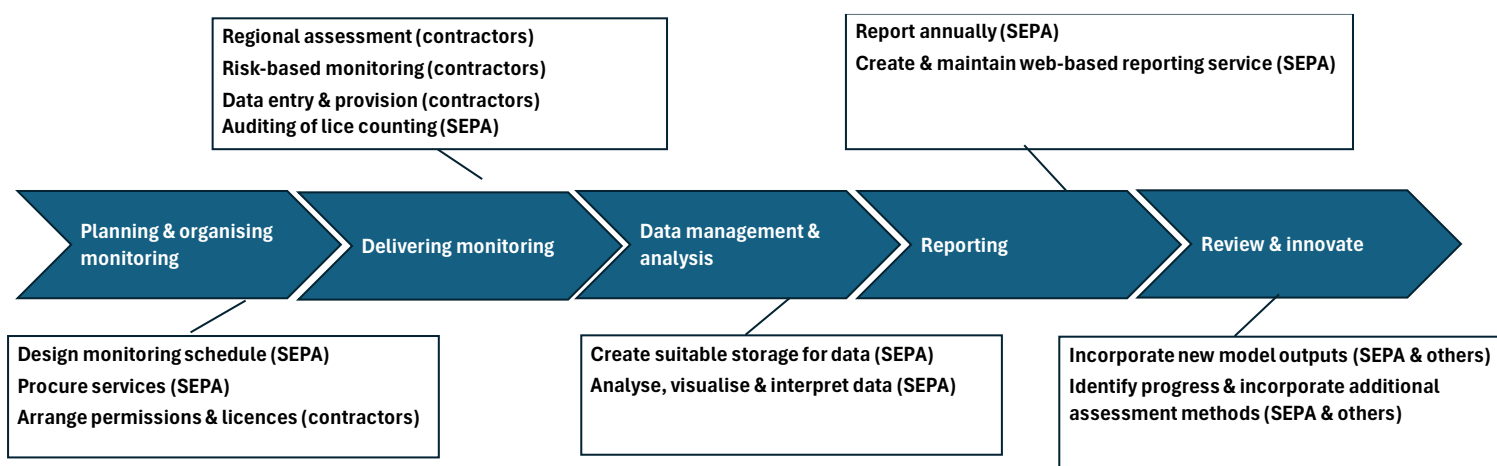
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- Analyse salmon post-smolt tracking information and identify requirements for future studies to improve assessment of salmon risk (SEPA).

A3: Sea trout monitoring

A3.1 Requirement

Collect monitoring data on levels of sea lice on wild sea trout. The data should be suitable for assessing spatial and temporal trends in lice levels, inferring level of likely impact to sea trout (i.e. presence of mobile lice stages) and increasing our understanding of any relationship with aquaculture production. It should be informed by outputs from spatially explicit predictive models of sea lice, and where possible contribute to model validation and refinement.



A3.2 Scope

Organising and planning surveys

Designing schedule of monitoring (SEPA)

- To cover a 3-year period, with annual review and amendment.
- Approach to identify large scale trends and provide additional local scale information on high-risk systems.
- Monitoring sites included based on:
 - Existing data to maintain time series and to use existing knowledge of feasible sampling sites.
 - Latest understanding of sea lice risk from modelling.

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- Geographic coverage.
- Writing statement of requirements and procuring services (SEPA)
- Arranging necessary permissions (Contractors):
 - Marine Directorate licensing (where close to river mouths).
 - Landowner permissions.
 - Crown Estate (for Fyke traps).
 - Maritime and Coastal Agency (fyke traps).
 - NatureScot (SAC areas).

Costs to be covered through procurement of 3rd party services, estimate £9k over 3 years, c £3k annually

Delivering monitoring

Large scale relative trends will initially be assessed using seine netting sites from the existing network, with evolution of sites following availability of hindcast model.

Current monitoring effort- since 2010, annual average is **20 sites** (ranges from 13-32).

New sites will also be required in the Northern Isles as a priority. Propose **8 sites annually**.

A catchment or individual system level approach will require additional monitoring above current levels to assess levels of variability and representativeness of specific sites. These sites will be chosen on the basis of predicted lice abundance from spatial model outputs, when hindcast models are available (2025). Best current estimate is 6 sites per system on average, spread across the 6 highest risk systems. Propose monitoring these on a 1-in-3 year cycle, requiring **12 sites per year**.

The most up to date SFCC/ FMS monitoring procedures for seine netting and fyke trapping should be followed to ensure data quality. Provision should also be made to include tissue sampling for potential future genetic stock identification of sea trout individuals.

Total estimate =40 sites per year.

Cost per site estimated at £6k.

10% contingency added for travel to islands and remote areas

Total cost for seine netting field monitoring estimated as £264k

Entry and provision of data by 3rd party contractors, estimate £3k

Fyke trapping can provide better long term (3-4 week long) data at a site and should be considered as a potential method for assessing levels of temporal variability. It may also be the only way to monitor some sites. It is much more expensive- c.£1k per day, and capital costs are £5k.

To ensure this is available as an option in the overall proposal costings, propose an **additional £90k contingency**.

Total annual estimate for all sea trout sea lice monitoring services is estimated as c.£360k for contractors

Auditing of a selection of sites required, to be delivered by SEPA

- Details and extent to be agreed but expected to be covered in part by existing fish ecology and EPO resource.
- Appropriate expertise available in SEPA fish ecology team, plus additional training to be delivered by IMR through funded SLIPD project.

Managing and analysing data (SEPA)

Create suitable storage for data and ensure data flows from monitoring programme.

Analyse, visualise and interpret data.

Expert advice provided by stakeholder groups, especially SG Marine Directorate.

Reporting (SEPA)

Annual reporting assumed to be required.

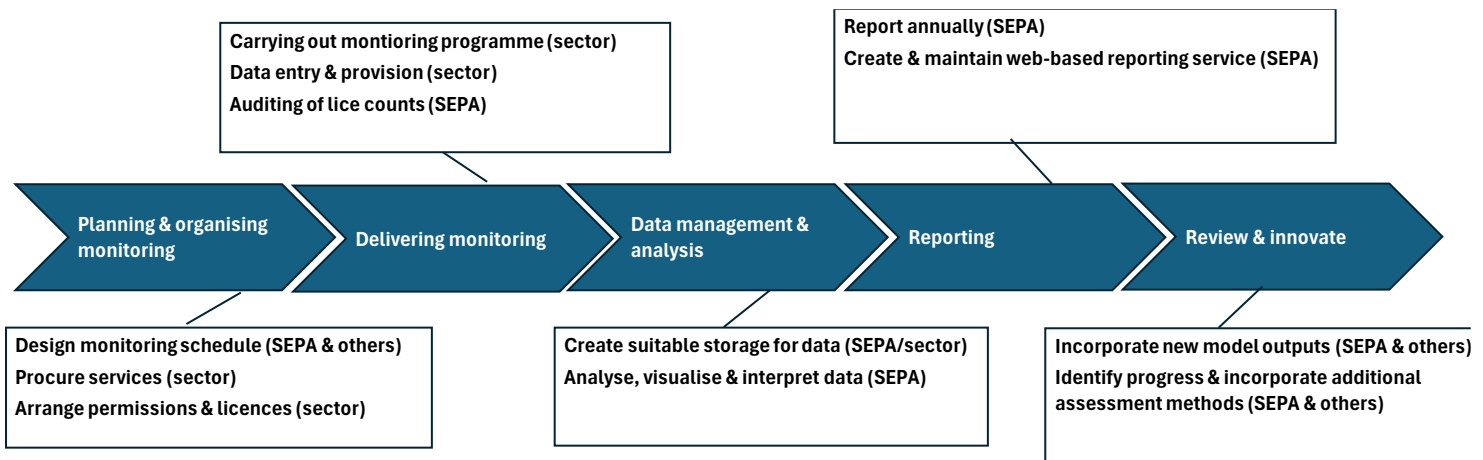
Creation and maintenance of a web-based reporting service, including spatial visualisation of data via Scotland Aquaculture website.

A4 Sentinel pen monitoring

A4.1 Requirement

The sentinel pen monitoring programme needs to provide data suitable for validating and testing the skill of the spatial sea lice risk models.

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A4.2 Scope

Organising and planning surveys

Sector to produce suitable monitoring plan, including pilot studies where necessary to confirm suitability of method for validating and testing Scottish lice risk models (Sector).

SEPA (via governance group) to assess and agree methodology.

Delivering monitoring

Annual sentinel pen surveys to be carried out across a sufficient range of sites to provide model validation. Scope of programme to be designed by Sector and agreed with SEPA via governance group. (Sector led, SEPA input required at planning stage)

Initial management and entry of data, and subsequent delivery to SEPA to be delivered by sector.

Auditing of a selection of sites required, to be delivered by SEPA.

- Details and extent to be agreed but expected to be covered in part by existing fish ecology and EPO resource.
- Appropriate expertise available in SEPA fish ecology team, plus additional training to be delivered by IMR through existing SEPA-funded SLIPD project.

Managing and analysing data

Create suitable storage for data and ensure data flows from monitoring programme (SEPA).

Comparison, testing and validation into SEPA risk models to be carried out by SEPA staff, in collaboration with input from modelling and monitoring governance groups.

Reporting

Annual reporting assumed to be required (Led by SEPA, with industry support).

Creation and maintenance of a web-based reporting service, including spatial visualisation of data via Scotland Aquaculture website (SEPA).

Review and innovate

Identify, progress and incorporate additional and alternative methods for assessing lice levels in the environment (SEPA, industry, SG).

Work in partnership with other bodies and academic institutions to assess new ways of validating and incorporating data into Scottish risk models (SEPA, industry, SG).

A5. New SEPA staff resource required

Almost all SEPA allocated tasks in the 3 monitoring strands are new and are not covered by existing charges. The exceptions are generating and reporting WFD assessments, surveillance monitoring in non-aquaculture areas, specific modelling development work and part of the auditing role.

These new tasks are significant and cannot be absorbed within current staff resources. They will require new posts to be created which will reflect the range of technical complexity required.

Annex II. Phasing-in our monitoring plan

This annex describes how we have calculated the cost of monitoring that we will carry out in 2025. Staff costs also cover the work required to prepare the 2026 monitoring programme.

Table 1. Summary of costs for 2025

Item	Annual Cost	Detail
Sea trout lice monitoring	£84k	12 sites to be sampled for 2025. Ten of these to be drawn from the network of sites previously funded by Scottish Government, prioritising those with a long time series and proven suitability for effective sampling, plus 2 new sites in Orkney.
Staff costs	£134k	Coordination, planning surveys, procurement, contract management, data management, data analysis, reporting. Includes overheads.
	£89k	Data management, analysis and reporting, technical support for survey planning, site audits. Includes overheads.
Overall cost	£307k	

Organising and planning surveys

We have calculated the costs of the sea trout monitoring using the following assumptions.

Monitoring sites included based on:

- Maintain time series of existing data points and using knowledge of feasible sampling sites.
- New sites in Orkney located on the basis of best available knowledge of sea trout producing rivers and coastal habitat use.
- Latest understanding of sea lice risk from modelling.
- Maximising geographic coverage in combination with separate EMP plans.
- Writing statement of requirements and procuring services (SEPA)

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- Arranging necessary permissions (Contractors):
 - Marine Directorate licensing (where close to river mouths).
 - Landowner permissions.
 - Crown Estate (for Fyke traps).
 - Maritime and Coastal Agency (fyke traps).
 - NatureScot (SAC areas).

Costs to be covered through procurement of 3rd party services, estimate £2.4k for 2025

Delivering monitoring

The existing network of sea trout lice monitoring sites will be used to identify 10 sites that have consistently been sampled effectively in the past and have a long time-series of data which has proven useful for previously published studies. These will be sites which would not otherwise be covered under existing EMPs, and which have been sampled using Scottish Government funding in previous years.

In addition, 2 sites will be included in Orkney to begin collecting baseline evidence in this region.

The most up to date SFCC monitoring procedures should be followed to ensure data quality. Provision should also be made to include tissue sampling for potential future genetic stock identification of sea trout individuals.

Total estimate =12 sites.

Cost per site estimated at £6k.

10% contingency added for travel to islands and remote areas

Data entry and management prior to provision to SEPA estimated at £2.4k for 2025.

Total cost for seine netting estimated as £84k

Auditing of a selection of sites required, to be delivered by SEPA

- Details and extent to be agreed but expected to be covered in part by existing fish ecology and EPO resource.
- Appropriate expertise available in SEPA fish ecology team, plus additional training to be delivered by IMR through funded SLIPD project.

Total sea trout monitoring delivery cost for 2025 estimated as c.£84k

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