



Inverlussa Marine Services is one of Scotland's leading workboat operators, with a fleet of modern vessels contracted to a number of Scotland's fish farm operators around the Scottish Mainland, Orkney and Shetland.

Having read SEPA's consultation on the proposed Sea Lice Risk Framework we wish to state that, despite our place as an integral player in lice control in Scottish Salmon farming, we do not support the proposed framework.

The proposal contains a number of uncertainties in its current form in terms of how it will be implemented and what knock-on effects it might have on the industry. As a small business located in the Inner Hebrides which has been built around supporting salmon farming and now has a fleet of 17 vessels and 100 staff, how can we confidently invest in our business model and create more job opportunities when this framework will increase uncertainty within the industry?

Sea lice are one of a wide range of pressures on wild salmon, as can be seen from the fact that stocks of wild salmon are decreasing across not only Scotland, but across the whole Atlantic Ocean. Any Risk Assessment must consider all possible pressures and their impact on the survival of wild salmon.

Consideration must also be given to the welfare of farmed salmon under the proposed framework. Reducing lice levels to those which are suggested will require routine lice treatments. Although there are a variety of methods available to salmon farmers to treat lice burdens, all of them come with small but significant costs to the stock. All treatments carry an inherent stress to the farm stock and as such they should not be used as a routine preventative measure.

SEPA are legally required to consider the social and economic impacts of any new regulatory framework but there is no impact assessment included with the consultation documentation. There is concern from the salmon farming sector that introduction of the framework will result in a moratorium on salmon farm development on the West coast of Scotland and the Western Isles. This will not only stall improvements in efficiency and sustainability at a farm level, but also in the wider community. Inverlussa have recently taken delivery of the first hybrid vessel in the Scottish Aquaculture sector, and have plans to continue bringing new and innovative technology to the industry. Without the confidence of growth in the Aquaculture sector, companies like Inverlussa will be unable to follow this strategy.

On average every active salmon farm in Scotland provides jobs for 8 people on farm and a further 5 support staff. Additionally, there are in excess of 3600 supply chain businesses operating across Scotland supporting further jobs related to the Aquaculture industry.

A new regulatory process for finfish farming in Scotland has recently been recommended by Professor Griggs and has been supported in principle by the Cabinet Secretary, due to the fragmented nature of regulation at the moment. Before any new frameworks are brought in, improvements to the current process must be made.

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