

From: [REDACTED] <[REDACTED]>
Sent: 31 January 2022 17:23
To: [REDACTED];
aquaculture.regulation
Cc: [REDACTED]
Subject: RE: 1-to-1 Sessions for consultation on the proposals for a risk-based framework for managing interaction between sea lice from marine finfish farm developments and wild Atlantic salmon in Scot

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Att: Aquaculture Sector Team

Thank you for the undernoted invitation to discuss the *Proposals for a risk-based framework for managing interaction between sea lice from marine finfish farm developments and wild Atlantic salmon in Scotland* in advance of the formal consultation.

[REDACTED] British Trout Association, has attended your previous meetings regarding this proposal on behalf of the trout sector and has kept us informed during the process. Unfortunately we are unable to attend the 1-1 meetings proposed below but would like to take the opportunity to put forward our major concerns/queries with regard to the proposal.

- Confirmation that this would not apply to existing sites, only to development of new fin-fish sites.
- Consideration of the resource required to undertake the necessary modelling. This highly specialised field would place considerable resource and financial burdens on the smaller operators that are typical within the trout sector, such as Kames Fish Farming Limited. This cost would be disproportionate against production levels when compared to the salmon sector.
- How has the science been validated and has there been a trial period to ground truth modelled predictions against what is actually happening in the marine environment? Given the potentially serious negative impact of unreliable modelling on business, jobs and local communities, we think it important that the proposed framework is properly and fully validated.

Kames Fish Farming Limited are striving to continue to steadily expand production, it is necessary to maintain a critical mass to comply with the industry's ever increasing regulation. We are therefore extremely concerned that this will add a potentially punitive cost to us which may stunt such business growth and also has potential to result in trout operators inability to comply with regulation. Further, although trout and salmon are similar species, there are some distinct differences, including a lesser degree of susceptibility to lice burden and we ask that this is recognised.

We understand that you are meeting with the BTA our industry body and trout sector colleagues on Friday 25th February and we look forward to joining these discussions.

Kind regards



Kames Fish Farming Limited

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