

## **RIVER CREE DISTRICT SALMON FISHERY BOARD**

### **RESPONSE TO SEPA CONSULTATION ON SEA LICE 2021**

These are the responses of the Board to the various questions asked.

**Q. Are there other types of information that you think could usefully inform the adaptive development of the proposed framework? If so, please outline how this information could be used?**

**A. In Section 5 there are detailed provisions for screening development proposals (though it is not clear to us what your screening models are). By contrast, the way permits for existing farms would be altered, mentioned in Section 6, seem vague in the extreme. We were appalled by the opening sentence of 6.4**

**“Once the framework is established, we will work over the longer term to identify any wild salmon protection zones where the densities of infective-stage lice resulting from the operation of existing farms is posing a hazard to wild salmon populations.”**

**This Board is of the view that the work of identifying zones where the densities of infective-stage sea lice from existing farms pose a hazard to wild salmon populations is an urgent priority and should not await the establishment of the framework, let alone be left to be worked on “in the longer term”. Information about sea lice densities emanating from existing farms should form part of the adaptive development and should be acted on urgently.**

**Q. Which groups and organisations do you think we should include on technical advisory groups to assist us with the development of the detailed working arrangements and methods needed to implement the framework?**

**A. We have no suggestions to make.**

**Q. 1. The purpose of the proposed framework is to help us ensure Scotland’s environment is protected and improving. It is important for everyone that, as far as possible, this purpose is delivered in ways that also contribute to improving people’s health and wellbeing and to achieving sustainable economic growth.**

**2. Do you think the design of the proposed framework, or how it is implemented, could affect your community or business interests either positively or negatively? Please tell us what you think the effects could be and why?**

**3. Do you have suggestions about how any potential negative effects could be reduced or avoided, or potential positive effects delivered or enhanced, without compromising the environmental protection purpose of the proposed framework?**

**A. 1. This paragraph of this “question” is not a question but a purported statement of facts, with which we must take issue. There is no explanation of the phrase “sustainable economic growth”. The Board considers it is important that the framework is delivered in ways that contribute to the sustainable economic growth of salmon fisheries within the Cree District, but question whether this is consistent with the economic growth of fish farms on the west coast of Scotland. We also question how the framework can be delivered in ways that contribute to**

people's health and wellbeing. Antimicrobial resistance is regarded by health authorities as one of the biggest global threats to public health, but the increasing use of antibiotics at various Scottish fish farms, as revealed by a spreadsheet published by SEPA in February 2022, can only increase the risk of such resistance. The framework has nothing to say about such threats to public health caused by fish farms and it is fanciful to imagine that the framework can contribute to health and wellbeing without considering such threats and how to combat them.

2. The Board considers that both the design of the proposed framework and the way it is proposed to be implemented will negatively affect salmon fisheries in the Cree District and in turn the communities in the District. As previously mentioned, we regard the environmental damage caused by existing fish farms as a problem requiring urgent action. The framework does not address this problem. Moreover, the timescale for possible implementation of extending the framework to existing fish farms is vague and fails to address the urgency of the problem.

3. We suggest that existing fish farms should be included in the framework and also that wild salmon protection zones should be expanded, as further mentioned in our answer to the next question.

**Q. Do you think that there are important areas for wild salmon post-smolt migration that we have not identified as wild salmon protection zones? If so, please explain why these areas should be identified as protection zones and the evidence on which your suggestions are based.**

Do you think that any of the areas we are proposing as wild salmon protection zones should not be so identified? If so, please explain why you think these areas are not important for wild salmon post-smolt migration and the evidence on which your view is based.

A. It is well established that at the free-living planktonic stages of development sea lice can be carried many miles by tides and currents from their original source. The proposed protection zones should accordingly be expanded considerably to include such areas.

**Q. Do you have any scientific evidence that should be considered to ensure the sea lice exposure threshold is effective in protecting wild salmon populations? This includes any evidence for a refinement of the threshold.**

If so, please can you provide that evidence?

A. We have no such scientific evidence.

**Q. Do you have relevant expertise that you would be happy to share with us during implementation planning to help us develop modelling protocols? If so, please tell us about your area of expertise?**

If you happy for us to contact you about this, please advise how we should do so.

A. We have no such expertise.

**Q. Do you have any suggestions for how SEPA could most efficiently and effectively assess compliance? If so, please could you outline these?**

A. We are of the opinion that the only effective way of assessing compliance will be for unannounced visits by SEPA personnel to monitor sea lice concentrations

at individual farms. Allowing fish farms to “mark their own homework” would not, we feel, be effective.

**Q. Do you have any suggestions on how we should develop a monitoring plan to assess the effectiveness of the framework? If so, please could you outline these? Do you think there are components that should be included in an effectiveness monitoring programme that you could help deliver? If so, please let us know what these components are?**

**If you happy for us to contact you about this, please advise how we should do so? Do you have any additional feedback on any of the proposals outlined in this proposed framework?**

**A. We have no suggestions to make.**

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██████████, River Cree District Salmon Fishery Board

**Dated: 10<sup>th</sup> March 2022**