

March 14th 2022.

## **Consultation response.**

*Proposals for a risked-based framework for managing interaction between sea lice from marine finfish farm developments and wild Atlantic Salmon in Scotland.*

Response from The SGA Fishing Group.

The SGA Fishing Group represents river ghillies and river workers and is a stand-alone fishing arm which sits within The Scottish Gamekeepers Association.

The Group wishes to make the following comments on SEPA's proposals.

1/ While the SGA Fishing Group is supportive of protections for migrating wild salmon against sea lice from fish farms, this framework proposal carries no guarantees that (even when implemented, and this may take considerable time) wild salmon will be protected.

The reasons are as follows: We believe that the way to guarantee this (protection for migrating wild salmon) is to ensure there are no new fish farms in known migratory salmon routes.

Additionally, we believe that existing fish farms must be monitored and assessed as to their role in increasing the likelihood of lice burdens on wild salmon which may either cause disease or mortality. If an existing site is found to be in breach of the threshold, the site should be moved to a more appropriate location, away from migrating fish.

These conditions are more in line with the findings of the two Parliamentary reviews on Aquaculture, undertaken in 2018, which promised much more effective regulation of fish farming than has subsequently transpired.

The new proposal applies only to new applications and applications where there is a desire to increase capacity. While this is welcome, as a start, the refusal to look at existing sites (and potential damage they are causing) means it *cannot be possible* to safeguard migrating wild salmon when less than three quarters of fish farm sites (which have the potential to imperil the life chances of wild salmon) will be subject to assessment. This is a singularly low ambition when Scottish Government has a duty to protect wild Atlantic Salmon populations, which have declined by 70% in only two decades.

Given the 12 high level pressures on salmon stocks (aquaculture being one) this can only be read as Scottish Government placing the expansion of the aquaculture industry, in priority terms, over the protection of the salmon.

2/ Timescales: Since the aforementioned Parliamentary inquiries, it has taken SEPA a considerable amount of time to implement its framework governing medicines and discharges into the wider marine environment from fish farming; issues which are arguably easier to identify.

We don't believe the timeframe for adding sea lice to that framework (likely to take many more years) reflects the urgency of the problem and the consequences for wild salmon. Even the protection zones are something to be 'worked towards'.

Similarly, when it comes to enforcement: ie: if a site is found to breach accepted thresholds regarding sea lice, the proposal suggests that SEPA will then 'work with the operators to enable them to identify how best to achieve the reduction'. This will not inspire those who have legitimate concerns regarding the damage sea lice can cause to wild fish.

Given that biological challenges are one of the key determinants of the size of a fish farm operator's annual profits, does SEPA not presume the operator would have looked into the issue before then?

This measure is hesitant at best and follows the ultra light touch approach espoused in Professor Griggs' recent review. If a fish farm is consistently failing to make the reductions required to keep an iconic species safe, is it not in breach of a contract of trust and, therefore, should be liable to make some form of recompense?

The operator needs to be subjected to appropriate measures forcing it to take its biosecurity more seriously or, if the problem is due to the site, then change is required. This, too, is adaptive management, as the proposal discusses. The operators are already being given considerable privileges of self-reporting. SEPA needs to be able to monitor and regulate so as to be effective in ensuring wild salmon are protected.

The Griggs Review (which this will presumably now dovetail with) was set up to look at ways to regulate fish farming more effectively- in line with public concern- but, despite frequent nods to stronger measures such as the imposition of fines, the issue has once again been side-stepped.

Other countries with a longer history of aquaculture development have begun to take stronger steps to protect the marine environment and wild fish. These steps are not regarded as draconian but rather appropriate, given the extent to which operators have potential to do harm.

This framework proposal points to the beginning of the right direction but does not achieve what it will take to make a difference in reducing the well researched consequences of sea lice infestation on wild fish.

The SGA Fishing Group  
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