

SEPA Consultation on proposals for a risk-based framework for managing interaction between sea lice from marine finfish farm developments and wild Atlantic salmon in Scotland

Deadline: 14th March 2022

Summary response

Simply Blue Group (SBG) is a blue economy project developer working with the oceans to help address climate change. To do this is its currently developing floating wind farms, wave energy sites and inshore low impact salmon farming in its JV, Loch Long Salmon that uses semi-closed farming systems that capture the waste and exclude the sea lice.

SBG is also considering the viability of offshore salmon farming, potentially within floating wind farms, which would be at distances far outside of the proposed wild salmon protection zones. Through engagement with a broad range of stakeholders, including with multiple teams at SEPA, SBG understand that offshore farms, given their location, will pose a reduced risk of sea lice transmission in terms of interactions with wild salmon.

The Scottish Parliament Rural Economy and Connectivity Committee (REC) outlined a suite of recommendations in their 2018 report on salmon farming in Scotland¹. Recommendation number 54 acknowledges the challenges of moving to more exposed sites but notes the benefits brought in terms of addressing fish health issues (i.e. sea lice transmission) and reduction of environmental impact of waste.

Similarly, as stated in their 10 Year Farmed Fish Health Framework, also of 2018, Marine Scotland encourages a departure from conventional medicinal sea lice treatment to a 'balanced combination strategy' of medicinal, physical and cleaner fish approaches.² Much like the physical barrier solution provided by the semi-closed system, offshore siting adheres to this balanced combination strategy by placing a physical barrier in the form of distance between the farm and the wild salmon, thus reducing or eliminating the risk of sea lice transmission.

While offshore sites fall out-with the areas under consultation, SBG is nonetheless keen to operate in alignment with SEPA's goal of minimising the risk to wild salmon populations of sea lice transmission and looks forward to future dialogue on this issue.

¹ Scottish Parliament, Rural Economy and Connectivity Committee, *Salmon farming in Scotland*, 2018, [Link](#)

² Marine Scotland, *10-year Farmed Fish Health Framework*, 2018, [Link](#)