

PE1598/I

## Scottish Salmon Producers Organisation Letter of 16 August 2016

SSPO welcomes the opportunity to provide information that outlines our members' approach to managing their operations. We also welcome the opportunity to clarify a number of misconceptions presented by the Petitioners.

### Background

The Scottish salmon industry produces 170,000 tonnes of salmon per year and is Scotland's largest food export. The industry is confined, by planning policy, to operating solely on the West coast and Northern and Western Isles. No new farms are permitted on the East & North coasts of Scotland. Roughly 90% of wild salmon catches are on the East/North coast and 10% in the West.

### Management of fish farming

Day to day management of sea lice is one of the most important tasks performed on salmon farms. Farmers and their vets have legal and ethical responsibilities to look after the health and welfare of their fish, including maintaining lice numbers at low levels. Sea lice management on farms closely parallels the management of parasites in sheep, cattle, poultry and other food producing animals.

The Code of Good Practice for Scottish Finfish Aquaculture (COGP) comprehensively describes the processes and procedures followed by fish farmers and their vets in managing lice. An entire section of the COGP is devoted to providing detailed guidance on good practice in lice management, yet a major part of the Salmon & Trout Association (S&TA) case focuses on misrepresenting one element of this. Specifically, the petition alleges that sea lice numbers on fish farms have repeatedly risen above 'thresholds' referred to in the COGP. This allegation has been repeated many times by S&TA over the past few years and this deliberately misrepresents what are, in fact, **suggested treatment criteria** first developed in the days of immersion (or bath) treatments with anti-lice medicines. **Suggested treatment criteria** are not inflexible cut off points which imply that exceedance is in some way detrimental to the health of farmed or wild fish. Rather, they represent reference points for farms to consider what forms of intervention are appropriate for the site specific situation. What there can be no doubt upon is the fact that industry has set itself a very high bar for triggering its management response to sea lice in farms.

Salmon farmers then have a wide range of measures that can be deployed, both through direct intervention on farms and through collaboration between different sites operating in the same Farm Management Area (FMA). Direct intervention options include use of a range of licensed veterinary medicines specifically consented for the treatment of lice on farmed salmon; deploying 'cleaner fish', especially wrasse and lumpfish, to remove lice; using tarpaulin 'skirts' to reduce the likelihood of lice entering farms; using feed ingredients that improve resistance to lice; and using mechanical removal techniques to physically displace and capture lice via filtration systems on board specialist vessels. Additional innovative techniques are being developed all the time to add to this suite of options. In addition to direct intervention, farms collaborate with each other in Farm Management Areas by only growing single generations of fish to avoid the transfer of lice onto newly placed fish; fallowing sites and whole farming areas between crops of fish, also to prevent the transfer

of lice; and collaborate by synchronising lice management activities within whole FMAs, such as treating fish, use of cleaner fish and sharing resources, such as workboats and specialist staff.

COGP also lays out the method of systematically counting the various stages of lice present on a representative sample of fish, recorded on a weekly basis and shared at company, FMA, regional and national level. These data are then placed within the national database that is managed by SSPO and form the basis of the quarterly reporting system that is shared with Marine Scotland and simultaneously openly published. (Separate submission of example Report to Committee Secretariat)

### **Specific issues within Petition PE1598**

The petition focuses on what S&TA argue is less than adequate transparency in site specific sea lice information. An extensive debate on this subject took place during consideration of the 2013 Aquaculture & Fisheries Bill, prior to which, SSPO undertook to enhance the public reporting of lice information already in place. For the past three years SSPO, on behalf of its members, has published comprehensive information on sea lice over 30 regions that co-relate to equivalent areas based on wild fish catch records extending back over fifty years. The purpose of publication is to provide detailed information on lice and on the enormous practical effort and resource devoted to dealing with lice on farms, while at the same time allowing wild fish interests to provide parallel information on wild salmon and sea trout across these regions. This should have allowed any indication of a relationship between lice on farms and the wellbeing of wild salmon and sea trout that may exist to be identified and highlighted. Disappointingly, and despite repeated and ongoing invitations to wild fish interests (District Fishery Boards, Fisheries Trusts, proprietors, etc.) to provide parallel information that could helpfully inform the debate, no information whatsoever has been forthcoming from wild fish interests. (See Annex A attached – Example Illustration)

In contrast to the S&TA's message that fish farm management is somehow lacking, minimising numbers of lice, particularly adult and egg bearing females, is one of the most important practices adhered to within the industry. In line with other food animal production industry, prevention is better than cure, and maximum effort is directed at keeping numbers of lice as low as possible at all times.

The petitioners wish to see salmon farming carried out in land based units. Industry is constantly evolving and improving its operating environment and new technologies are being explored to develop the best farming infrastructure. Whilst we are committing large investments in the freshwater hatchery phase of the salmon lifecycle in land based facilities, we do not believe that the marine on-growing phase is viable if brought on land. Principle among our reasons for this view are the impact on fish welfare (high stocking densities), product quality parameters, physical/carbon footprint, lack of equivalent/sufficient coastal sites and deterioration of current premium image for an iconic Scottish food product. In addition, recent studies have confirmed that land based trials have yet to demonstrate improved output to match that of the marine environment. (See Annex B attached – Kuterra Review North American Aquaculture).

PEO1598 is the latest in a series of representations made by S&TA alleging that Scottish Government has failed to implement sufficient regulatory measures against Scottish salmon farmers for 'failing to sufficiently control lice on salmon farms'. There is little new information

or evidence supporting this petition over other representations made by S&TA to RACCE, the Petitions Committee and the European Commission.

Over and above COGP, Scottish Government agencies have extensive powers to inspect, monitor and review salmon farm activities. SSPO hold an open dialogue with all regulatory bodies and are not resistant to continuously improving the overall regulatory regime for the benefit of industry, legitimate stakeholders and the wider communities within which we operate. To this end we are currently engaged with Marine Scotland in improving our performance reporting criteria in regard to farm operations and in an Independent Review of Planning & Consenting for Aquaculture.

