SEPA Position Statement to support the implementation of the Water Environment (Controlled Activities) (Scotland) Regulations 2011:

WAT-PS-17-02: Guidance on determining CAR applications to use or change authorised quantities of the in-feed medicine Slice (active ingredient emamectin benzoate)

THIS DOCUMENT OUTLINES SEPA'S POSITION ON MARINE CAGE FISH FARMING ACTIVITIES AND PROVIDES A BASIS FOR INTERPRETING SEPA'S OBJECTIVES UNDER THE CONTROLLED ACTIVITY REGULATIONS (CAR).

Date	May 2017	Version	1.0

1 PURPOSE

The purpose of this position statement is to provide interim guidance to staff on the approach to be taken for the determination of Marine Cage Fish Farm applications which include a proposal to use the in-feed medicines Slice or Quinafish, active ingredient emamectin benzoate.

The final report on the Review of the Environmental Quality Standard for emamectin benzoate, Report Reference: UC12191.01, undertaken by Water Research Centre, has now been received by SEPA. This position statement applies in the period while the peer review process for the report is being carried out and until SEPA has made its decision on whether a revised standard is to be adopted.

SEPA currently has and will receive applications for the use of Slice or Quinafish that require to be determined. This guidance covers such applications and aims to provide for consistent decision making.

2 REGULATORY GUIDANCE

SEPA has commissioned a review of the Environmental Quality Standard (EQS) for emamectin benzoate, the active ingredient in the in-feed medicines Slice and Quinafish that are authorised for discharge from the majority of active marine cage fish farms in Scotland.

The final review report has now been received by SEPA and proposes that the EQS for emamectin benzoate residues in sediments should be tightened considerably, to the extent that practically useable quantities are unlikely to be able to be authorised, unless effective mitigation measures are put in place to collect fish faeces and ensure the metabolites from the administration of the medicated feed are contained.

SEPA does not have the analytical capability to detect the presence of residues from the use of these medicines in seabed samples at levels that would be necessary in order to determine whether or not the EQS proposed in the Review report is met in the seabed. It is also our understanding that there is no independent laboratory in Scotland that is capable of undertaking such analysis and detect the levels required. However, SEPA is developing its analytical method to enable these lower levels to be detected and is aware that at least one independent laboratory is also developing such a method, in conjunction with the manufacturer of Slice. We would anticipate that it will be feasible to analyse sediment samples to the required levels before sampling would be required following any use of Slice or Quinafish that is subject to conditions derived using the EQS proposed in the Review report.

The following approach should be taken when determining applications for the use of Slice or Quinafish:

- **For new sites and sites with no previous authorisation to use Slice or Quinafish** – the modelled data provided by the applicant will be run using the EQS values proposed in the Review report and where it is determined that there are no other reasons why SEPA should not be authorising the discharge resulting from the use of these medicines, the Maximum Treatment Quantity (MTQ) and Total Allowable Quantity (TAQ) will be authorised according to the output of the model.

- **For variations to increase the authorised quantity of Slice or Quinafish in existing licences** the part of the application relating to the use of these medicines will be refused. No increase in the currently authorised MTQ or TAQ will be granted.

- **For variations to decrease the authorised quantity of Slice or Quinafish in existing licences**, the variation should be granted subject to the reduced quantities.

If the variation involves a relocation of the site, fully out with its existing footprint, this should be dealt with in the same manner as a new site.