

Annex 6 Controlled Activity Regulations (CAR) - Cage Fish Farms

SEPA Compliance Assessment

SEPA licence no.:	
Site name:	
Annual summary sheet for year:	
Completed by:	
Date:	

Environmental Limits								
ELC parameter	Typical licence condition (based on MGFF template)	Data source	No breaches	Minor breach(es) or minor environmental event(s)	Repeated minor breaches or events	Gross Breach	Significant breach(es) or significant/major environmental event(s)	Comments
Scope ELC								
Controlled activity	Sch 1 & 3.1	Inspection / environmental events	No deviation from application / deviation has been agreed.	N/A	N/A	N/A	Breach of scope condition eg found to be operating a different activity, eg not a fish farm, or not in location specified. Specific consideration should be given to location of sites where the biomass etc was set using AutoDepoMod2 (ADM2).	The site should be in the location detailed in the specific condition and the cage layout should be as detailed in referenced plan. This is more important if the site has been modelled using ADM2. Any changes from that detailed in the application should be notified to SEPA and a variation carried out if required. Only consider changes other than those relating to specific ELCs detailed below.
Species	4.1.1	Inspection / returns	Compliant	N/A	N/A	N/A	Growing a species with a different species factor to that in the licence.	Only the species specified in the licence should be grown on site. However if it is found that a species not named in the licence, but which has same species factor, is being grown then this should generally not be considered a breach of scope, as it should not affect the environmental assessment, but an admin variation of the licence may be required.
Numeric ELC with single threshold values								
Maximum weight of stock / stocking density	3.2.1	Inspection / returns	Compliant	Any breach upto and including 10% of the biomass limit / stocking density	Four or more months exceeding the biomass limit / stocking density (in any one cage) upto and including 10%	More than 10% exceedance of the licensed biomass limit	Major (Cat 1) or significant (Cat 2) environmental event.	For stocking density consideration should be given to the stage of the growth cycle at which there was a breach. For freshwater sites an assessment of annual production will also be taken into account.
Process ELC (a)								
Fallow periods	4.5	Inspection / returns	Compliant	Any breach of the specified fallow period(s)	(Four or more minor breaches)		Continuous stocking between growth cycles with no fallow periods	The discharge should be made for a specific period of time only.
Fish farm Monitoring Protocol Specification (MPS)	5.1 & MPS	Returns	Satisfactory survey within previous 12 months	Borderline survey within previous 12 months.	N/A	Failure to monitor or produce a report which would allow the licence holder to demonstrate compliance with a process ELC	Unsatisfactory survey within previous 12 months (considered equivalent of a Category 1 or 2 environmental event)	The most recent MPS assessment Satisfactory(S)/Borderline(B)/Unsatisfactory (U), including assessment of modification of deviation from MPS which may affect assessment should be used. If no assessment has been carried out in the current yr then, unless there is evidence to the contrary it will be assumed that a previously borderline result will not be considered to be a breach in the following year and a previously unsatisfactory monitoring result will be considered to be a minor breach in the following year.
Process ELC (b)								
Discharge of dead fish	4.4	Inspection / environmental events	Compliant	Any breach of the licence condition (eg discharge of any dead fish)	Four or more minor breaches	(Failure to monitor or produce a report which would allow the licence holder to demonstrate compliance with a process ELC) N/A	Discharge of dead fish significant enough to be considered a category 1 or 2 environmental event	Dead fish should not be allowed to be discharged to the water environment, however a pragmatic approach should be taken if only 1 or 2 dead fish are found. The site specific situation and sensitivity will dictate the significance.
ELC parameter	Typical licence condition (based on MGFF template)	Data source	No breaches	Minor breach(es) or minor environmental event(s)	Repeated minor breaches or events	Gross Breach	Significant breach(es) or significant/major environmental event(s)	Comments
Process ELC (d)								
Any specified bath treatment chemicals (usage limit)	A1.5 - A1.10	Inspection / returns	Compliant	n/a	n/a	For bath treatments, any exceedance of the licenced amount.	Second gross breach, or any single breach equivalent of a Major (Cat 1) or significant (Cat 2) environmental event.	For any specified bath treatment chemical with a usage limit, or other licence conditions limiting the amount that may be administered, the licenced treatment amount should not be exceeded. Each usage limit should be assessed and reported separately. For marine sites this includes sea lice treatment chemicals, azamethiphos, cypermethrin and deltamethrin.
Full containment	A1.1	Inspection	Full separation of the fish from the sea during treatment	n/a	n/a	Gross exceedance of licence condition eg Partial separation of the fish from the sea during treatment?	Second gross breach, or any significant single breach equivalent of a Major (Cat 1) or significant (Cat 2) environmental event e.g where there is no separation of the treatment enclosure from the sea.	The treatment of the fish should be in an enclosure fully separated from the sea.
Process ELC (f)								
Any specified in-feed treatment chemicals (usage limit)	A1.5 - A1.10	Inspection / returns	Compliant	For in-feed treatments, any breach up to and including 10% of the quantity of in-feed medicine approved by SEPA for any individual treatment.	For in-feed treatments three or more minor breaches	For in-feed treatments, any breach over 10% of the quantity of in-feed medicine approved by SEPA for any individual treatment.	Second gross breach, or any single breach equivalent of a Major (Cat 1) or significant (Cat 2) environmental event.	For any specified in-feed treatment chemical with a usage limit, or other licence conditions limiting the amount that may be administered, the licenced treatment amount should not be exceeded. Each usage limit should be assessed and reported separately. For marine sites this would be emamectin benzoate.
Environmental Events (classified according to table 5)								
Environmental harm	2.5 & 4.2	Inspection / environmental events	No environmental harm	Minor (category 3) environmental event which is not caused by discharge in full compliance with licenced conditions (e.g. due to a spillage on site etc) and which is not accounted for elsewhere.	Four or more minor breaches	N/A	Major (category 1) or Significant (category 2) environmental event which is not caused by discharge in full compliance with licenced conditions and which is not accounted for elsewhere.	
Overall ELC band								

Environmental Management					
Attribute / aspect	Licence condition	Compliant	Minor non-compliance	Major non-compliance	Comments
Management					
Knowledge of licence by appropriate staff	2.1.1	Responsible Person and/or relevant staff have a good broad knowledge of the licence and/or its requirements. This may be demonstrated through written procedures and the operation of these procedures to ensure compliance with the licence.	Limited knowledge of licence by operator.	No knowledge of licence or its requirements by the operator	Awareness of licence requirements and purpose of / licence The Responsible Person or staff authorised on their behalf should have know knowledge of the licence to ensure compliancwe with its conditions. It should be assessed at a broad not overly detailed level.
Process Control: Systems and Procedures	4.2.1/4.7.1/4.8 7.1.1/ 7.2.1/ 7.3.1 A.1.2	Written procedures or instructions in place and are used effectively for the process control of critical aspects of the fish farm (including monitoring systems) Minor deviations from written procedures with no potential or actual breach of an ELC. No Env harm.	Written procedures or instructions in place for the process control of some (but not all) critical aspects of the fish farm (inc monitoring systems); and/or Minor deviations from written procedures with minor actual or potential breach of a ELC sufficient to cause minor environmental harm (cat 3 environmental event)	No written procedures or instructions in place for the process control of critical aspects of the fish farm (inc monitoring systems); and/or Significant deviations from written procedures with actual or potential significant breaches of an ELC sufficient to cause significant environmental harm (Cat 1 or 2 Environmental Event)	this includes: feeding and treatment methods; Permitted Substances Working Plan (PSWP) Vol reduction after treatments
Plant and infrastructure					
Operational condition of plant & Infrastructure	4.3.1	<u>Plant:</u> No or infrequent breakdown without unauthorised releases: flotation blocks and other equipment must be enclosed to prevent breaking away and discharged to environment	<u>Plant:</u> Frequent breakdown with no or potential unauthorised minor releases: flotation blocks and other equipment not fully enclosed with risk of, or evidence of, minor breaking away and discharged to environment. Equivalent to a category 3 environmental event.	<u>Plant:</u> Frequent breakdown of plant with minor unauthorised releases; and/or infrequent which may lead to actual or potential cat 1 or 2 environmental event: flotation blocks and other equipment not fully enclosed with evidence of major/significant breaking away and discharged to environment equivalent to a category 1 or 2 environmental event and/or repeated evidence of minor breaking away.	flotation blocks and other equipment must be enclosed to prevent breaking away and discharged to environment
Implementation of Monitoring Programs	5.2.1	Required monitoring programmes undertaken on time to the recognised or agreed standard	Required monitoring programmes undertaken but not to the frequency specified in the permit, or on time or not to a recognised standard.	Required monitoring programmes not undertaken	MPS benthic as per proceedure 5.1.1 MPS residue as per proceedure
Recording and reporting					
Record keeping and information and records available as required by licence	2.2.1/2.2.2 / 2.2.3/ 6.1 / 6.2 / A1.3/ A1.4/ A1.5	All records and data kept and/or collected as stipulated and available for last five years. Licence freely available to view.	Most data collected and recorded as stipulated. A small proportion of records missing and unavailable. Licence difficult to obtain.	Failure to collect and record a significant proportion of data. All or a significant number of records are missing and or unavailable.	Records should be kept as detailed in the licence. General for 5 yrs includes licence availability and the keeping of waste notes and treatments as the individual condition requires
Reports to SEPA required under licence	6.1/ 6.3/ A1.3/ A1.4/ A1.5	Reports submitted (where required) to the agreed standard and format and within agreed timescale.	All reports submitted but some are outwith timescales, incomplete or inadequate quality; or Some reports submitted but not all.	All, or majority of, reports not submitted.	SEPA generally requires records to be kept for five years. This aspect include licence availability, Quarterly returns Monitoring Protocol Submissions Notification of discharge Notification of monitoring Treatment notifications
Notification of incidents	2.4	All Incidents notified within timescales and include the required information specified	Some but not all incidents notified.	No Incidents notified; or	Applies to all licences
Overall EMC band					