

PUBLIC  
SCOTTISH ENVIRONMENT PROTECTION AGENCY

Minutes of  
SEPA Finfish Aquaculture Advisory Panel

7 September 2020  
Via Video Conference

**Attendees:**

**Coastal communities** (Coast/Coastal Communities Network); **CoSLA** (The Highland Council); **Crown Estate Scotland**; **Environmental NGOs** (Scottish Environment LINK - Marine Conservation Society, finfish buyer (Sainsburys & Aquascot); **finfish producers** (British Trout Association, MOWI, Scottish Salmon Company, Scottish Salmon Producers Organisation & Simply Blue Aquaculture) **Inshore Fisheries Group** (West Coast Regional Inshore Fisheries Group); **NatureScot**; **Scottish Environment Protection Agency (SEPA)**; **Wild fisheries** (Fisheries Management Scotland & Salmon & Trout Conservation);)

**Apologies: Marine Scotland**

<b>1.</b>	<b>Welcome and Introductions</b>	
	Apologies from Marine Scotland who had hoped to attend.	
<b>2.</b>	<b>Actions from previous meeting</b>	
	<b>Action</b>	<b>Status Update</b>
	SEPA will discuss its review of the charging scheme with the Panel at the next meeting	<b>Closed</b> Included on today's agenda
	SEPA & SSPO to further discuss / develop innovation projects	<b>Closed</b> Included on today's agenda. See below for new actions.
	SSPO to amend and re-circulate summary of innovations	<b>Closed</b> Included on today's agenda. See below for new actions.
	SEPA and SSPO to explore inclusion of impact of residue on shellfish in upcoming azamethiphos study.	<b>Open</b> Early discussion has taken place and further meetings will be scheduled. An update will be provided at a future panel meeting.
<b>3.</b>	<b>Update – Permitting pre-application process</b>	
	SEPA provided an update on implementation of the new regulatory framework and confirmed that the <a href="#">pre-application process</a> has been operating since January [ <a href="#">presentation link</a> ]	
	As part of the pre-application process, SEPA is publishing <a href="#">Screening modelling and risk identification reports</a> . These reports are intended to assist operators and inform local community engagement events. The latter are being held remotely during the Covid-19 pandemic. SEPA will take account of feedback on the reports with the aim of ensuring they are as useful as possible for both operators and other stakeholders. SEPA welcomes feedback from the panel on the report format which can be accessed via the above link.	
	<b>ACTION:</b> Regulators to provide an update at a future meeting on spatial planning work and how regulatory organisations share information to inform decision making.	

	<p>Representatives of the Coastal Communities Network questioned whether the cumulative impacts of medicine use, including the in-feed sea lice medicine, emamectin benzoate, was being adequately taken into account. Evidence of effects of emamectin benzoate use found in <a href="#">SEPA's survey</a> of marine fish farm sites in Shetland in 2017 was noted.</p> <p><b>ACTION:</b> SEPA to schedule discussion about medicine discharge assessment and control at a future meeting.</p>
<b>4.</b>	<p><b>Update – Well boat discharge regulation</b></p> <p>From Monday 9 November 2020, marine finfish farm operators must apply to SEPA for permission to discharge medicine residues from wellboats. Licences will no longer be issued for wellboat discharges by Marine Scotland.</p> <p>All licences previously issued by Marine Scotland will automatically transfer to us on Monday 30 November 2020 and be regulated under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).</p> <p>Due to the transfer, any Marine Scotland licences that require renewal between Monday 9 November 2020 and Thursday 29 April 2021 will be automatically extended until Friday 30 April 2021.</p> <p>The changes were introduced by <a href="#">The Marine Licensing (Exempted Activities) (Scottish Inshore Region) Amendment Order 2020</a>. They bring together the regulation of all discharges of medicine residues from marine finfish farms</p> <p>A representative of finfish producers asked if discharges from well boats would be permitted at locations remote from the finfish farms at which the treatment took place. SEPA referred to previous advice provided to representatives of the sector by Marine Scotland clarifying that such an approach would be inconsistent with the framework of international law to which the UK is a signatory.</p> <p>Representatives of the Coastal Communities Network asked for information about:</p> <ol style="list-style-type: none"> <li>(1) whether new medicines may be permitted for use in conjunction with cleantreat technology and, if so, what precautions will be put in place to prevent their inadvertent release into the environment; and</li> <li>(2) when SEPA is planning to review the existing environmental standards for the sea lice medicine, azamethiphos.</li> </ol> <p>SEPA told the Panel that:</p> <ul style="list-style-type: none"> <li>• as previously advised, it considers that the deployment of appropriate systems to capture and treat medicine residues prior to discharge would provide increased flexibility for operators on medicine usage and enhance environmental protection and improvement;</li> <li>• it is not in receipt of any applications to discharge any new medicine with or without prior treatment of residues;</li> <li>• it has begun work to plan and support a wider review of its regulatory approach to azamethiphos discharges. The review will include consideration of the latest scientific evidence on toxicity and the results of targeted environmental surveys. SEPA hopes to be able to begin the latter next year having been delayed as a result of the Covid-19 pandemic this year.</li> </ul>
<b>5.</b>	<p><b>Update – Charging scheme proposals</b></p> <p>SEPA has reviewed the costs of delivering its regulatory services for marine finfish farms and is in process of consulting on substantially increasing the charges for processing applications and increasing</p>

	<p>the subsistence charges for operators. Initial discussions have been held with the sector. A public consultation will be launched in late September/early October and will run for 8 weeks. The consultation will include detail of the operating costs SEPA are seeking to recover.</p>
<p><b>6.</b></p>	<p><b>Innovation – Semi-closed waste capture farm</b></p> <p>Representatives of Simply Blue Aquaculture presented proposals for the development of semi-closed containment farms in Scotland.</p> <p>Pre-application discussions are underway for an initial 4,000 tonne site in Beinn Reith in Loch Long and it is hoped operation will commence in 2023; with a second site following within 6-12 months.</p> <p>The Panel was told about the benefits Simply Blue Aquaculture believes this technology will deliver, including:</p> <ul style="list-style-type: none"> <li>- No chemical treatment of sea lice will be required Not act as a source of sea lice that could interaction with wild salmonid fish</li> <li>- Better fish welfare</li> <li>- Reduced benthic impact</li> <li>- Risk from seals is very low as they cannot see fish through bag, which has a secondary net, as well as seal nets above water level.</li> </ul> <p>Work is still being done to identify the best option for making use of the captured waste (options include desalination then use as fertiliser or anaerobic digestion).</p> <p>The technology is used in other countries to combat sea lice, but Simply Blue Aquaculture is pioneering capture of waste using this technology.</p> <p>The presentation was positively received by the Panel, with representatives of coastal community groups and environmental NGOs expressing strong interest and support for this type of technology being introduced into Scotland.</p> <p>Fisheries Management Scotland offered its help arrange conversations with local fisheries managers about the development proposal.</p>
<p><b>7.</b></p>	<p><b>Innovation – Further developments</b></p> <p>A representative of finfish producers provided an update to the Panel on innovation work:</p> <p><b>Large-scale offshore farming</b></p> <ul style="list-style-type: none"> <li>- One operator is now starting to scope potential locations for an ocean farm.</li> </ul> <p><b>Use of wellboats; and capture &amp; treatment of medicine residues</b></p> <ul style="list-style-type: none"> <li>- There is no proposed deployment of capture and residue treatment technology in Scotland as yet.</li> <li>- The sector is beginning to model releases of bath medicine residues from moving wellboats to assist mixing and dilution of the residues.</li> </ul> <p><b>Capture/partial containment of organic solids</b></p> <ul style="list-style-type: none"> <li>- MOWI is starting to explore potential trial in Scotland</li> </ul> <p><b>Reducing risk of sea lice outbreaks</b></p> <ul style="list-style-type: none"> <li>- Various barrier methods are being tried, including skirts, to prevent entry of sea lice into pens;</li> <li>- Tube/snorkel nets are starting to be deployed</li> </ul>

	<p>- Proposals are also in development to rear smolts to a larger size in order to reduce the length of time fish are at sea.</p> <p><b>SSPO Blueprint</b> SSPO provided a brief update about its developing SSPO vision, which will include ambitious environmental and societal pledges, for example to move to 100% renewable energy, 100% of feed from sustainable sources and 100% recyclable/biodegradable packaging. SSPO will put forward proposals and projects to achieve these goals.</p> <p><b>ACTION:</b> The Chair to work with the representative of the SSPO to decide how best to engage the Panel (either at a Panel meeting or other stakeholder event) about the SSPO vision.</p>
<b>8.</b>	<p><b>Covid-19 temporary regulatory position statements</b></p> <p>SEPA adopted temporary regulatory positions for several different regulated sectors to help them meet the challenges of the Covid-19 pandemic and minimise risks to the environment. Two temporary regulatory positions were adopted for the finfish aquaculture sector.</p> <p>One of these, covering monitoring conditions, fallow periods and biomass limits is still in place and will be kept under review.</p> <p>Between March and the end of August, 21 sites had made temporary use of the provisions allowing biomass to be temporarily higher than the limit in their permits. No sites had made use of the provisions to shorten fallow periods. Relaxations of seabed monitoring requirements, including delaying or cancelling monitoring, had been made use of at 53 sites.</p> <p>The second temporary regulatory position on the use of sea lice medicines expired at the end of August. Six sites had made use of this position between April and its expiry.</p> <p>SEPA noted and welcomed the low and responsible usage by the sector of the provisions of its temporary regulatory position on biomass limits and sea lice medicines.</p> <p>SEPA confirmed that:</p> <ol style="list-style-type: none"> <li>a) if a site had exceeded its normal licence limits but adhered to the terms of the temporary regulatory position, it would be treated as compliant;</li> <li>b) where monitoring has been missed under the position statement, liaison is being or will be undertaken with the operator to get monitoring back on track.</li> </ol> <p><b>ACTION:</b> SEPA to explore communication for stakeholders outlining the use of position statements.</p>
<b>9.</b>	<p><b>AOB</b></p> <p>A Coastal Communities Network representative requested that the Panel discuss:</p> <ol style="list-style-type: none"> <li>(1) SEPA regulatory policy, which it believes is encouraging development in more exposed, high energy areas of sea and, by doing so, contributing to an increased risk of fish escapes;</li> <li>(2) the recent escape at Carradale,</li> <li>(3) whether the current Scottish technical standards on farm infrastructure adequately take into account the type of storm events Scotland is now experiencing.</li> </ol> <p><b>ACTION:</b> SEPA to include escapes as a topic for discussion at a future meeting of the Panel</p>
<b>10.</b>	<p><b>Next meeting</b></p>

**ACTION:** SEPA will arrange next 2 meetings; in late (1) November or early December and (2) February and circulate draft agenda.

Suggested items for future agendas:

- Spatial planning / mapping
- Innovation update
- SSPO blueprint / look ahead (tbc)
- Fish escapes and SEPA's new regulatory framework
- Sea lice management
- medicine discharge assessment and control, including consideration of cumulative impacts and innovation in residue capture and treatment

Please email further suggestions to [aquaculture.regulation@sepa.org.uk](mailto:aquaculture.regulation@sepa.org.uk)