SCOTTISH ENVIRONMENT PROTECTION AGENCY

Minutes of

SEPA Finfish Aquaculture Advisory Panel

27 May 2020
Via Video Conference

Attendees:
Coastal communities (Coast/Coastal Communities Network); **Crown Estate Scotland**; **Environmental NGO** (Scottish Environment LINK - Marine Conservation Society); **finfish buyer** (Sainsburys, Aquascot); **finfish producers** (British Trout Association, MOWI, Scottish Salmon Company, Scottish Salmon Producers Organisation); **Inshore Fisheries Group** (West Coast Regional Inshore Fisheries Group); **Marine Scotland**; **Scottish Natural Heritage**; **Scottish Environment Protection Agency (SEPA)**; **Wild fisheries** (Fisheries Management Scotland)

Apologies: Salmon & Trout Conservation; **CoSLA** (The Highland Council);

1.	**Welcome and introductions**
	The Chair welcomed attendees and reiterated the purpose of the Panel; to provide a forum for those with an interest in the aquaculture sector to discuss issues affecting the sector and seek to reach a common understanding or approach.
2.	**Actions from previous meeting**

Action	**Status**	**Update**
Invite another buyer to join the Panel	**Closed**	The Chair welcomed Sainsburys' representative to the Panel
SEPA to check with Scottish Government regarding policies on growth of the sector	**Closed**	Marine Scotland confirmed that the 2030 targets were industry targets and do not bind to regulators. SEPA will support growth in line with environmental requirements
Biomass & feed consultation: SEPA to advise the Panel on what assessments it is obliged to undertake before making a decision	**Closed**	Response provided in letter to Panel in February
SEPA to provide advice to finfish producers on the phasing of existing sites onto the new monitoring requirements	**Closed**	Existing sites which are not failing environmental standards will be allowed a 26 week period to submit monitoring results as part of phasing to new requirements. New sites, those that have been significantly varied or failing sites will maintain the standard 16 week reporting timeframe
SEPA to ensure that all 2018 evaluations have been uploaded onto Scotland's Aquaculture Website	**Closed**	All 2018 data has been uploaded
SEPA will discuss its review of the charging scheme with the Panel at the next meeting	**Open**	The decision has been taken to delay the consultation due to Covid-19. The charging scheme will be discussed at a future meeting

SEPA to advise on regulatory options available that could facilitate consolidation of sites	**Closed**	Response provided in letter to Panel in February
Representatives of finfish producers to identify real or hypothetical examples of innovative approaches they would like to explore. SEPA to prepare a draft scope for strategic discussion session at the Panel	**Closed**	On meeting agenda
SEPA to provide written advice on its position with respect to increased medicine usage where effluent treatment systems have been installed	**Closed**	Response provided in letter to Panel in February

3. Covid-19 Position Statements

SEPA has adopted temporary regulatory positions covering monitoring, fallow periods, biomass limits and use of sea lice medicines (available on SEPA Coronavirus website).

SEPA has received 39 notifications so far under the Covid-19 position statements broken down as detailed below:

- 27 sites that haven't been able to carry out environmental monitoring
- 3 sites that have notified us of a breach of biomass limits
- 5 sites that have notified us of the intention to use azamethiphos more quickly.

Representatives of environmental NGOs and coastal communities told the Panel that they recognised the challenges of the Covid-19 pandemic and the need for such temporary regulatory positions.

SEPA told the Panel that the regulatory positions will be kept under review as lockdown restrictions change. Operators and stakeholders will be given as much notice as possible about any revisions or extensions to the positions or the withdrawal of the positions.

Biomass:

Representatives of coastal communities asked how potential impacts on sensitive seabed features (e.g. oyster beds) had been taken into account. SEPA advised that it had worked closely with SNH to develop risk assessment guidance for operators. The guidance is published as an appendix to the regulatory position statement.

Representatives of finfish producers advised the Panel that operators were managing their sites to minimise the need to make use of the regulatory position on biomass limits, including by switching to maintenance diets.

Medicine use:

Representatives of coastal communities asked how risks from swifter administration of treatments with the sea lice medicine, azamethiphos, on shellfish had been taken into account.

SEPA advised the Panel that the conditions of the regulatory position had been carefully developed to protect shellfish farms and the wider environment.

A representative of finfish producers advised the Panel that residue testing on fish after a full concentration dose of azamethiphos found levels of residue to be well below the maximum allowable limit and, in most instances, below the traceable limit.

A representative of finfish producers also advised the Panel that the sector was planning to collect data to help improve understanding of the effects of different medicine use strategies on the environment. Consideration of implications for shellfish could be built into this study and the results shared with the Panel.

Action: SEPA and SSPO to liaise on scope of study.

A representative of wild fisheries interest asked how SEPA had taken account of risks to wild salmon from sea lice in designing its temporary regulatory positions.

SEPA explained that a key purpose of SEPA's regulatory position on the use of sea lice medicines is to help finfish producers remain in control of sea lice infestations during the Covid-19 outbreak.

The separate temporary regulatory position on biomass limits is underpinned by a risk assessment framework. This has been designed to help operators identify sites where, to help keep risks to the environment to a minimum, every effort should be made to stay within permit limits. The risk assessment framework includes consideration of interactions between sea lice from farms and wild salmon.

4. Innovation

Representatives of salmon producers presented 5 areas for potential innovation to the Panel. The Panel supported further exploration of all 5 projects.

(1) Farming in deeper and more exposed waters

- Design likely to be based on the world's first offshore farm, Ocean Farm 1.
- Would be able to operate in considerably deeper and more exposed waters than currently farmed in Scotland
- Potential for reduced/zero medicine use and reduced sea lice loads
- Potential for better survival rates for fish and increased capacity on farms leading to better yields.

There was general support from the Panel on the potential for this type of innovation to enable production to be located in less sensitive areas; better able to assimilate wastes. Selecting appropriate locations is therefore key.

Representatives of coastal communities and Fisheries Management Scotland advised that they would expect risks to migrating salmon, in particular, to be fully considered.

(2) Medicine effluent treatment

- Treating medicine residues in a system like Cleantreat to reduce the quantities of medicines discharged into the environment.
- The system could be installed on a support vessel, well-boat or at a land base.

There was general support from the Panel for this type of innovation. However, representatives of Coastal Communities told the Panel that they would like to see much more focus on innovations that help avoid the need to use medicines (e.g. by preventing sea lice infestations from occurring). They also

advised that they would like to understand the effluent treatment process and the disposal routes for captured medicine residues.

Representative of finfish producers suggested that it might be helpful for the company that has developed Cleantreat, Benchmark, to answer questions from the Panel at a future meeting.

(3) <u>New framework for bath treatment management</u>

- Collaboration with SEPA to improve understanding of the environmental fate and behaviour of bath treatment residues.
- Based on improved understanding, introduction of new framework for bath treatment regulation that help finfish producers release less active ingredient but treat lice effectively.

There was general support from the Panel for modernising and strengthening the framework for regulating bath treatments, based on the latest science. Representatives of coastal communities told the Panel that it would be important that this initiative does not distract from taking forward innovations that reduce or eliminate the need for medicine discharges.

(4) <u>Incentivise circular economy and low carbon approaches</u>

- Regulators could provide incentives (e.g. reduction in fees or flexibility in biomass limits), where producers have an approved environmental improvement programme.
- Environmental improvement programmes could include steps towards a lower carbon economy (e.g. use of renewables), moves towards a circular economy i.e. changes to waste management. It may also include downstream activities such as reduced packaging or airfreight logistics.

Representatives of finfish producers told the Panel that investing in circular economy/low carbon solutions was expensive. Incentives could help encourage and enable wider and more rapid adoption.

Representatives of coastal communities told the Panel that sustainability improvements could help secure a social licence for the sector and improve relationships between producers and other users of coastal waters. However, this should not be at the expense of local environmental protection.

Fisheries Management Scotland raised a concern that this item does not fall under innovation.

It was noted that this sort of approach might align with some of the recommendations of the Salmon Interactions Working Group.

There was general agreement from the Panel that appropriate mechanisms for incentivising investment in circular economy/low carbon solutions and other sustainability improvements should be explored.

<u>5. Recovery of solids from marine finfish farms and identification of beneficial use</u>

This is being done in other countries; however there is still work to be done e.g. to establish how to reduce salt content. It is also time consuming, costly and requires high energy use.
Capture of waste is currently being trialled at one site.

- Installation of a trial recovery of solid waste from a marine finfish farm
- Research potential for beneficial uses of the captured material, taking account of salt content etc.)
- Identify potential reduced impacts on the environment and, hence, potential for growth in areas where environmental capacity is constrained.

There was general support from the Panel for this innovation proposal. Representatives of coastal communities suggested that it would be helpful to speak to operators in Norway already capturing waste solids to understand how they manage the salt content to ensure beneficial use.

	Other Representatives of coastal communities and Fisheries Management Scotland asked that the Panel should also explore the semi-containment and full containment farming systems. Representatives of finfish farm producers agreed to add such innovations for discussion with the Panel at future meetings. SNH suggested that exploration of innovative acoustic deterrent devises would be of interest. **Action:** SSPO will re-draft the list of prosed innovation projects and email to SEPA for circulation, taking account of the request to include containment/barrier type projects. **Action:** SSPO and SEPA to further develop each area of work and continue to engage with the Panel.
9	**Next meeting**
	7th September 2020 Suggested agenda items: • Update on regulatory position statements • Spatial planning / mapping • Innovation update • SSPO blue print / look ahead (tbc if work has progressed) Please email further suggestions to aquaculture.regulation@sepa.org.uk