

Fisheries Management Scotland Fish Farming Meeting Minutes



17 November 2017

In attendance:

Alasdair Laing (Findhorn) (Chair)
Diane Baum (Lochaber)
Roger Brook (Argyll)
Chris Conroy (Ness)
Crispian Cook (North and West)
Paul Hopper (Western Isles)
Alan Kettle-White (Argyll)
Peter Jarosz (Skye and Wester Ross)
Shona Marshall (West Sutherland)
Bill Whyte (Wester Ross)
Keith Williams (Kyle of Sutherland)
Alan Wells (Fisheries Management Scotland)
Robert Younger (FishLegal)

Apologies:

Jon Gibb (Lochaber)
Derek Dowsett (Skye)
Giles Curtis (Western Isles)

Agenda

1. Welcome and Introductions

AL welcomed everyone to the second meeting of the FMS Fish Farming Committee and noted the apologies.

2. Update on FMS activities (paper)

A paper detailing recent FMS activities in relation to aquaculture was circulated prior to the meeting. This included meetings with Crown Estate Scotland, Marine Scotland and Marine Harvest and engagement through the 'Dumfries House' process. This work has focussed on the need for reform of the regulatory system, local monitoring of impacts and developing proposals for local engagement. No substantive issues were raised, other than those discussed under the agenda items below.

3. Update on local situation

Each area provided a short update on issues arising locally. These included:

- Sea lice and disease challenges.
- A large escape on Mull.
- Ongoing escapes in freshwater and possible research to assess introgression.
- Developing local engagement/ lines of communication and a concern that there has been disengagement at a local level which has corresponded with sea lice/disease issues on farms.
- Issues with the planning process and engagement with Community Councils.

- Development of a baseline genetic monitoring process for freshwater cage production in relation to proposed changes to ASC standards.
- Recent improvements in sea lice levels in one area were also noted.
- The possible impact of AGD and other diseases on wild fish. Advice from FHI suggests that AGD is a natural parasite that usually requires a trigger (such as stress) and may require fairly close contact between fish to become established. Symptoms include white patches and bleeding on gills. Some gill damage has been observed on wild sea trout but this was not as extensive as on local farms.

4. Function/effectiveness of the Committee to date – general discussion

Views were sought on how the Committee had functioned since it was established. The importance of ensuring that the Committee was informed of discussions undertaken by FMS was emphasised, whilst accepting that some elements of the work had to be reactive. The vital importance of coordination and information exchange was emphasised. It was agreed that the Committee would meet at least twice a year, but additional meetings would be scheduled if required.

AW committed to providing regular updates to the Committee. **ACTION: AW**

Committee members would ensure that any pertinent information was circulated to the Committee mailing list. **ACTION: ALL**

5. Local/national structure/agreement for information exchange (paper to follow)

The Committee has previously discussed the principle behind agreeing a *modus operandi* for local information exchange and wider engagement between DSFBs and Trusts and the salmon farming industry.

An early draft of a paper, under development by Marine Harvest, was circulated for comment, with the intention of ensuring a coordinated approach by the fisheries management sector. Whilst it was accepted that it was an early draft, there was general concern that the paper in question risked repeating the mistakes which led to the failure of the TWG and Area Management Agreements. Some members of the committee were reluctant to sign up to a formal process. However, it was felt that there may be value in a much simpler approach, which set out the means in which the two sectors would communicate, with a view to ensuring that both sectors understood what information they could expect to receive and under what time-scale. An important element of this was to ensure that the industry respect the fact that an agreement relating to local engagement and information exchange was not used in planning or in the media to suggest that the wild fisheries management sector were content with the *status quo*.

There was also discussion about the relationship between such agreements, Environmental Management Plans, and monitoring approaches being developed (see below). There was a strong view that a management agreement/ memorandum of understanding was distinct from an EMP and any attempt to agree one in place of an EMP should be strongly resisted. There was also concern that the EMP process was not working, that EMPs simply restate what the industry is required to do anyway, and that a much more meaningful process was required, with accountability and linkage between monitoring and farm management.

6. Monitoring of wild fish – developing the approach

An important element of Aquaculture Stewardship Council (ASC) certification is the requirement for local monitoring of wild fish, with an appropriate feedback loop to farm management. Recent Environmental Monitoring Plans, which are a requirement of some recent planning consents may also require such monitoring. The Committee agreed that this was an important work area for FMS.

AW has discussed the need for such monitoring with Crown Estate Scotland and Marine Harvest and all three organisations are keen to take this process forward. Marine Scotland Science have also expressed interest. The next step is to initiate a project, initially in Lochaber (which has both certified farms under ASC and a farm with a recent planning requirement to develop an EMP), but with a view to extending the process across Scotland ASAP. A steering group would be established comprising FMS, Lochaber FT, Crown Estate Scotland, Marine Harvest Scotland and Marine Scotland Science. It was agreed that AW, DB and AKW would participate in the process on behalf of the committee. AW would seek to arrange a meeting ASAP – **ACTION: AW.**

Other items of discussion included assessing (if possible) the potential for disease transfer and genetic introgression between farmed and wild fish and further thought as to how such monitoring might encompass Atlantic salmon in addition to sea trout.

The principle behind, and lack of progress on, EMPs was also discussed. Concern was expressed that such conditions could be changed via section 42, which if agreed, allow a developer to change a condition – see discussion below on alternatives to planning. Section 75 agreements (planning gain) were also discussed as a possible alternative.

7. Feedback on FMS-AST Workshop on ASC

The recent FMS-AST workshop on the ASC standards was discussed. The concerns around the apparent ease of applying for a variation request were emphasised, as it was felt that this had the potential to dilute the effectiveness of the scheme. RB highlighted ISO 9000 standards in other industries and emphasised that these can drive improvements through customer demand.

It was agreed that many of the principles included in the standards were potentially very helpful from a wild fish perspective, but that it was important to keep this under review.

8. Planning/regulation of the industry – developing thinking for reform

AW emphasised that FMS have taken every opportunity to push the case for changes to the regulatory system governing salmon farming, both with the Scottish Government and Industry. The current regulatory system does not provide a reliable or effective mechanism to ensure that any impacts on wild fish are appropriately managed, nor is there a mechanism for delivering changes to farm management. It is also apparent that the Town and Country Planning Act is not working from a wild fish perspective, and concern was expressed about the lack of integration of the recent SEPA consultation with other regulatory regimes.

There followed a discussion about the marine licensing system, as a possible alternative to terrestrial planning. This system may have the potential to provide more flexibility in approach, but there were also some misgivings. It was agreed that FMS would investigate this further. **ACTION: AW.**

9. Interaction with other Wild Fisheries Organisations

There was a short discussion about the work of Fisheries Management Scotland and how this might interact with other wild fish organisations. It was emphasised that it was important to ensure that the work of wild fish organisations in Scotland was complementary as ultimately, we all wish to see thriving salmon and sea trout populations and fisheries without negative impacts arising from salmon farming.

10. Financial support for fisheries management

AW provided an update on recent discussions with industry about financial assistance for fisheries management in the aquaculture zone. This was first mooted at the FMS Conference in March and discussed at the last Committee meeting. It was noted that discussions were at an early stage and

that a number of key issues still needed to be resolved. Should this be successful, a proposal would be put to both the Committee and the FMS Board for approval.