

Fisheries Management Scotland Fish Farming Meeting Minutes



25 July 2019

In attendance:

Alan Wells (Fisheries Management Scotland) (Chair)
Lucy Ballantyne (Lochaber)
Roger Brook (Argyll)
Richard Davies (Outer Hebrides)
Sean Dugan (Scottish Fisheries Coordination Centre)
Jon Gibb (Lochaber)
Alan Kettle-White (Argyll)
Alasdair Laing (Findhorn)
Ian Lindsay (Skye and Wester Ross)
Shona Marshall (West Sutherland)
Bill Whyte (Wester Ross) (by teleconference)
Keith Williams (Kyle of Sutherland)

Apologies:

Chris Conroy (Ness)
Derek Dowsett (Skye)
Paul Hopper (Outer Hebrides)
Peter Jarosz (Skye and Wester Ross)
Jason Laing (Western Isles)
Rob Whitson (North and West)
Bob Younger (Fish Legal)

1. Welcome and Introductions

AW welcomed everyone to the meeting and noted the apologies. It was noted that the main order of business was to discuss Environmental Management Plans (in the context of potential changes to the regulatory regime arising from the Scottish Parliamentary Inquiries) and that as much time as possible would be put towards this.

2. Update on local situation

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

- Argyll – Two key elements were highlighted: firstly a recent Environmental Management Plan (EMP) which has been agreed in Loch Shuna with Mowi and Kames – discussion was deferred until later in the agenda. The second major issue was the ongoing impact of a significant escape of rainbow trout at the mouth of the River Awe (33,000 fish). This has significant impacts on the fishery and serious resource implications for local management. It was noted that the same company (Dawnfresh) has plans to build four farms in the upper Clyde, positioned on the migration route for salmon from North Ayrshire, Argyll, Loch Lomond and the Clyde, in direct contradiction to the recommendations of the REC Committee.
- Lochaber – Two EMPs are currently being discussed with the industry, one of which focusses on freshwater pearl mussels. Wider strategy relating to engagement with the planning process was

discussed, emphasising proposals for increases in biomass relating to sensitive inshore sites. It was noted that the characteristics of sensitive locations for fishfish aquaculture have been highlighted through the Interactions Working Group. It was noted that some stakeholders will not have confidence in EMPs, and their associated monitoring, as a means of addressing impacts on wild fish. This was discussed further under agenda item 4.

- Skye and Wester Ross – The trust have been working with West Sutherland and Outer Hebrides to develop proposals for a nutrient enhancement project. AW pointed out that there was considerable interest in this at a national level, but also that there were a number of issues to address, including regulatory issues involving SEPA. Recent media coverage relating to inshore herring spawning areas was also noted. Recent media coverage of Mowi's intention to move production out of Loch Ewe was discussed. Mowi have also approached the Board and Trust with regard to developing an area EMP, along the lines of that developed with Argyll in Loch Shuna.
- Western Isles – Communication between some fish farmers and trust/DSFB is now improving, although issues remain with one company in particular.
- West Sutherland – Loch Duart are currently going through a consolidation exercise to develop more usable larger sites (without increasing overall biomass). This will result in the development of a number of EMPs, including for freshwater pearl mussels.
- Kyle of Sutherland – rotary screw traps have now picked up farmed smolts every year that traps have been operated for this purpose. Until recently, the Board has paid for this work, but this year Cooke aquaculture and Migdale smolts made a financial contribution. Work undertaken by Marine Scotland has demonstrated that both sites on Loch Shin have lost fish, despite no reported escapes.
- All members of the group noted the large variation in engagement and cooperation between the different companies operating in Scotland. Some companies are very open to work positively with the wild fish sector, whereas others are much more problematic and are operating in isolation from key stakeholders. It was agreed that this is a significant issue that needs to be addressed.

3. Update on Interactions Working Group

AW and RB have now attended a number of meetings of the IWG. As the group is aware, two papers (one encompassing management of sea lice on wild fish, wild fish monitoring, and areas sensitive to hazards arising from fish farming, and one on addressing escapes) were submitted by Fisheries Management Scotland and these were well received by the group. The industry took some time to respond to these papers, and did so via a paper submitted at the last meeting. Whilst there were some areas of consensus, there were also elements that we could not agree to. Scottish Government have agreed to develop some draft recommendations for consideration at the next meeting based on the papers submitted to date. It is likely that there will be two or three more meetings and it was noted that there is a lot of work still to be completed to ensure that the process results in a useful outcome for wild fisheries managers. AW reported that he is developing a narrative on the REC Committee recommendations to help inform the IWG process. Once complete, this will be circulated to the committee for comment.

ACTION: AW to circulate narrative on REC committee recommendations.

The subsequent discussion centred around a number of key issues:

- The role of successor arrangements to EMPs – discussed below;
- Relocation/closure of inshore sites and/or shortening of the production cycle to benefit wild fish;
- Environmentally sensitive areas as identified by the REC Committee;
- The need to understand smolt movements (salmon and sea trout), particularly in the context of offshore/ high energy sites;
- The role of sea lice dispersal modelling.

4. Environmental Management Plans

RB provided an overview of an EMP developed with Mowi and Kames for the Sound of Shuna. This area includes a number of finfish farms, operated by two companies, but only one of the farms is subject to an EMP. The EMP, which was for an increase in biomass rather than a new farm, has now been signed off by both companies and the Argyll Board and Trust. The agreed EMP includes the following principles:

- The EMP will cover all farms in the management area (despite the formal planning condition only applying to one farm);
- It will require weekly reporting of sea lice for all individual farms;
- It was also include lice burden reporting (lice per fish multiplied by the overall number of fish);
- Sharing of information will not be under a confidentiality agreement;
- Lice connectivity modelling is included and will be ground-truthed with wild fish monitoring;
- Monitoring of wild fish, with a feedback to management (adaptive management) is included and will be funded by Mowi. This is based on the thresholds set out by Tarranger;
- A management request procedure (following measurement of impacts on wild fish) is included;
- An end of production cycle review is included;
- Many of the relevant principles of the ASC standard are included including an area lice threshold.

The agreed document has been circulated to the Interactions Working Group and relevant local authorities, with a view to the principles included in this EMP forming the basis of all future EMPs in Scotland. It was requested that these principles should be set out in a new document. **ACTION: AW.**

The subsequent discussion centred around a number of key issues:

- Stakeholder confidence in EMPs. AW noted that Fisheries Management Scotland are working with members to develop EMPs which are as robust as possible under the existing regulatory framework. However, there is a clear recognition that this process is not fit for purpose, as the EMPs are not adequately enforceable. On that basis, AW and RB are working to ensure that successor arrangements to Environmental Management Plans, which include appropriate feedback to management and associated enforcement powers form a key element of a reformed regulatory regime in Scotland.
- It was noted that the Scottish Government response to the REC committee only made reference to EMPs in relation to marine production. AW emphasised that this has been raised with Marine Scotland and the need for wild fish monitoring in both sea water and freshwater would continue to be emphasised through the Interactions Working Group. **ACTION: AW and RB.**
- The resources required to engage with the development of EMPs, and subsequent monitoring of wild fish was discussed. Given that some areas have extensive aquaculture production and limited staff resources, it was agreed that further thought was required to assess how this process can be managed, with appropriate input and oversight from the fisheries management sector in future. The importance of using consistent daily rates for such work was emphasised. **ACTION: AW** to coordinate sharing of information to ensure that Trusts are using consistent daily rates. **ACTION: SM** to share the advice originally developed by RAFTS.
- All districts were asked to consider the resource requirements further, based on the number of farm management areas in their districts, and the sampling sites (bag nets and/or sweep netting sites) that would be required to assess impact. It was also noted that the emphasis of assessing impact would require sampling to occur on a more regular basis than is currently the case under the SG-funded sweep netting programme. This will require the SFCC protocol to be reviewed and updated. This process could also be used to develop consistent/ standardised reporting of results.

ACTION: ALL to consider the likely resource requirements for wild fish monitoring in all farm management areas.

ACTION: SD to convene a meeting to discuss SFCC protocols and subsequent reporting.

- Related to the above, Fisheries Management Scotland and SFCC were asked to consider issues relating to data management, collation and storage. **ACTION: SD**
- AW highlighted that he is currently exploring options to fund specific project officers in order to support members in engaging with these processes. Further updates will be provided as they become available.

5. Mapping of aquaculture information

Sean Dugan presented recent work on mapping a range of information relating to wild-farmed fish interactions. It was agreed that this was a very useful exercise and SD was congratulated for his work to date. Once finalised, the mapping resources will be available to all DSFBs and Trusts, primarily with the purpose of informing the planning process.

ACTION: ALL to provide sweep netting data from 2012-2017.

ACTION: SD to complete the mapping exercise and work with AW to ensure that the underlying data is accurate and fit for purpose.

ACTION: SD to share mapping tools with committee members for further discussion.

6. Closer communication and working between west coast trusts

Ian Lindsay highlighted a wish to see a greater degree of cooperation at a strategic level on projects etc. It was agreed to keep Fisheries Management Scotland in the loop as any such projects progress, in case there is a national policy element that should be taken into account in any subsequent applications.

7. AOB

None.