

Fisheries Management Scotland

Fish Farming Committee Meeting Minutes

Date: 10 November 2022

By Videoconference

Present

Alan Wells (FMS) (Chair)	Malcolm MaCormick (Lomond)
Roger Brook (Argyll)	Shona Marshall (West Sutherland)
Peter Cunningham (Wester Ross)	Charlotte Middleton (FMS)
Jon Gibb (Lochaber)	Isabel Moore (Skye)
Paul Hopper (Outer Hebrides)	Rob Pitkin (Lochaber)
Peter Jarosz (Wester Ross)	Brian Shaw (Ness)
Alan Kettle-White (Argyll)	Charlotte Small (Skye)
Alasdair Laing (Findhorn)	Mirella Toth (Lochaber)
Jason Laing (Western Isles)	Keith Williams (Kyle of Sutherland)
Morven MacKenzie (West Sutherland)	Bob Younger (Fish Legal)

Apologies

Stuart Brabbs, Richard Davies, Rob Whitson.

1. Welcome and Introductions

AW welcomed everyone to the meeting and noted the apologies.

2. Local updates

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

- Argyll
Sea lice monitoring included the use of both sweep nets and a coastal fyke net in the Sound of Shuna, after some challenges finding a suitable location. Monitoring in lower Loch Linnhe, in conjunction with the Lochaber Fisheries Trust, detected some concerning lice levels, and this has been raised with relevant fish farm operators. Loch Fyne saw lower lice levels this year, whilst there were moderate levels of lice on sea trout sampled in Loch Na Keal. Additionally, the Trust contributed significantly to trapping and tagging fish in the Awe and Etive for the West Coast Tracking Project.

One juvenile pink salmon was caught and reported this year, and reports of escaped rainbow trout have not yet been recorded on the FMS app. Additionally, an escape in Loch Awe has yet to be publicly reported by the Fish Health Inspectorate (FHI).

The Committee noted the recent decision of the Loch Lomond and Trossachs National Park Authority to refuse an application for a semi closed containment unit in Loch Long. Whilst it was felt that Loch Long was the wrong location for this development, there was general

agreement that semi-closed containment technology could have benefits in locations where fish farming is already established.

ACTION: AKW to ensure that escaped farmed fish are reported on the FMS app.

- Lochaber

The Lochaber Fisheries Trust went through some personnel changes earlier this year but have still managed to undertake a significant level of monitoring work in 2022, including work under Environmental Management Plans. This included Freshwater Pearl Mussel monitoring where some unusual parasites were found on sea trout (not *L. Salmonis*). The Trust successfully deployed and sampled sea trout using a coastal fyke net at multiple sites and also supported the West Coast Tracking Project through trapping and tagging fish on the Loy and Lundy.

JG reported that there has been a complete crash of grilse numbers across the region in 2022 and there are concerns that the significantly high lice levels on wild sea trout sampled in 2021 may have contributed to this. It was noted that Mowi are trialling a shorter production period for their farms in Loch Linnhe.

- Skye

The Skye and Lochalsh Rivers Trust faced a number of difficulties in completing monitoring due to inclement weather. Lice levels in areas associated with EMPs were somewhat lower than last year, but there were worryingly high lice levels in other locations. The Trust has raised these issues with the relevant fish farms. A coastal fyke net was deployed for the first time this year, though it was a challenge to find a suitable location. The Trust has also started looking into gill health challenges on wild fish.

Concerns were raised over continued applications for increased biomass for farms around Skye. It was noted that the Operators Working Group meeting was re-established this year and that Highland Council attended, providing a good forum for discussion.

- Loch Lomond

Several reports of escaped farmed fish being sighted and caught in the river Leven presented a challenge for the Lomond Trust in September. The escapes have been reported via the FMS app, and also directly to FHI.

- Ness

There were 26 reports of finnock-sized escapes (6 fish in-hand with the DSFB) in late August and the Board have been in touch with FHI and Mowi to assess the causes and potential consequences of this escape. The Trust collected DNA samples for FHI and have been provided with a report identifying the genetic strains that were found (AquaGen and Mowi Ireland). At the time of the meeting, FHI had not yet conducted a site visit to further assess the situation. The Loch Ness and Loch Garry sites remain of concern for this reason, and the Trust has raised these concerns with the auditing body who will be assessing the sites against the ASC Standard.

- Kyle of Sutherland

The DSFB set out traps on Loch Shin this year with the primary aim of moving wild fish below the hydro-electricity dam – escaped farmed fish are often also caught in the trap and this year

has been no exception. Any escaped farmed fish caught are reported to FHI. There remains an outstanding requirement for Migdale Smolts to establish an Environmental Management Plan for their site on Loch Shin, and the Board is working alongside FMS and Highland Council to progress this and commence routine genetic monitoring from next year.

- Western Isles

Both the Board and Trust are engaged in Environmental Management Plans on the Western Isles and have been working to find suitable means of monitoring wild fish to feed into effective management of the EMPs. The West Coast Tracking Project has gone well this year, with fish trapped and tagged at two sites. Resourcing continues to be a challenge for the Trust with multiple projects ongoing.

ACTION: CM to follow up with the Board about latest progress on the Plocrapol EMP.

- West Sutherland

Sea lice monitoring went well in 2022, with few lice found on wild sea trout. The Trust reported some issues with gill disease on wild fish. Amoebic Gill Disease (AGD) and Proliferative Gill Disease (PGD) have been a problem in the Laxford farms and FHI has been involved to discuss next steps. The Trust's involvement in the West Coast Tracking Project has been very positive.

- Wester Ross

Wild fish monitoring was undertaken using both coastal fyke nets and sweep nets this year, with some delays in securing the required permissions to deploy the coastal fyke net. Some escapes were detected this year in the Kannaird river, and have been reported to FHI, but had not yet been reported via the FMS app. The Board continues to engage with the industry operating in Loch Torridon on their required Environmental Management Plan and, with the support of FMS, are engaging with Highland Council and Marine Scotland Science and Policy on this.

ACTION: PC to report escapes via the FMS app.

- All

The Committee discussed wider concerns around fish movement between farms, or between Fish Management Areas, and the implications that this management practice might have for wild fish. Additionally, the Committee agreed that there is a need to look at gill health in more detail in future wild fish monitoring.

ACTION: CM to re-circulate link to app for reporting escaped farmed fish to all members.

ACTION: CM to facilitate a further meeting to discuss gill health monitoring, and/or a training event as appropriate.

3. Scottish Government and Regulation

AW and CM provided an update on recent engagement with Marine Scotland on the approach to delivery of the Salmon Interactions Working Group (SIWG) recommendations. The discussion included an update on the range of current and future workstreams such as the escapes workstream, the SEPA sea lice framework and issues around the published data for fish farms.

AW and CM gave the Committee an overview of FMS engagement on the Aquaculture Vision which is due to be published by the end of 2022. The Committee want to see the Vision be as ambitious as possible in looking to the future of the industry and that the future of freshwater production in particular should be addressed.

AW gave an update on the Scottish Aquaculture Council, the new group established to act in an advisory capacity to Scottish Ministers with regard to aquaculture. The Council's remit includes the regulatory review, development of the Scottish Government aquaculture vision and Scottish Ministers have re-stated their commitment to delivering the actions outlined in the Scottish Government response to the Salmon Interactions Working Group, and the SEPA sea lice risk assessment framework.

4. Engagement with Fish Health Inspectorate

The Committee discussed recent engagement with the Fish Health Inspectorate (FHI) in the context of the Salmon Interactions Working Group recommendations to deliver a robust, transparent, enforceable and enforced regulatory system. With regards to escapes, the Committee agreed that an urgent response is needed from FHI to assess any potential escape event, and that this process should be as transparent as possible. Concerns were also raised with regards to 'trickle' escapes that are difficult to account for or manage.

Marine Scotland have confirmed to FMS that only two Advisory Letters have been issued by FHI to operators under the 'Sea lice policy – enforcement regime' in 2022, and there was frustration that this was insufficient to capture the reality of the situation in Scotland. The enforcement regime for sea lice has two levels; the increased monitoring level of 2.0 average adult female lice per fish, and the intervention limit of 6.0 average adult female lice per fish. In 2022, fish farms across Scotland reported sea lice numbers that reached or exceeded the increased monitoring level on 347 occasions and the intervention limit on 9 occasions (out of 49 weeks reported at time of writing).

AKW gave an overview of a difficult sea lice situation in Loch Etive over the past two years where sea lice levels on wild fish were as high as 18 lice per fish. The Trust is looking to take a more strategic approach to working with FHI going forwards.

5. SEPA Sea Lice Risk Assessment Framework

The Committee discussed the developing SEPA sea lice risk assessment framework. It is encouraging that SEPA will now consider sea trout under the framework and outline a clearer roadmap to including existing farms within the framework. It was noted that SEPA and the Scottish Government remain committed to this approach despite significant push back from the industry. The West Coast Tracking Project will be designed in 2023 to specifically provide information on transit times through sea lochs (and therefore potential exposure time to sea lice) – important information for the developing framework.

ACTION: CM to circulate invite to next SEPA stakeholder workshops.

6. Monitoring

CM informed the Committee that the SFCC sea lice sampling protocol is being updated, recognising that it has not been revised in some time.

The Committee discussed the future of wild fish monitoring associated with finfish farming in Scotland under the current and future regulatory structure. It was agreed that the Trusts have

accumulated many years of knowledge and expertise in monitoring sea lice on wild fish. Despite some concerns around resourcing this work at scale, it was felt that Fisheries Trusts should be in a position to take on any future wild fish monitoring as part of the new regulatory regime. The Committee also discussed the possibility of further collaboration between Trusts, and recognised the role of Trustees in building capacity within the Trusts.

ACTION: AW and CM to meet with SEPA to discuss the future of wild fish monitoring.

ACTION: CM to set up a workshop to discuss the revised SFCC protocol and to invite Alison Baker to share learnings on building capacity and resource in the Forth Rivers Trust. The discussion on the latter should be open to Trustees.

It was noted that a revised approach to publishing wild fish monitoring data (i.e. closer to 'real time') may be needed in future under the SEPA framework so that SEPA can act in a timely manner to respond to any issues that may arise.

7. Industry Engagement

The Committee discussed the role of engagement with industry both at a local and national level. It was agreed that a valuable part of CM's role was to flag specific issues (positive or negative) with individual companies, regulators or government agencies as appropriate, and to provide a central point of contact for both FMS members and the aquaculture industry to engage on wild-farmed interactions. In addition, it is useful to have the understanding of the current regulatory landscape at a national level for local interactions meetings, and vice versa.

ACTION: CM to maintain dialogue with members as to how the Aquaculture Interactions Manager position can best continue to support members in their engagement with industry.

8. FMS Position on Aquaculture Stewardship Council

The Committee discussed the Aquaculture Stewardship Council (ASC) voluntary certification scheme and the recent changes made to the Salmon Standard. Notably this includes a revision to the sea lice indicator which weakens the sea lice threshold and significantly undermines the intent of the indicator to protect wild fish.

The Committee expressed unanimous disappointment in this latest dilution of the standard (following on from the removal of the prohibition on open-cage production of smolts in freshwater lochs) and agreed that ASC could not be considered as a credible form of protecting wild fish. It was agreed that a position statement should be published on the FMS website and highlighted to relevant stakeholders. None of the above would prevent FMS members from engaging as stakeholders in the ASC process as appropriate in future. Applications for variation requests were specifically mentioned in this regard.

ACTION: CM to draft position statement and circulate for agreement.

9. AOB

The Committee briefly discussed inshore fishery issues, and it was mentioned that the RAINE Committee is undertaking an investigation and Trust biologists may wish to provide input.

The date was agreed for the next Fish Farming Committee meeting.

ACTION: CM to send invite for next Fish Farming Committee meeting.