

Fisheries Management Scotland

Fish Farming Committee Meeting Minutes

Date: 09 March 2023

By Videoconference

Present

Alan Wells (FMS) (Chair)	Morven MacKenzie (West Sutherland)
Roger Brook (Argyll)	Shona Marshall (West Sutherland)
Peter Cunningham (Wester Ross)	Charlotte Middleton (FMS)
Richard Davies (Outer Hebrides)	Rob Pitkin (Lochaber)
Paul Hopper (Outer Hebrides)	Charlotte Small (Skye)
Alan Kettle-White (Argyll)	Bob Younger (Fish Legal)
Alasdair Laing (Findhorn)	

Apologies

Stuart Brabbs, Jon Gibb, Peter Jarosz, Jason Laing, Malcolm McCormick, Isabel Moore, Brian Shaw, Mirella Toth, Keith Williams, 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

There were a number of updates relating to planning for finfish farms in the Argyll & Bute area. Loch Long Salmon are appealing their planning application which was refused in Loch Long by the National Park Authority. Loch Long Salmon have also submitted a second application in Loch Linnhe within the Argyll & Bute Council area. Screening and Scoping is underway for a new Bakkafrost site off the coast of Little Colonsay, and concerns were raised that this could negatively impact sea lice levels in Loch na Keal. The Trust has received notification from SEPA that it intends to approve a CAR licence for Bakkafrost's proposed North Arran farm site which was refused planning permission and also turned down at appeal. It was noted that Mowi may be looking to increase the biomass at their Carradale farm site. Mowi have also recently purchased Dawnfresh but any changes in operation remain unclear.

ACTION: CM to arrange meeting between Argyll and Lochaber to discuss the new Loch Long application.

- Lochaber

The Trust gave an update to the Committee, stating that Mowi's Upper Linnhe sites are now on a one-year production cycle, with fish then being transferred to a more exposed site, but

that other sites remain on a 'typical' production cycle. The Trust will continue monitoring sea lice infestation pressure in Loch Linnhe this year.

JG was unable to attend the meeting but provided a short update to be shared with the Committee. This included concerns around Loch Long Salmon's new application in Upper Linnhe and high sea lice levels at Mowi's site in Loch Leven. There is also an ongoing discussion with Mowi regarding their approach to a single year production cycle in Upper Linnhe. To enable this, Mowi have stated their intention to request a temporary 500T biomass increase for July to October in the Upper Linnhe sites in order to avoid challenges with micro jellyfish in the more exposed sites to which the fish would be transferred.

- Skye

The Trust is in the process of confirming monitoring work associated with Environmental Management Plans (EMPs) this year with Kames, Organic Sea Harvest, Bakkafrøst and Mowi. At a recent meeting held between the Trust, Highland Council, Organic Sea Harvest and Fisheries Management Scotland, a monitoring approach was agreed for the Invertoe and Culnacnoc Organic Sea Harvest EMP sites using a coastal fyke net this year. The Trust has also been in discussion with Mowi regarding their treatment plan ahead of this year's smolt run. Gill health issues for farmed fish have impacted the ability of fish farms to undertake treatments for sea lice. Subsequent impacts on wild fish are a concern which need to be closely monitored.

- Western Isles

The Trust is currently planning monitoring work for this year, including that which will form part of local EMPs. There are currently plans for two new fish farms in the Western Isles; Bakkafrøst are investigating the suitability of the North Ford area (and have asked the Trust to provide a quote for relevant monitoring work), and Mowi have put in a planning application for a 'Stulaigh South' site near their existing 'Stulaigh' site. There are concerns about the proximity of the latter to Barb fishery which supports both salmon and sea trout.

- West Sutherland

The Trust is planning the monitoring work to be undertaken this year, including work for local EMPs. In terms of local aquaculture developments, it was noted that Bakkafrøst are investigating a new site in Enard Bay.

- Wester Ross

On EMPs, the Trust noted that monitoring for the Applecross EMP is yet to be finalised for this year, and that discussions around the Loch Torridon EMP are ongoing, with the relevant farms now in their second year of production. Mowi have applied to build a new hatchery in Dundonnell (Ardessie), in a refurbishment to their existing site. There was some discussion about the availability of biomass data for freshwater sites.

PJ was unable to attend the meeting but provided a short update to be shared with the Committee. In addition to the above update from the Trust, this included concerns over the ongoing discussions around the Loch Torridon EMPs and Mowi's recent acquisition of 75% of Wester Ross Fisheries Ltd.. An S42 planning application (for the removal of a 10-year term condition at the Ardmail sea farm) has also been submitted by Wester Ross Fisheries Ltd. to

Highland Council, and WRASFB has responded to object to the granting of a permanent planning consent.

ACTION: CM to check data submission requirements for freshwater sites.

3. SFCC Protocol – Updates and Next Steps

CM provided an overview of suggested updates to the SFCC sea lice monitoring protocol, including a new section on data analysis. Once the revision is fully drafted, it will be circulated to Marine Scotland and then shared with the SFCC Management Committee for final approval before it is implemented. It was noted that some areas are looking to understand recapture rate in the sea lice sampling undertaken by Trusts, and Bakkafrøst are investigating photo imaging software capable of doing this.

ACTION: CM and SR to move ahead with the SFCC Protocol updates and consider options to assess recapture of individuals.

4. Reporting Apps

SR gave an overview of the three reporting apps developed by FMS (for pink salmon, fish farm escapes and fish disease), and the dashboard functionality that is now live on the website. Links to all of the apps can be found on [the FMS website](#). Whilst the focus of the discussion was on the fish farm escapes app, the Committee was reminded to share the links for all the apps widely and encourage users to report any incidents as they occur.

5. Gill Health Monitoring – Updates and Training

Following a presentation on gill health given by Bakkafrøst at a recent workshop, the Committee agreed that it would be useful to progress training on visual scoring assessments of gill health for wild fish sampled during routine sea lice monitoring.

ACTION: CM to move this forwards with Bakkafrøst.

6. Fish Farming Regulation and SEPA Sea Lice Framework

CM and AW gave the Committee an update on progress towards a new regulatory framework for sea lice. Following the latest SEPA workshop, AW and CM met SEPA to discuss the approach. A further meeting is planned with SEPA, Marine Scotland, Marine Scotland Science and Crown Estate to discuss the approach to wild fish monitoring in 2023 ahead of the framework being established. The next consultation on the framework is expected by the end of April.

The Committee discussed regulatory approaches to fish farm escapes and was reminded to report any escaped fish farm parr via the [Fisheries Management Scotland app](#).

ACTION: CM to keep the Committee appraised on progress on the forthcoming SEPA consultation and regulation of escapes.

7. Planning Updates

CM provided an overview of all current and ongoing planning applications with Local Authorities and CAR licence applications with SEPA with the Committee. It was agreed that Fisheries Management Scotland would maintain an overview of the status of planning applications and CAR licenses, to support members in their ongoing engagement with these processes.

ACTION: CM to maintain an overview of the status of planning applications and CAR licenses.

8. FHI Engagement Update

CM met with FHI to discuss the lack of obvious regulatory action regarding the Scottish Government Sea Lice Policy. Previous discussions with Marine Scotland indicated that only 2 letters had been issued in 2022. FHI stated that they are in regular contact with fish farm operators to understand sea lice management where sea lice levels are elevated. The Committee was keen to fully understand the scope of this engagement and action taken ahead of Advisory Letters being issued. The Committee also expressed frustration with how escapes are published, highlighting an example of verified escaped farmed fish in Loch Awe in 2021 which were not reported publicly, as the farm was not found to be at fault.

ACTION: CM to follow up with FHI.

9. Update on ASC Engagement

CM gave an update on FMS engagement with the Aquaculture Stewardship Council (ASC) following the publication of our agreed [position statement](#) in December 2021. CM sent a short statement to Lloyd's Register to be shared at the upcoming ASC Tripartite (an annual meeting which takes place between Conformity Assessment Bodies (CABs), ASC and the accreditation body, ASI) meeting which further highlights the disappointment of FMS and our members regarding the changes to relevant indicators relating to sea lice. AW also met with ASC to further stress our concerns around the position and direction of ASC. There was appetite to share our position more widely, and CM will follow up with BY.

ACTION: CM to follow up with BY.

10. AOB

Upon request of JG (who shared a written update), it was noted that the Salmon Scotland Wild Fisheries Fund closes at the end of the month and funding is available for biodiversity and conservation projects of any size. It was noted that FMS had put a lot of energy into ensuring that the original fund included a robust governance mechanism through an independent third party, and that the changes to this process were very disappointing.

The Committee agreed that the next meeting would be held on Wednesday 4th October.

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