

Fisheries Management Scotland

Fish Farming Committee Meeting Minutes

Date: 04 October 2023

By Videoconference

Present

Alan Wells (FMS) (Chair)	Alasdair Laing (Findhorn)
Stuart Brabbs (Ayrshire)	Malcolm MaCormick (Loch Lomond)
Roger Brook (Argyll)	Isabel Moore (Skye)
Peter Cunningham (Wester Ross)	Charlotte Middleton (FMS)
Richard Davies (Outer Hebrides)	Rob Pitkin (Lochaber)
Chris Daphne (Ness)	Charlotte Small (Skye)
Jon Gibb (Lochaber)	Sue Ward (Wester Ross)
Peter Jarosz (Wester Ross)	Keith Williams (Kyle of Sutherland)
Alan Kettle-White (Argyll)	Bob Younger (Argyll)

Apologies

Paul Hopper, Jason Laing, Shona Marshall, Brian Shaw, Rob Whitson, Willie Yeomans.

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
Wild fish monitoring in Lower Linnhe, Loch Etive and Sound of Shuna all found high lice numbers on sea trout where samples could be obtained, noting that the number of trout that could be caught for sampling dwindled across the season. The fyke net used for monitoring in the Sound of Shuna was removed early due to concerns about fish welfare. Generally, fish sampled in Loch Fyne and the Firth of Clyde appeared to have low lice numbers, but it was challenging to catch equivalent numbers of trout at the Mull and Arran sites to be able to fully assess lice pressure in those locations.

Farm lice levels in the Sound of Mull, Lower Linnhe and Sound of Shuna appeared to be over the industry's Code of Good Practice thresholds from the middle of the defined sensitive period and throughout the summer. In the Sound of Shuna, Kames and Mowi do not have synchronous production cycles which presents an ongoing challenge for farms to manage lice levels in the area. However, it was noted that Bakka Frost appear to have had generally better lice control this year.

Mowi have bought the Dawnfresh sites in Loch Etive and have applied to farm salmon in those sites for two 5-month cycles (with a fallow period) each year. This will facilitate more of a 'firebreak' in sea lice levels in Loch Etive than current operations allow and may support a move towards trialling a single-year production cycle in other marine sites. Wider issues with jellyfish and mortalities persist across farms in the catchment.

It was noted that there were very few 2SW salmon caught in 2023, although there were a few more grilse than in 2022.

- Ayrshire

There have been notably low catches in Ayrshire this year. A video camera system has been in place over the last few years to verify fish counts, and numbers appear to be dwindling.

Bakkafrost are in the early stages of investigating a new smolt-rearing facility in Fairlie. The proposed site would be an on-land RAS system using freshwater pumped from a reservoir to create larger smolts for their marine sites. The Trust have been engaging with Bakkafrost to better understand the proposal and highlight wild fish and wider environmental considerations, including the concern over escapes during fish transfer.

- Lochaber

The Trust found high lice levels across a number of monitoring sites this year, including some very high lice levels in upper Linnhe, and has been engaging with the relevant fish farms on this issue. Many sea trout were caught for sampling earlier in the season, but fewer were caught as the season went on, and there were notably fewer bigger fish later in the season. Catch numbers more broadly have also been down this year, particularly of 2SW salmon in the Lochy.

Mowi are looking to trial a one-year production cycle in Loch Linnhe, and have committed to reviewing its effectiveness in managing lice burdens. Scottish Sea Farms are proposing an expansion in the Sound of Mull, and the DSFB are concerned about the additional biomass. A number of escapes have also been reported this year after some time without any, and issues relating to farmed fish mortalities and gill health persist.

- Loch Lomond

Returning salmon numbers have been very low this year, but no farmed fish escapes have been reported. The Trust has been monitoring the health of the Endrick water over the past 3 years, and results are showing very low fry/parr numbers.

- Ness

A number of escapes were detected this year and reported to both the Fish Health Inspectorate and Fisheries Management Scotland. FHI are investigating fish movement on local sites as a possible cause of these escapes. The Board are still awaiting the publication of FHI's report of the escaped fish reported last August.

- Skye

Good numbers of sea trout were sampled for monitoring earlier in the seasons, with fewer fish caught later in the season. High lice numbers were found on sea trout sampled in Portree. It was also noted that the Trust saw more Caligus lice than usual in Loch Slapin this year. The

coastal fyke net was deployed with support from Organic Sea Harvest, but there were challenges with jellyfish in and around the net. The Trust continues to engage with fish farm operators on local wild fish interactions and concerns, and noted that Loch Duart have bought the Grieg sites on Skye from Scottish Sea Farms.

- **Western Isles**

The Trust has undertaken a variety of monitoring work this season including assessing sea lice infestation pressures using seine nets and a coastal fyke net. The Trust highlighted a few forthcoming fish farm developments on the Western Isles. This includes a move from Mowi to move their North Shore site away from the river mouth in Laxay, and a new Mowi site in South Uist (to which the Board objected). Bakkafrøst have also proposed a new site, North Gravir, which would introduce a second operator within that Farm Management Area, and may have implications for effective synchronicity and farm management within the loch.

- **Kyle of Sutherland**

The DSFB, alongside CM, recently met with Highland Council to discuss the ongoing challenges with an Environmental Management Plan and monitoring work required by Migdale Smolts who operate on loch Shin. A planning condition to monitor for impacts on local wild fish populations has been in place for over a decade and a programme of monitoring has not yet been implemented. This planning permission is temporary, and at the point of renewal it is expected that the operator will be required to demonstrate compliance with the planning condition, and provide evidence of monitoring work on local wild fish impacts to demonstrate the ongoing sustainability of their operations in the loch. The DSFB also noted that catch numbers were very low this year.

- **Wester Ross**

The Trust has undertaken a variety of monitoring work against a backdrop of difficult weather challenges this season. This included monitoring sea lice infestation pressures at a number of sites and deploying a coastal fyke net. The Trust expects that the Marine Directorate will be able to share more about their study in loch Torridon in due course.

3. West Coast Tracking Project

CM gave the Committee an update on the West Coast Tracking Project, thanking all those involved for their efforts in making the final year of the project a success. Acoustic receivers are now in the process of being collected. Further engagement with contributors to the project is expected later in the year.

4. SEPA sea lice framework, including EMP transition and the future of wild fish monitoring

The SEPA sea lice risk assessment framework consultation has now closed. The consultation mentions implementation of the framework before the end of 2023, which the Committee are keen to see SEPA deliver. CM and AW are engaging with SEPA about both the implementation of the framework, and the future of wild fish monitoring. CM noted that the approach to wild fish monitoring is still in the early stages of development, and will update members with developments as they occur. There is likely to be a transition away from the current use of Environmental Management Plans for monitoring as existing farms are brought under the

framework. The Committee discussed that it will be important to link any future wild fish monitoring with assessments of gill health in wild fish.

5. Loch Long Salmon

CM gave an overview of Loch Long Salmon and their intention to introduce semi-closed containment in Scotland in Loch Long and Loch Linnhe, and that the company are now exploring options for a third site.

The Committee discussed the merits and drawbacks of the two proposed operational models, post-smolt or full harvest, from the perspective of wild fish. The Committee expressed concerns about the tonnage of the farms, with the Loch Long proposal planning to farm 4,000T, and the Loch Linnhe site planning to farm 8,000T. Additionally, the proposed waste removal system has not been used elsewhere, and the company's previous salmon farming experience is limited.

ACTION: CM to schedule a meeting for the Committee with Loch Long to better understand their proposed technology.

ACTION: CM and AW to consider the FMS position based on the Committee's views of the post-smolt and full harvest production models.

6. AOB

PC raised concerns about eutrophication in the Wester Ross MPA, and its potential impact on sea trout, highlighting that the potential impact of dissolved waste arising from salmon farms needs to be better understood.

Committee members were reminded of the available [FMS apps](#) for reporting escaped farmed fish, fish disease and pink salmon.

ACTION: AW and CM to explore issues relating to eutrophication/dissolved waste on benthic features of importance to wild salmon and sea trout with SEPA, NatureScot and Marine Directorate.

ACTION: CM to set date for the next Fish Farming Committee meeting (in January).

7. Session on escapes with FHI and Marine Directorate

The Fish Health Inspectorate gave a presentation on their process around handling escape events, including site inspections and investigations. Committee members raised points around FHI resourcing for handling escape events, timeframes for the publication of investigations and the challenges of small 'little and often' escapes not often being captured. There were concerns that there is not a process in place for publishing escaped farmed fish reported by any non-fish-farm entity, and FHI noted that this is under review.

The Marine Directorate gave an update on the reform of the regulations on escaped farmed fish. The Committee informed the Marine Directorate that escapes in both marine and freshwater remain of concern, and that some rivers this year saw more escaped farmed fish than wild fish. The Committee was strongly of the view that there should be genuine consequences if farmers

fail to achieve zero escapes (in line with Scotland's NASCO commitment), and that financial penalties should be introduced as soon as possible. It was also noted that regulation to achieve this, should be based on achieving the NASCO goal on containment (an environmental outcome) as opposed to a process-orientated outcome such as meeting a Technical Standard.

ACTION: CM to circulate FHI and Marine Directorate presentations to Committee.