

PE1336/J

Ministear airson na h-Àrainneachd agus Atharrachadh Aimsir  
Minister for Environment and Climate Change

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Alison Wilson  
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TG.01  
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Dear Ms Wilson

### **PETITION 1336: SALMON AND TROUT ASSOCIATION**

I refer to Mr Cochrane's letter of 25 March 2011. Thank you for the opportunity to provide an update on actions taken by the Scottish Government, including in response to January's BBC report about increase in the range and use by fish farmers of chemicals to treat sea lice infestations.

Aquaculture and wild fisheries are both important sectors, making valuable contributions to Scotland's economy (including, of course, in fragile rural and coastal communities). We remain committed to the sustainable development of both – to supporting and protecting our iconic wild salmon stocks and to supporting the jobs and supply of heart-healthy, omega-rich food to UK and global consumers provided by Scottish farmed fish products. I had the opportunity to meet with salmon farming businesses and wild fisheries interests during my recent summer tour of Lewis and Harris. The visits were highly informative, rewarding and emphasised the importance of balancing growth of the aquaculture industry with the need to safeguard the wider marine environment. I will also be meeting representatives of both sectors over the summer.

### **Update on further actions taken by the Scottish Government**

The Scottish Government acknowledges continuing, important debate surrounding fish farm escapes; sea lice; the use of medicines to control sea lice; and the need to ensure any growth of the aquaculture industry is sustainable. Growth must also be within the carrying capacity of the aquatic environment and reflect the interests of other users of the environment in which it operates. As noted in previous responses to the Committee it is important to consider aquaculture in the context of developments since the publication of *A Fresh Start: The Renewed Strategic Framework for Scottish Aquaculture* in May 2009 and the progress of the Ministerial Group on Aquaculture and its working groups. The group last reported progress to Ministers on 23 February 2011: the report is available on the Marine Scotland website at: [www.scotland.gov.uk/Topics/marine/Fish-Shellfish/mingroup](http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/mingroup)

The Healthier Fish Working Group made a number of recommendations, including improved access to sea lice data and a new statutory reporting requirement to Marine Scotland for sea-lice treatment failures. We propose to consult on those recommendations this year.

We have a key focus now on sea lice and related research. In May, the Scottish Aquaculture Research Forum (SARF) facilitated an event which brought together Marine Scotland (including Scientists), farmed salmon producing companies, pharmaceutical companies, the Scottish Salmon Producers' Organisation (SSPO), the Bergen Sea-lice Research Institute, and other research organisations to discuss short, medium and long-term sea lice research. This led to plans for an international sea lice symposium later this year, through SARF.

The first meeting of a Joint Committee for Bilateral Co-operation on Aquaculture was held in Edinburgh on 29 March 2011. This flows from a Memorandum of Understanding signed by Scottish and Norwegian aquaculture Ministers in 2009, to deliver focused joint working on areas of mutual interest. Key aims include co-operation on control of fish diseases, developing best practice on engineering design standards and collaboration on research. Both Governments have agreed to focus on sea lice. We will discuss this further when I meet the Norwegian Fisheries Minister later this month.

Good progress has continued to be made on fish farm escapes and containment, through the Improved Containment Working Group. Reported fish farm escapes in 2010 were the lowest since statutory reporting began in May 2002: and we are on track for a further reduction this year. Work on developing a Scottish Technical Standard (STS) for fish farm equipment is well underway. An initial draft is expected to be completed by September and will also then be subject to consultation. The standard will apply to all Scottish freshwater and marine farms and will cover nets, pens and mooring systems. Also, through the improved containment group, an industry freshwater group has produced freshwater containment guidance which has been circulated to the wider containment group (including wild fish interests). In April, Fish Farmer magazine - working with SARF, SSPO and the improved containment group - published a 'containment special' on sharing best practice. This document has been well received by the industry and wider stakeholder community. We will also shortly award a contract for a research project into the impacts of freshwater smolt production.

The Committee may be aware of recent publications by SSPO and Rivers & Fisheries Trusts, Scotland (RAFTS). The SSPO published *Salmon Farming and Wild Salmon Catches: Let's Focus on the Facts* claiming combined published net and rod catch statistics show salmon farming has had no effect on wild salmon catches. In June 2011 RAFTS issued a press release utilising rod catch statistics to produce an analysis which they claim proves salmon aquaculture is responsible for declining salmon and sea trout populations in salmon aquaculture areas. These divergent interpretations underline the need for careful analysis and interpretation of available evidence. Marine Scotland Science is now carrying out an independent assessment of the catch data to determine what it shows and what its limitations are.

The Committee may also be aware that wild Atlantic salmon is one of the species that is protected under the EU Habitats Directive and both salmon and sea trout are currently included in the list of priority fish species in the UK Biodiversity Action Plan <http://jncc.defra.gov.uk/page-5164>. Scottish Natural Heritage is also developing proposals for a list of Priority Marine Features in Scottish waters and there is a possibility that salmon and sea trout will be recommended for inclusion on this list.

SNH is finalising the list in collaboration with JNCC, who advise us on nature conservation issues in offshore waters, prior to submitting the proposals to Ministers for approval. The aim of the list is to help prioritise action over the next few years under the three pillar approach to marine nature conservation set out in A Strategy for Marine Nature Conservation in Scotland's Seas: <http://www.scotland.gov.uk/Topics/marine/marine-environment/Conservationstrategy/marineconstrategy>

### **BBC report (28/01/2011) on increase in the range and use of chemicals to treat sea lice**

The reasons for increased use of sea lice medicines are quite complex and almost certainly due to a number of factors, but in general their increasing use is not in itself necessarily a matter for concern. It may be caused by increased production and/or by the development of more formal strategies for lice control in recent years: and may also be associated with a recognition by industry of the desirability of adopting integrated sea lice management practices, including the rotation of medicine use to avoid or slow the development of resistance.

The increased range of products reflects the introduction of the new medicine Alphamax (AMX), containing deltamethrin, in 2008 and the re-introduction of Salmosan, containing azamethiphos, in 2007. The addition of these products allows vets more choice in the available medicines, again helping to avoid repetitive use of a small number of products, which may promote the development of resistance. These treatments are administered by bathing fish in water containing the medicine rather than through feeding - the administration method for the treatment Slice, containing emamectin benzoate, and Calicide, containing teflubenzuron. Bath treatments use greater amounts of medicine than in-feed treatments and the increased use of medicines therefore partly reflects the method of treatment.

In summary, increased use of medicines may be due to a range of issues and practices related to attempts to control louse infestations. It is not in itself an indication of irresponsible use. Provided that these products are used within the licence limits imposed by SEPA, which aim to limit environmental impacts, increased use should not cause undue environmental concern. Reduced reliance on medicines is best managed through adoption of best practice in integrated pest management - for example coordinated treatments, fallowing of sites and stocking of single year class within Aquaculture Management Areas.

I hope this letter is helpful to the Committee in assisting its deliberations.

**STEWART STEVENSON MSP**