Supplementary written evidence from the Rivers and Fisheries Trusts of Scotland (RAFTS)

Rivers and Fisheries Trusts of Scotland (RAFTS) wishes to submit supplementary evidence to the Committee further to the evidence gathering sessions in December.

We would like to reiterate our strong support for reporting of sea-lice data from Scottish marine finfish farms at farm scale level. We made this position clear on this point in our written submission to the Bill Consultation in late 2012 as follows:

“RAFTS believes that the most appropriate approach to be taken re the collection and publication of sea lice data is for full public access to data in a disaggregated form. Although there is currently an industry-run database which reports on sea lice numbers in 6 regional zones we do not believe this is sufficient. The regional areas are large and do not make it possible to identify locations or units performing well and meeting necessary standards from those who are not. The publication of average figures over such regions simply does not allow the necessary focus on remediation measures to be taken or to be seen to be taken by the public. In 2010 there was reporting of lice counts significantly above the target thresholds in many of the regional unit areas. Without finer resolution reporting of lice numbers the public is left with no option other to assume that all farms are not able to meet threshold targets where this simply may not be the case.

We believe strongly that full public access to lice data in Scotland would allow:

i) Assessments to be made of the success or otherwise of lice control strategies and subsequent impacts on wild fisheries

ii) Allow and support the Fish Health Inspectorate to prioritise limited resources on problem sites as part of the on-going farm inspection process and so use public funds more efficiently

iii) The more effective and informed operation of the aquaculture planning process by providing farm scale information and performance history to accompany applications being made to expand existing or set up new production centres.

Currently applications largely state that they will adhere to the Code of Good Practice with regard to lice levels and the routine response to this by Marine Scotland Science is to state that if the target is met then the impact will be minimal (despite also stating that current industry practice as laid out in the Code of Good Practice is insufficient to protect wild fish). At the present time there is no way of assessing such claims, and indeed, under some circumstances in some areas RAFTS does not believe that operators are capable of meeting such targets.

The consultation states, and we agree, that this area is a key area of contention between aquaculture and salmon and freshwater fisheries interests. We believe that, if the industry is confident that sea lice levels can be controlled in line with the Industry Code, then there should be no concern in making such information public, in a disaggregated form and at a farm scale.
In fact we would contend there is a reputational risk in not making information available at this scale as currently all farms and units within the 6 regional reporting units will be considered to either pass or fail against threshold values. At the present time there is a high incidence of threshold exceedance.

We acknowledge need for data to be properly presented, explained and understood, to minimise the risk of misinterpretation or misuse. However, this is not a reason to withhold or sanitise data and would propose that the industry itself provides such clarification and advice for issue alongside the published data.

We believe that the principles for collection and publication of sea lice data should be as follows:

- All farms should report data on a weekly basis to Marine Scotland
- Sea lice data should be published monthly, on a farm by farm basis, on a publically available webpage (operated by Marine Scotland or the Industry)
- The webpage can be used to explain the data in whatever manner is deemed appropriate

However, in our view, it is fundamentally important and essential that raw data is available”.

This view is supported by Professor Chris Todd in his supplementary evidence to the Committee with which we concur. It is also a view shared by a wide variety of other organisations with an interest in this subject.

“From a scientific perspective I believe it essential that sea lice data should be collated and published on a farm by farm basis. Concatenating and pooling data for multiple farms (or sites) within a sea loch or bay and publicising a summary statistic would considerably erode their utility in ascertaining farm performance and would effectively preclude informative and detailed scientific analysis of potential interactions with both other farmed and wild fish.” (Professor Chris Todd – Supplementary Evidence)