

T: 0300 244 4000

E: [scottish.ministers@gov.scot](mailto:scottish.ministers@gov.scot)

Finlay Carson MSP

Convener

Rural Affairs and Islands Committee

By Email: [rural.committee@parliament.scot](mailto:rural.committee@parliament.scot)

03 May 2023

Dear Convenor,

As intimated in my letter of 4 October 2022, and further to the evidence session with the Committee on 7 September 2022, I committed to providing more information on progress made to address the recommendations made by the Rural Economy and Connectivity Committee in 2018 following its inquiry into Salmon Farming in Scotland. I also refer to your letter of 19 April 2023 which you sent on behalf of the Committee, requesting an update, and a summary of progress in implementing the recommendations of Professor Russel Griggs' review.

I am pleased to share a progress update with you, attached to this letter in **Annex A**. I am also taking this opportunity to update the Committee on some other developments in relation to aquaculture policy.

#### Monitoring and intervention levels of sea lice on fish farms in Scotland

In 2019, in an address to parliament, the previous Cabinet Secretary for Rural Economy committed to reduce the levels of sea lice on fish farms at which Scottish Government's Fish Health Inspectorate (FHI) takes monitoring and intervention action in accordance with farmed fish sea lice management policy, alongside introducing sea lice reporting legislation, which came into effect in 2021.

Sea lice monitoring and intervention levels were first introduced in 2016 at 3 and 8 sea lice per fish respectively, reduced to 2 and 6 sea lice per fish in 2018 and at that time there was a further commitment to reduce the monitoring and intervention levels to an average of 2 and 4 sea lice per fish respectively, unless there is '*compelling evidence to the contrary*'.

The policy context within which the fin-fish sector is operating has changed significantly since the commitment was given and I have made the decision that the commitment will not be pursued at this time. I will, however, review it at a future date given the importance of fish health within sustainable aquaculture.

A number of factors were instrumental in my decision, including limited availability of medicines and the veterinary implications of lowering the intervention limits further when it is possible that a treatment required to comply with Scottish Government policy could contradict a vet's view on the best option for the health and welfare of the farmed fish.

In addition, at the time the aforementioned commitment was made, a new working group had recently formed to consider the Parliamentary recommendations on the management of sea lice and the interactions between wild and farmed fish.

I was pleased to respond to the recommendations made by the Salmon Interactions Working Group on a new approach to managing interactions in October 2021, identifying the Scottish Environment Protection Agency (SEPA) as the lead regulator which would take forward a consultation on a new framework in line with the Salmon Interactions Working Group's advice. The first consultation on the framework concluded in March last year and a further consultation is planned this spring.

There will be an interaction between FHI's role in ensuring satisfactory measures are in place to protect farmed fish health and welfare and the new SEPA sea lice risk framework, aimed at protecting wild salmonids.

We are currently working with SEPA through the transition period to ensure effective use of both regimes and I believe that delaying changes to farmed fish health sea lice policy at this time is a more pragmatic approach.

It is important to note that analysis of reported weekly sea lice numbers demonstrates that the majority of businesses in Scotland manage sea lice to much lower levels than those required by current policy. Analysis for the years 2020-2021 indicates that if the intervention level were brought down from 6 to 4 sea lice per fish, only two additional enforcement notices would have been issued by FHI. This affords me the opportunity to take a reasoned and pragmatic approach to advancing this commitment at a time of significant aquaculture policy development.

### Progress on implementing Professor Griggs' review of Aquaculture

We remain committed to our regulatory review of aquaculture, which continues following the publication of Professor Griggs' independent review and is focused on ensuring that the consenting framework is streamlined, effective and transparent.

I established and chair the new Scottish Aquaculture Council which has met three times to date and will continue to meet regularly to help deliver the next steps of the regulatory review and ensure twin track progress across all government commitments relevant to aquaculture.

In parallel, a new Consenting Task Group has been formed to identify, pilot and review new measures to achieve improvements in aquaculture consenting processes, while maintaining high environmental standards. A key focus is on placing an enhanced emphasis on multilateral pre application consultation in line with the regulatory review report. This process will also seek to ensure improved transparency and effective and meaningful opportunities for engagement by all interested parties, whilst streamlining the administration of the consenting system.

I also asked the Scottish Science Advisory Council (SSAC) to consider the use of science in aquaculture consenting to help ensure that changes we progress build trust in evidence based decision making. I am pleased to report that the SSAC have now published their report: [SSAC Report - Use of Science and Evidence in Aquaculture Consenting and the Sustainable Development of Scottish Aquaculture | The Scottish Science Advisory Council](#). I want to thank Professor Maggie Gill and the SSAC for their time and effort in producing this detailed piece of work on an incredibly important issue. Consideration will now be given to the report findings and any next steps arising from those.

### Other Aquaculture Policy Related Developments

I intend to publish the Scottish Government's Vision for Sustainable Aquaculture shortly and will of course, provide members with a copy.

On 24 April 2023 the Scottish Government began a [consultation on the implementation and business impact of the new Environmental Quality Standard for emamectin benzoate](#), recommended by the UK Technical Advisory Group.

Lastly, I would like to highlight that following a root and branch review by Crown Estate Scotland, changes to the aquaculture seabed lease fees will be implemented this year. For salmon farming, the changes are being phased, with all existing and new lease agreements charged at 1% notional turnover. From January 2026, a 1.5% rate will be implemented. These changes mean that aquaculture's contribution will increase from approximately £5m to £10m from this year, with 100% of net revenues from Scottish Crown Estate marine assets within 12 nautical miles currently allocated to coastal local authorities for community benefit.

I hope that this update is helpful, and I look forward to meeting with you on 10 May.

Yours sincerely,



**MAIRI GOUGEON**