

The Town and Country Planning (Marine Fish Farming) (Scotland) Amendment Order 2025

Letter from Fisheries Management Scotland

While we do not object in principle to the extension of the planning zone, we cannot support the approval of this order at this stage. We require further information and assurance regarding how consenting will function within this expanded zone. Specifically, we would like clarification on the following points:

- 1. Environmental Impact Assessments (EIA):** The consultation implies that, environmental considerations for developments in the extended zone will be assessed through EIAs. However, we believe that EIAs have not adequately addressed the cumulative impact of sea lice on the environment, particularly concerning wild salmonids. We are concerned that this approach will be insufficient in the extended zone. We would like to see a commitment that the Scottish Environment Protection Agency (SEPA) would have regulatory remit over farms beyond 3 nautical miles whose sea lice dispersal contributes to sea lice loading within Wild Salmon Protection Zones (and the future equivalent for sea trout), ensuring that the environmental control for sea lice remains consistent with farms within the 3 nautical mile limit under SEPA's sea lice regulatory framework.
- 2. Lack of Supporting Documentation:** More generally, we are concerned about the absence of detailed information or supporting documentation regarding how the consenting process will work in practice under this order. This lack of clarity makes it difficult for stakeholders to properly assess the potential benefits or drawbacks. We strongly urge that any future amendments to the consenting process be presented and considered in a holistic manner to ensure that stakeholders can make an informed representation.
- 3. Complexity of the Consenting Regime:** Finally, without the necessary context, this order seems to further complicate an already complex consenting regime for fish farming. It appears there could be the potential for two separate consenting processes: one for farms within 3 nautical miles, and another for those beyond. This could create confusion and regulatory challenges.

If this order is passed, we believe that an incentive scheme should be created, which supports fish farmers to relocate farms identified as being high risk under SEPA's sea lice regulatory framework to suitable locations that do not have sea lice connectivity with Wild Salmon Protection Zones (and the future equivalent for sea trout).

In summary, we believe more information is needed to fully evaluate the implications of this order, particularly regarding the assessment of impacts on wild salmonids, regulatory clarity, and the potential for regulatory overlap.

