Dear Graham,

**ECCLR Committee inquiry into the environmental impacts of salmon farming**

As you will be aware, the Environment, Climate Change and Land Reform (ECCLR) Committee has been carrying out an inquiry into the environmental impacts of salmon farming and has heard from your colleagues in Marine Scotland, both in person and via written submissions.

The ECCLR Committee is reporting to the Rural Economy and Connectivity (REC) Committee to inform that Committee’s wider inquiry into the aquaculture industry. I am writing regarding issues on which the Committee is still unclear with a view to providing the REC Committee with further detail to inform its work.

The Committee is unclear as to the process for setting the “trigger levels” for the reporting of and action associated with sea lice levels within fish farms. In evidence to the Committee, your colleague Rob Raynard said the basis for setting the trigger levels was not published but that “As a result of the analysis that we have done of the industry data, we have a Scottish model, which we are about to publish”. The Committee requests a copy of this analysis and the Scottish model.

Secondly, the Committee has several queries regarding licencing of fish farms by Marine Scotland. On behalf of the Committee, I would be grateful if you could provide detail on the following:

- How, in practice, Marine Scotland Licencing interacts with the statutory consultees (Scottish Environment Protection Agency, Scottish Natural Heritage, Fisheries Management Scotland and the District Salmon Fisheries Board) in decisions to grant licences;

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• How it takes account of the representations of those organisations and if, and how often, decisions are taken to grant licences, contrary to the advice of these agencies;
• What triggers intervention from Marine Scotland Licencing in the operation of a fish farm, and what and how information flows influence a decision to undertake an investigation;
• Whether a licence has ever been refused or revoked based on environmental concerns (please provide details of the cases)
• Why licences are granted in perpetuity;
• Your views on the merits of granting licences for a limited time period with fixed conditions and examples of where this might be practical.

The Committee is aware of the proposal to remove consideration of potential wild salmonid impacts from the planning system. The Committee would welcome further information on that separate and “more appropriate” regulatory process, including how it would engage with the planning process and how communities and interested individuals and groups could engage in this process.

The Committee also wishes to understand whether you consider Marine Scotland currently has the capacity, expertise or access to the necessary data to undertake full consideration of potential wild salmonoid impacts, if this role were to be assigned to Marine Scotland, as part of the planning and consenting system.

The Committee is interested to understand how widely technical mitigations, including the development of RAS and the proactive implementation of management zones and controls on movements of fish to contain disease outbreaks or limit their spread, have been adopted across the sector and the resulting impact of this.

The Committee would appreciate a timely response in order to ensure this information is of maximum value to our counterpart Committee. I therefore request a response by 28 March 2018.

I look forward to hearing from you.

Yours sincerely,

Graeme Dey MSP
Convener
Environment, Climate Change and Land Reform Committee