



REDACTED

SEPA
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23rd November 2023

Dear **REDACTED**

SEPA's Sea Lice Risk Framework (SLRF) – sector views following meeting held in Perth 17th November.

Thank you for meeting with Managing Directors, senior sector representatives and Salmon Scotland to discuss SEPA's current thinking on SLRF. The sector remains committed to work collaboratively with SEPA and Marine Directorate in developing a robust, properly constructed, and validated model which assesses the potential risk that salmon farms might pose to wild salmonid populations.

However, we are very disappointed at how the 17th November meeting was conducted given the importance of SLRF to our sector. Sector representatives of businesses directly affected by the proposed SLRF would have welcomed papers in advance to facilitate a proper, informed discussion.

In meetings with SEPA, Marine Directorate and sector modellers, it has become clear that the development of the models within SLRF will take c. 4-5 years. As part of our consultation response, we reiterated the sectors offer to work collaboratively with SEPA and Marine Directorate to develop a robust model and subsequently sought a meeting with you and senior SEPA officials to discuss this offer in more detail.

Unfortunately, we were not afforded the opportunity to meet, and instead SEPA hosted two engagement sessions on 17th November, which fell significantly short of the standards expected of a regulator disseminating information to businesses. During the meeting, a detailed synopsis of SEPA's current thinking for SLRF was provided verbally by SEPA executives delivered at pace in a 30 minute period without any on-screen or handout supporting material. This included significant additional requirements that went beyond those set out in SEPAs consultation.

Sector representatives were expected to listen, digest information, take extensive notes and then provide feedback to SEPA. This was not business like or appropriate. Further, it remains extremely difficult to

provide detailed feedback on a proposed regulatory framework, when a full and detailed regulatory and business impact assessment (BRIA) has not been provided. We have repeatedly raised this point.

From the information provided it is clear there is still a significant amount of work required before SLRF can be properly implemented. Instead of providing clarity to businesses, the 17th November meeting created more uncertainty.

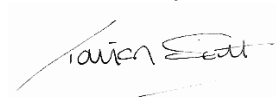
Taken objectively it is clear the framework is not at the stage where it can be implemented for the regulation of fish farms. SEPA are proposing to implement a framework before the required models, regulatory controls, protocols and guidance documentation have been established and published. This is unacceptable. It is also apparent that there is no governance structure in place for the further development of the framework. This is necessary to ensure proper scrutiny of the proposals and to ensure adequate peer review of both the science used within the framework, and the overall approach. The governance should be led by UK-focused, independent experts, and in that regard we note that there is ongoing UK-based research to better understand the impacts on wild salmonids, including ongoing research by CEFAS. We argue that it is more appropriate to base the SLRF on science, data and evidence from the UK, rather than SEPAs current approach, which appears to rely heavily on information from Norway. There are fundamental differences in the environment, wild salmonid biology and fish farming sector between Norway and Scotland.

The approach taken by SEPA and Marine Directorate has been rushed to meet political rather than scientifically and evidence based objectives. We consider there have been significant failings in the process to develop this framework.

I refer you to my letter to Cabinet Secretaries Gougeon and McAllan offering an approach based on a MoU (25th April). Their reply supported this positive suggestion. Again, we reiterate our offer to work with SEPA and Marine Directorate, in developing a robust, properly validated model that can be used to support farm consenting decisions. However, further development of the model and framework must take place, and conclude, before implementation.

Given the seriousness of this issue and the worrying step backwards that was the November 17th meeting, **I would request that this letter is tabled to the SEPA Board when it meets to discuss SLRF implementation on 28th November.** Could you please confirm that will happen so that I may inform my members. Salmon Scotland plan to attend the Board meeting.

Yours sincerely,



Tavish Scott
CEO Salmon Scotland