

**Pre-oral evidence comment by Salmon and Trout Conservation Scotland
8 March 2018**

This is a short note, hopefully to assist the Committee in advance of my giving evidence on March 14th on behalf of Salmon and Trout Conservation Scotland. I am sure you will appreciate the limits to communicating great detail within an oral evidence session, so I hope you will excuse this.

This relates to a point made in oral evidence to the REC Committee on 7th March by Professor James Bron of the Institute of Aquaculture at the University of Stirling.

He stated that:

“mostly sea lice are under control in Scotland and as I said if you look at the data that has been produced there has been no rise in sea lice, so I think there is an impression that there has been a sort of skyrocketing of sea louse numbers, but actually if you look at the average that’s remained relatively static there”.

However, as farm-specific sea lice data is not publicly available, it is not clear what the basis can be for Professor Bron’s statement.

Note that on publication of farm-specific data, the ECCLR Report, at para 58 stated:
“The Committee believes the efforts of the industry have proven to be largely insufficient to address lice issues. The Committee welcomes the announcement by the SSPO that sea lice data will be published on a farm by farm basis. For that data to be most useful the Committee considers there should be no unreasonable delay in its publication, The industry should be required to publish it in real time. Data should be published in a consistent and comparable basis and should include numbers of fish and action taken in response. This information would advance the science and solutions available to the industry. The industry should also be required to publish consistent and comparable weekly historic data sets on sea lice figures on a farm by farm basis from the time records are available. There should be no delay in the industry publishing this information so this should initially be published on a voluntary basis by the end of April 2018”

What we do know, from the output of Freedom of Information requests made by S&TCS to the Fish Health Inspectorate – at <https://beta.gov.scot/publications/foi-17-02315-review/> - is that the current sea lice figures on fish farms in Scotland are not encouraging.

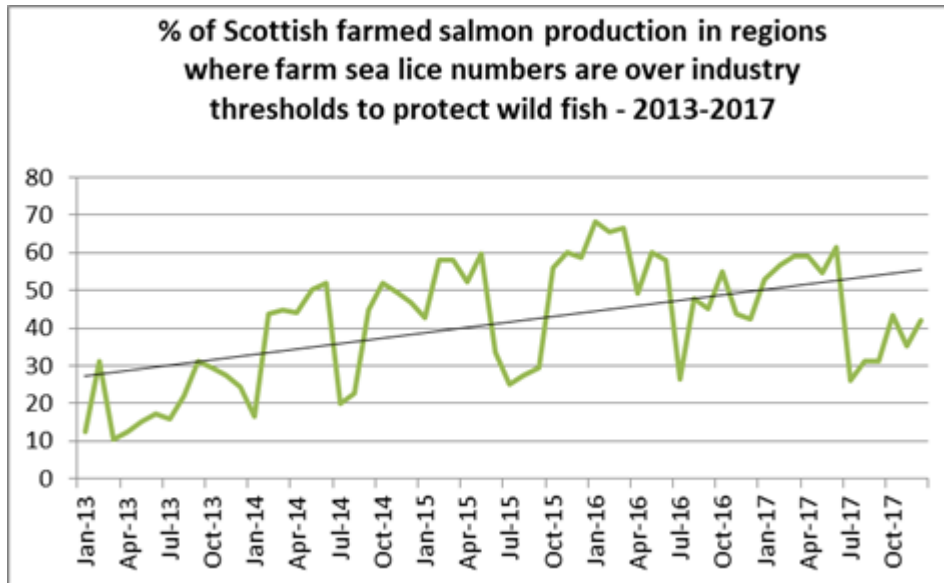
Over the 14 months to December 2017, 81 salmon farms have gone over the 3 or 8 adult female sea lice per farmed fish trigger levels, which were announced by the Scottish Government at NASCO in 2016, but only one Enforcement Notice has been issued so far, which required nothing that the industry’s own Code of Good Practice did not already, in theory, require of the farmer, or that an ordinary inspection or enhanced sea lice inspection, as already operated by the Fish Health Inspectorate under the 2008 Guidance, would not have addressed.

See <https://www.salmon-trout.org/wp-content/uploads/2017/11/NewLiceBreachingList.pdf> for the full list of farms, also appended to this note. See also S&TCS’ critique of the Scottish Government’s 2016 sea lice management policy for Scottish salmon farming <https://www.salmon-trout.org/wp-content/uploads/2018/02/A-critique-of-the-Scottish-Government%E2%80%99s-new-sea-lice-management-policy-for-Scottish-salmon-farming.pdf>

In addition, aggregated sea lice data (in each of 30 regions) has been published by the SSPO in Fish Health Management reports since 2013 (on a three monthly in-arrears basis). Analysis of this data, as against the CoGP sea lice thresholds for treatment (0.5 and

1 adult female lice per fish), the proportion of the industry, as given in the SSPO reports, that is in regions over CoGP threshold shows a cyclical pattern and, between 2015 and 2017 has ranged between 26% and 68%.

Note that in 2013 and 2014, that range was 10% to 52%, so the data shows that the sea lice issue has got worse.



Note also that the ECCLR Committee Report stated, at para 57, that *“the Committee considers there should be a mandatory requirement to keep sea lice levels within those identified in the Code of Good Practice”*.

As the graph above shows, the Scottish industry is a very long way from that being delivered.

In its report, SAMS also noted (at para 2.1.4) that *“The main treatment methods used in Scotland are experiencing reduced efficacy in dealing with sea lice on farms. New techniques are being applied, although the long-term success of these is uncertain. The legislative and voluntary frameworks that underpin the management of lice levels on farms are not transparent. They appear neither to be succeeding in controlling sea lice, nor capable of addressing the environmental effects of the lice”*.

In conclusion, what published data there is does not support Professor Bron’s evidence that *“mostly sea lice are under control in Scotland”*.

Guy Linley-Adams, Salmon and Trout Conservation Scotland.