



Edward Mountain MSP  
Convenor  
Rural Economy and Connectivity Committee

3 May 2018

Dear Convenor

### **Publication of sea lice data**

Salmon and Trout Conservation Scotland (S&TC Scotland) is dismayed that this week's publication by the salmon farming industry of sea lice data for January 2018 on an individual farm basis, as referred to in the SSPO's Chief Executive's letter to you of April 30, falls far short of what the Environment Climate Change and Land Reform Committee's Report in March on the Environmental Impacts of Salmon Farming required of the industry.

The ECCLR Committee's Report was clear regarding what was needed from the industry (at para 58):

**"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."**

It appears that the SSPO has decided that it will only publish data three months in arrears. S&TC Scotland fully agrees with ECCLR that such a time lag for the release of individual farm sea lice data is unacceptable and unwarranted. There is no logical reason why the delay should be any more than a week or two.

Nor does it appear that the SSPO will publish any historic data as the ECCLR Committee required.

As to what the January 2018 data shows, it indicates that there are still major problems with sea lice control. Indeed 31 per cent of farms (a total of 39 out of 126 that were stocked for the whole of January) were above the Code of Good Practice threshold – in some cases seven times over.

The ECCLR Committee's Report (at para 57) also considered that **"there should be a mandatory requirement to keep sea lice levels within those identified in the Code of Good Practice"**, so the data shows that the industry still has a very long way to go.

Further it seems that this latest data may be somewhat misleading and in effect be an understatement of the lice problem. According to the SSPO, eight farms fallowed during January, following the completion of harvesting. However, it is not clear when in January these farms fallowed. Some may well have completed harvesting in late January, having been considerably over the CoGP lice level for most of the month, but, because they eventually "fallowed in January", their lice numbers are excluded from the published SSPO data.

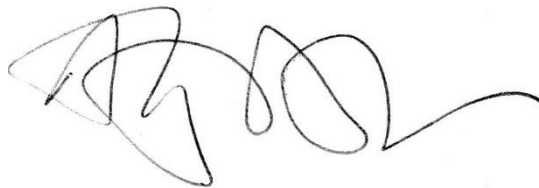
It is also noteworthy that the marine fish farms of Dawnfresh and Kames are missing completely from the SSPO's data.

Overall, the SSPO's data shows exactly why a statutory system is required, by regulation, to secure the publication of what the ECCLR Committee recommended.

As S&TC Scotland has already proposed, all that is required to ensure the full publication of farm-specific sea lice numbers, treatment and other data, as the ECCLR Committee required, is an amendment to The Fish Farming Businesses (Record Keeping) (Scotland) Order 2008, requiring proactive publication of all relevant records which are already required to be kept by fish farmers (though not published) under the existing 2008 Order.

S&TC Scotland would be happy to assist your Committee further in this vein. I am writing in similar terms to your ECCLR Committee counterpart.

Yours sincerely

A handwritten signature in black ink, appearing to read 'AGS', with a long horizontal flourish extending to the right.

Andrew Graham-Stewart

Director – Salmon and Trout Conservation Scotland