

12th June 2018

Graeme Dey MSP
Convener
Environment, Climate Change and Land Reform Committee
Room T3.40
The Scottish Parliament
Edinburgh EH99 1SP

Graeme.Dey.msp@parliament.scot; ecclr.committee@parliament.scot

Edward Mountain MSP
Convener
Rural Economy and Connectivity Committee
Room T3.40
The Scottish Parliament
Edinburgh EH99 1SP

Edward.Mountain.msp@parliament.scot; rec.committee@parliament.scot

Dear Convenors

Fish farming and transparency over sea lice data

Salmon & Trout Conservation Scotland (S&TCS) welcomed the recommendations of the ECCLR Committee that both current and historic sea lice and sea lice treatment data, on a farm specific basis, should be published by April 2018.

We note the letter sent by Mr Dey to the SSPO on 1st June 2018 and, with great disappointment, the SSPO's response of 6th June 2018, which largely avoids the ECCLR's recommendations. Regrettably, there appears to be a clear intent from the industry not to publish the data and largely to ignore the unanimous proposals of the ECCLR Committee. (Both letters are attached for ease of reference).

As both Committees have heard, it is vital that both current (in real time) and historic farm-specific sea lice numbers and treatment records are available. For example, that data is required to allow consultees, both statutory and public, to contribute effectively to planning application consultations, which currently have to try to address wild fish interactions, as both Committees have heard from Mark Harvey of Highland Council. More generally, it is needed to allow all parties to help guide the whole industry to the sustainable future that the ECCLR Committee has already identified.

Both Committees have also seen that what the ECCLR has asked for is entirely deliverable, and indeed happens now for the Norwegian industry. There is nothing unduly onerous in what the ECCLR Committee has requested.

It seems therefore that Scottish Government is left with only one option and must now legislate to ensure that the data, both current (in real time) and historic, is in the public domain. The SSPO's response to you means that the only option left is the legislative route,

Second Floor Offices, 12 Castle Street, Hereford HR1 2NL
Telephone: 01432 379093 Mobile: 07837 881219
guy@linley-adams.co.uk
www.linley-adams.co.uk

and we would urge you to recommend that the Record Keeping Order 2008 is amended, as we have previously suggested, to ensure that both current and historic sea lice and sea lice treatment data, on a farm specific basis, and that future data is published in as close as possible to real-time.

S&TCS remains committed to working with the Scottish Government to resolve the wild fish interaction problems being experienced in Scotland, but the attitude now shown by the industry in the face of your Committee's thorough report, makes that extremely difficult. This matter needs to be resolved rapidly if progress is to be made.

We look forward to the report of the REC Committee after the summer recess.

Yours sincerely

Guy Linley-Adams
Solicitor