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Enclosure 01 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Sent: Friday, March 10, 2023 4:37 PM

To: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>

Cc: Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@gov.scot>; BTA - [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@britishtrout.co.uk>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@btinternet.com>; [REDACTED – Regulation 11(2)]@fishwiselimited.co.uk; [REDACTED – Regulation 11(2)]@argyllaquaculture.co.uk; [REDACTED – Regulation 11(2)]@fishuk.net; [REDACTED – Regulation 11(2)]@yahoo.co.uk; [REDACTED – Regulation 11(2)]@shetlandfishermen.com; Tavish Scott <tavish@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>; [REDACTED – Regulation 11(2)] ([REDACTED – Regulation 11(2)]) <[REDACTED – Regulation 11(2)]@gov.scot>; [REDACTED – Regulation 11(2)] ([REDACTED – Regulation 11(2)]) <[REDACTED – Regulation 11(2)]@gov.scot>

Subject: RE: URGENT / IMPORTANT: Request for extension to deadline for HPMa consultation

Hi [REDACTED – Regulation 11(2)],

Thanks for this. Really appreciate the quick turn around and decision.

I hope you have a good weekend.

[REDACTED – Regulation 11(2)]

From: [REDACTED – Regulation 11(2)]@gov.scot <[REDACTED – Regulation 11(2)]@gov.scot>

Sent: 10 March 2023 16:19

To: [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@gov.scot>

Cc: Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@gov.scot>; BTA - [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@britishtrout.co.uk>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@btinternet.com>; [REDACTED – Regulation 11(2)]@fishwiselimited.co.uk; [REDACTED – Regulation 11(2)]@argyllaquaculture.co.uk; [REDACTED – Regulation 11(2)]@fishuk.net; [REDACTED – Regulation 11(2)]@yahoo.co.uk; [REDACTED – Regulation 11(2)]@shetlandfishermen.com; Tavish Scott <tavish@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)] <[REDACTED –

Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@gov.scot>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@gov.scot>; [REDACTED – Regulation 11(2)] ([REDACTED – Regulation 11(2)]) <[REDACTED – Regulation 11(2)]@gov.scot>; [REDACTED – Regulation 11(2)] (<[REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@gov.scot>

Subject: RE: URGENT / IMPORTANT: Request for extension to deadline for HPMa consultation

[REDACTED – Regulation 11(2)],

Thanks for getting in touch.

We will extend the deadline of the consultation by a month. We want to treat everyone equally so will change the consultation deadline on Citizen Space and send an email out to our list of stakeholders. We'll do that as soon as we can but might not happen until beginning of next week.

Best wishes

[REDACTED – Regulation 11(2)]

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Sent: 10 March 2023 12:06

To: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>

Cc: Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>; BTA - [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@britishtrout.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@btinternet.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@fishwiselimited.co.uk>; [REDACTED – Regulation 11(2)]@argyllaquaculture.co.uk; [REDACTED – Regulation 11(2)]@fishuk.net; [REDACTED – Regulation 11(2)]@yahoo.co.uk; [REDACTED – Regulation 11(2)]@shetlandfishermen.com; Tavish Scott <tavish@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Subject: URGENT / IMPORTANT: Request for extension to deadline for HPMa consultation

Importance: High

Hi [REDACTED – Regulation 11(2)],

I hope you are well.

As covered within the email title, **we wish to request an extension to the deadline for submission of responses to the HPMA consultation.** To be clear, we are not necessarily requesting this for ourselves only, as we suspect the issues noted below will also affect other sectors and individuals wishing to make a representation.

This is the first consultation relating to HPMA's, covering the underpinning policy framework and guidelines for establishing HPMA's. It is also a policy for which there will likely be significant and lasting impacts on marine sectors and individuals living close to Scotland's coastline. The outcome(s) of the consultation will be critical in providing a basis for the future development of HPMA's in Scotland. It is therefore vital that relevant sectors and stakeholders have the time to provide detailed comments to all aspects of the proposals.

Given this is the first consultation on HPMA's, there is, perhaps understandably, a very large volume of information provided in support of the consultation. There has also been important concepts and issues discussed during the various stakeholder engagement sessions. Digesting all this information, understanding the direct and indirect implications of the proposals, and then synthesising our thoughts and views into our response is not an insignificant undertaking and, in truth, we are struggling somewhat with the timeframe. However, our members, and in particular our smaller members, are finding this even more challenging, as they try to balance the need to respond thoroughly, with the need to farm their fish (and all that that entails). We suspect this is even more challenging for other sectors and stakeholders, in particular small owner operators or busy, working individuals with an interest in HPMA's.

We note that we, as a sector, are currently managing other consultations and significant policy workstreams (e.g. workstreams associated with consenting and the Griggs review, alongside other consultations such as the Veterinary Medicines Regs consultation). These must all be managed alongside "the day job" of farming fish. Again, other sectors will no doubt have their own additional "other" pressures.

We also note the current political climate, with uncertainty in terms of the next First Minister and potential changes to the Cabinet, all of which may have implications for current policy direction.

Given the above, we would like to request an extension of the deadline. Accepting the timeline Marine Scotland / Scottish Government have set for the implementation of HPMA's, **could we ask for an additional month to submit responses.** We feel this should allow sufficient time to conclude and provide our detailed responses but will also not impact your schedule for this policy area.

As you will see, I have copied this email to Annabel Turpie, Malcolm Pentland and [REDACTED – Regulation 11(2)] to keep them updated, but also to some other marine sectors, so they are aware of our request.

We look forward to hearing your consideration of this request.

Kind regards
[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 02 – Email from Salmon Scotland to the Scottish Government

[REDACTED – Out of scope]

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: 13 March 2023 10:58
To: Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>;
Nicole.paterson@sepa.org.uk
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Subject: SLRF

Morning Malcolm & Nicole,

Could I ask that we catch up for a few minutes this week on teams re SLRF? Our MDs are concerned that the ministerial meeting and now the SAC have both been pushed back to late April/May as we await a new FM and Ministers.

We also note many areas of public policy are now stalled/delayed and await the new government. I recall that SEPA's advice at the last Stirling meeting was for a SLRF consultation in April. I cannot see how that can now happen given no ministerial oversight and a controversial area of policy that we have obvious and continuing concerns about.

Therefore could we talk this through? I can be flexible in my diary all week.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



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Enclosure 03 – Letter from Salmon Scotland to the Scottish Government



3rd Floor, Venue Studios, 21 Calton Road,
Edinburgh EH8 8DL
tavish@salmonscotland.co.uk
www.salmonscotland.co.uk

14 March 2023

Humza Yousaf MSP
MSP for Glasgow Pollok

Via email: Humza.Yousaf.msp@parliament.scot, contact@humzayousaf.scot

Dear Humza,

Continuing the positive relationship between the Scottish Government and the Scottish salmon sector

It was a pleasure to meet you in the Scottish Parliament last week.

On behalf of the trade body for the Scottish Salmon sector, I wish to express our strong desire to continue the positive relationship we have with the Scottish Government. We have enjoyed an excellent working relationship with your colleague Mairi Gougeon, who has been a tireless champion for Scottish salmon. We look forward to the decision that your party will make and Parliament in appointing a new First Minister and ministers.

Scottish salmon adds £760 million-a-year to the country's economy, we are the UK's biggest food export, and the sector employs more than 2,500 people in fragile, coastal communities across rural and island Scotland, with a further 10,000 Scottish jobs dependent in the supply chain. As a key contributor to the economy, our sector recognises the importance of collaboration and dialogue with government. Therefore, I am writing about some specific policy areas where we would seek your assistance and support if you are successful in becoming the new SNP leader.

Scotland's rural housing needs

We would like to work with the Scottish Government to address the provision of adequate and affordable housing, infrastructure, and services for rural communities. Our farming companies already provide accommodation for employees and their families, but many staff simply cannot find homes near their work. We propose that £10 million of the rents paid by salmon farmers to Crown Estate Scotland be

ringfenced for direct investment in rural housing. We would be delighted to discuss this with you.

The Griggs review of aquaculture

Mairi Gougeon commissioned Prof. Russel Griggs to undertake an independent review of consenting in our sector. Prof. Griggs published his conclusions in February 2022, stating that the current set-up needs urgent change to deliver on the full potential of the blue economy. We agree. The consents and licensing process for salmon farms is unnecessarily long and complex, with several regulatory bodies involved, leading to delays, uncertainty, unnecessary cost and bureaucratic procedures. If the system is streamlined, as Prof. Griggs recommends, our sector can be more competitive on the global arena.

Our ask is for faster progress on implementing Prof. Griggs' recommendations, which have already been accepted by the Scottish Government.

Highly Protected Marine Areas

Your government is currently consulting on designating 10% of Scotland's coastal waters as HPMAs. We ask that government thoroughly consider the social and economic impacts of this policy on the sectors, industries and communities that operate in Scotland's coastal regions, as well as those that are impacted across Scotland, through the supply chain. That is yet to happen and if government does proceed with this policy, a thorough understanding of the impact on business, livelihoods and communities is essential.

SEPA & Sea Lice Risk Framework

In April 2020, the Salmon Interactions Working Group (SIWG) published recommendations which sought to drive progress on farmed and wild salmon interactions. SEPA have been designated as the lead body responsible for this policy area. We wish to ensure that SEPA, and your government, deliver on the recommendations of SIWG, which included an advisory planning framework for local authorities to use in the determination of development applications. We remain concerned that SEPA continue to exceed their brief in this area, developing a highly complex, restrictive and scientifically questionable regulatory framework, which may have a considerable impact on our sector.

I would welcome a meeting with you to discuss these issues and the future of our sector. I also extend an open invitation for you to visit any of our members' farms and the supply chain businesses who operate in every part of Scotland.

With best wishes for the remainder of the campaign.

Sincerely
[REDACTED – Regulation 11(2)]
Tavish Scott
CEO

Enclosure 04 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Sent: 25 April 2023 10:18
To: Cabinet Secretary for Rural Affairs, Land Reform and Islands
<CabSecRALRI@gov.scot>
Cc: [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Subject: Letter re SLRF from Salmon Scotland

Attached letter and supporting document from Tavish Scott, CEO of Salmon Scotland

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk

[REDACTED – Regulation 11(2)]

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Enclosure 04.1 – Email attachment



25 April 2023

Mairi Gougeon MSP
Cabinet Secretary for Rural Affairs, Land Reform and Islands & Islands
Scottish Government
St Andrews House
Edinburgh

Via email: cabsecralri@gov.scot

Dear Cabinet Secretary,

When we met with you last year, on 27 October to express our concerns over SEPA's approach to implementing a Sea Lice Risk Framework (SLRF), you kindly offered a further meeting given the seriousness of the proposed new regulation on our sector. We now understand that this meeting will take place on 3rd May and we look forward to that.

Earlier this year, senior representatives from our sector met with SEPA, Marine Scotland and Scottish Government officials, to consider the ongoing development of SEPA's SLRF (Stirling Court Hotel, 28th Feb. 2023). As an action from that meeting, our sector committed to draft a Memorandum of Understanding, which would form the basis of further engagement and collaboration, supporting the development of a properly constructed and validated approach that acknowledged the potential hazard posed by salmon farms to wild salmon populations in Scotland. Please find the draft MoU attached to this letter, for your consideration.

Our sector acknowledges that any potential hazard posed by sea lice derived from salmon farms must be appropriately considered within the farm consenting process. We are committed to working with relevant consenting bodies to establish a scientifically robust and validated approach that supports their decision-making process, where a suitable risk has been demonstrated with reliable empirical evidence. However, we are not supportive of the approach SEPA are currently taking in developing the SLRF, views that we articulated at the meeting referred to above. You will be aware that our sector has repeatedly raised significant concerns with the development of this new regulatory framework, noting serious issues with the underpinning principles and scientific justification for the framework, the science used to develop the core model, the absence of any appropriate baseline data or monitoring programme to assess the efficacy of the framework, and the lack of any socio-economic assessment of impacts on our sector and Scotland's rural

communities. More significantly, SEPA have failed, in engagement sessions and from the outputs of the model they have developed, to demonstrate that sea lice are causing a significant adverse impact on wild salmon populations. As such we can see no case for the framework that is proposed and for implementation through Controlled Activities Regulations (CAR). The current approach by SEPA, therefore, seems in conflict with the principles of Better Regulation.

We acknowledge this remains a complex issue, both politically and scientifically, but believe strongly that any new regulatory framework relating to wild / farmed interactions must be scientifically robust, validated against field data collected over a suitable timeframe, and must not be developed in haste, in response to wider political pressures. We believe the most effective and constructive way forward is to take a collaborate approach, which aligns with the original commitment of the Salmon Interactions Working Group, and which is governed by an MoU signed by our sector, SEPA and Marine Scotland.

It is important, however, to provide some context to the MoU and to the wider engagement our sector has had on this subject, in recent years:

In 2019, Marine Scotland policy officials established the Salmon Interactions Working Group (SIWG), with the goal of identifying a suite of recommendations, mutually agreed by both the salmon farming and wild fisheries sectors, that would help progress our understanding of wild / farmed interactions and that would support wild salmon conservation and management.

In total, 42 recommendations were established within the SIWG but most importantly, these recommendations were a collective suite of measures that, together, were needed to support wild salmon conservation and management: they were not individual recommendations that were to be selected from, in isolation.

Of the recommendations, SIWG stated that *“the consenting of new developments should be managed within an adaptive spatial planning model which is risk based, of suitable resolution, underpinned by best available scientific evidence, and takes into account the cumulative effect of management practices of existing developments and impacts on wild salmonid fish”*. It is this recommendation which has been used as justification for the development of the SLRF by SEPA, although it is noteworthy that SLRF was under development some time before the SIWG made its recommendations.

The recommendation and commitment made within the SIWG was, as written, focused on the development of a planning support model that would aid local authorities in their decision making around new farm developments and which would take into account existing farm management practices and the cumulative effects of other local pressures on wild fish. The SLRF that has been developed by SEPA does not meet that objective and goes far beyond what was jointly agreed by the farmed and wild fisheries sectors. We believe that SEPA have moved too quickly, to introduce an approach that is not supported by the necessary science and have produced a model which is not validated against the necessary field based, empirical evidence, and which does not align with the recommendations made by the SIWG. SEPA have continued to press on with the development of their proposed model and

have not paused and reviewed the process or model development to date. A sensible, informed review of the initial model and outputs should be undertaken as a matter of urgency before any further consultation and use of public resource.

It is our firm belief that the development of the SLRF must refocus on the original intent of the SIWG and we are committed to working with SEPA and Marine Scotland to achieve that goal. We strongly support a collaborative approach to develop a planning support model, developed over the necessary timeframe, and which is thoroughly validated and tested prior to roll out. Implementation of the decision support model can only occur once all relevant stakeholders are confident the outputs are reliable and consistent.

Once concluded, the planning support model will complete a strong series of actions that the sector committed to through the SIWG. We are disappointed that activity against the SIWG recommendations has focused primarily on actions taken by, or relating to, the farmed salmon sector. There continues to be significantly less activity to address recommendations relating to wild fisheries, and in particular there is still no clear funding mechanism to support practical conservation and fisheries management. It is our view a suitable funding mechanism is urgently needed.

In closing, we wish to reiterate our commitment to collaborate on the development of an appropriately constructed and validated risk assessment model to support local authority decision making for farm developments. The attached draft MoU details our commitment, including around the provision of data and expertise, the necessary resources to address scientific gaps through field research, and to test and validate the final model.

We look forward to your consideration of our draft MoU.

Yours sincerely,
[REDACTED – Regulation 11(2)]
Tavish Scott
CEO

DRAFT

Memorandum of Understanding

Between

The Scottish Environment Protection Agency, Marine Scotland, Salmon Scotland and the British Trout Association

1. Background

In Scotland there is a requirement to consider the potential hazard posed by sea lice from salmon farms during the consenting process for new farm developments. To date, this responsibility has rested with Local Authorities through Planning Permission determinations.

A lack of definitive evidence demonstrating and quantifying any impact from sea lice on wild Atlantic salmon has hindered local authority planners in assessing new salmon farm developments. To move this issue forward, in 2019 Marine Scotland established the Salmon Interactions Working Group (SIWG), an independently chaired working group tasked with establishing a package of mutually agreed recommendations in the area of farmed / wild interactions. Amongst its 42 recommendations, SIWG stated that “*the consenting of new developments should be managed within an adaptive spatial planning model which is risk based, of suitable resolution, underpinned by best available scientific evidence, and takes into account the cumulative effect of management practices of existing developments and impacts on wild salmonid fish*”. The delivery of this planning model will complete a strong series of actions from the farmed salmon sector, that collectively demonstrate the sectors commitment to responsible farming. Further actions relating to wild fisheries management are required to ensure the SIWG recommendations are delivered in full.

In October 2021, Scottish Government confirmed the Scottish Environment Protection Agency (SEPA) as the lead body responsible for managing the risk to wild salmonids from sea lice from fish farms. This responsibility does not remove the responsibility of local authorities to consider wild / farmed interactions during planning determinations.

2. Aims

The aims of this MoU centre on the delivery of the SIWG recommendation for the development of a spatial model to assist Local Authority planning departments.

The parties of this MoU commit to a collaborative programme of work to develop a properly validated, spatially adaptive model, which supports local authority planning departments in assessing the risk (or not) of aquaculture developments to wild salmon populations. The model will be risk based, of suitable resolution, underpinned by the best available (and only fit for purpose) scientific evidence, and takes into account the cumulative effect of management practices of existing

developments and impacts on wild salmonid fish. Where necessary, research will be commissioned to support the provision of the necessary science to develop the model. The model will be validated against field data from wild Atlantic salmon smolts, tested over several farming production cycles. Testing will be sufficient to ensure the model is validated for all locations / scenarios where it will be applied, in a regulatory context. Implementation, as a model to support regulatory decision making by Local Authorities, will only occur once the model is fully developed, tested, validated and appropriately piloted in relevant, real-world contexts, applying a degree of confidence that all parties agree to.

3. Activities covered by this MoU

3.1 Shared expertise

The parties acknowledge one another's respective scientific and practical expertise in the areas of salmonid and sea lice biology, ecology, wild / farmed interactions, fish health management, modelling, and fisheries, and acknowledge the significant added value that can be gained by taking a collaborative approach to the programme of work covered by this MoU.

The parties commit to work collaboratively to deliver the aims of this MoU. The project steering group (Section 4) will establish a framework for collaboration, which ensures all parties are contributing expertise to the development of the model.

3.2 Data

It is acknowledged that the development of a planning support model requires high quality, reliable, and robust, science and data, including data relating to wild salmon fisheries and sea lice epidemiology. Some of the data required to deliver the programme of work will reside in the public domain, but other data will be privately held, within commercial enterprises.

The parties of this MoU commit to providing the data that is agreed to be necessary to develop the planning support model. Any data provided will only be used for the explicit task of developing the planning support model and will not be used for any purpose not agreed by the data owners. It is acknowledged that some data may be considered commercially sensitive or open to misrepresentation or misuse if released into the public domain. The provision of data to support the development of the model must be backed by sound justification, agreed by all parties. Any data that is not collected through existing statutory requirements (and thus which is already in the public domain) must be destroyed upon completion of the programme of work covered by this MoU.

3.3 Research

It is acknowledged that there are gaps in our scientific understanding of wild and farmed salmon interactions, which hinder the development of a robust planning support model. The model must be developed using the most appropriate, fit for purpose, science that is relevant for use in a Scottish context, and it is agreed that where that is lacking, poorer quality science should not be supplemented.

Where necessary to meet the aims of this MoU, the parties commit to a programme of research to better understand wild and farmed interactions in relation to sea lice. This commitment covers only the science and research that is considered necessary for the development of the planning support model. The parties must agree to the value of any work in delivering the objectives of this MoU, before it is commissioned.

Support for a programme of research might include direct and in-kind support.

The planning support model will take account of other pressures on wild salmon. Consequently, it is important that research and activity around other pressures, including that covered within the Scottish Government Wild Salmon Strategy, is integrated, where relevant, into the development of the model.

3.4 Testing and validation

It is agreed that any new model that is to be used in regulatory decision-making must be suitably validated, such that its outputs can be correctly interpreted and applied in all relevant scenarios.

The parties agree that, prior to its use in regulatory decision making, the planning decision model will be tested and validated, referenced against field data from wild Atlantic salmon smolts, from relevant Scottish loch systems and geographies, and assessed over a number of farming production cycles. Testing will be sufficient to ensure the model is validated for all locations / scenarios where it will be applied, in a regulatory context. The model will only be rolled out as a decision support model once it has been properly validated and piloted.

3.5 Links to other consenting activities and research

The recommendations of the SIWG and the aims of this MoU focus on the delivery of a model to support Local Authorities in their determination of planning applications, and as such Local Authorities are an important stakeholder and end user.

The parties commit to establishing a clear mechanism to engage with Local Authorities throughout the development and testing of this planning support model, to ensure the result meets their requirements, being practical and of benefit to the consent determination process.

It is acknowledged that the framework for consenting aquaculture development in Scotland is under review at the time of signing this MoU. The parties therefore commit to establishing a clear mechanism to engage with the ongoing consenting review, through Scotland's Aquaculture Council.

Work undertaken within Scottish Government's Wild Salmon Strategy is integral to the development of the planning support model, covering wider pressures on wild salmon. The parties commit to including relevant outputs and knowledge, from activities within the Wild Salmon Strategy and other relevant research and initiatives, into the development of the planning support model.

4. Oversight

The programme of work covered by this MoU is both scientifically and politically important. It is critical the project is administered with sufficient management oversight and by those who can make decisions and commitments on behalf of the businesses or statutory bodies they represent.

The programme of work will be overseen by a suitably constituted project steering group, chaired by [To be agreed], and comprising relevant senior officials from:

- SEPA
- Marine Scotland (Science and Policy)
- Local Authority / Planning
- NatureScot
- Salmon and Trout farming representatives

The steering group will report programme delivery progress into the Scottish Aquaculture Council who will act as a resolution route for any non-agreement matters which the Steering Group cannot address.

5. Delivery / Timeframe

The delivery of the programme of work covered by this MoU requires parties to be committed over a timeframe that is mutually agreed and appropriate. The planning support model must be scientifically robust and validated against appropriate data as detailed in Section 3.4. It is expected that a substantial programme of field-based research and monitoring will be required. Such work is integral to the successful completion of the programme of work, and it must be afforded the necessary time to conclude.

Roll out of the final, validated model, should follow the agreement established with the SIWG, which focuses on new farming developments. The model should therefore only be applied after robust evidence demonstrates a new development has the potential to have a significant adverse impact on populations of wild salmon. Implementation will first focus on new farms, and thereafter, following a period of scientific review, the model may be applied to farm expansions.

6. Disclaimer

[Space included for any disclaimers that are required].

7. Signatories

SEPA

Marine Scotland

Salmon Scotland (on behalf of its members)

British Trout Association (on behalf of its members) [Noting that the BTA have not been involved in the drafting of this MoU]

Enclosure 05 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Sent: 25 April 2023 10:18
To: Cabinet Secretary for Net Zero & Just Transition <CabSecNZJT@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Subject: Letter re SLRF from Salmon Scotland

Attached letter and supporting document from Tavish Scott, CEO of Salmon Scotland

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk

[REDACTED – Regulation 11(2)]

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Enclosure 05.1 – Email attachment



25 April 2023

Mairi McAllan MSP
Cabinet Secretary for Net Zero and Just Transition
Scottish Government
St Andrews House
Edinburgh

Via email: cabsecnzjt@gov.scot

Dear Cabinet Secretary,

When we met with you last year, on 27 October to express our concerns over SEPA's approach to implementing a Sea Lice Risk Framework (SLRF), you kindly offered a further meeting given the seriousness of the proposed new regulation on our sector. We now understand that this meeting will take place on 3rd May and we look forward to that.

Earlier this year, senior representatives from our sector met with SEPA, Marine Scotland and Scottish Government officials, to consider the ongoing development of SEPA's SLRF (Stirling Court Hotel, 28th Feb. 2023). As an action from that meeting, our sector committed to draft a Memorandum of Understanding, which would form the basis of further engagement and collaboration, supporting the development of a properly constructed and validated approach that acknowledged the potential hazard posed by salmon farms to wild salmon populations in Scotland. Please find the draft MoU attached to this letter, for your consideration.

Our sector acknowledges that any potential hazard posed by sea lice derived from salmon farms must be appropriately considered within the farm consenting process. We are committed to working with relevant consenting bodies to establish a scientifically robust and validated approach that supports their decision-making process, where a suitable risk has been demonstrated with reliable empirical evidence. However, we are not supportive of the approach SEPA are currently taking in developing the SLRF, views that we articulated at the meeting referred to above. You will be aware that our sector has repeatedly raised significant concerns with the development of this new regulatory framework, noting serious issues with the underpinning principles and scientific justification for the framework, the science used to develop the core model, the absence of any appropriate baseline data or monitoring programme to assess the efficacy of the framework, and the lack of any socio-economic assessment of impacts on our sector and Scotland's rural

communities. More significantly, SEPA have failed, in engagement sessions and from the outputs of the model they have developed, to demonstrate that sea lice are causing a significant adverse impact on wild salmon populations. As such we can see no case for the framework that is proposed and for implementation through Controlled Activities Regulations (CAR). The current approach by SEPA, therefore, seems in conflict with the principles of Better Regulation.

We acknowledge this remains a complex issue, both politically and scientifically, but believe strongly that any new regulatory framework relating to wild / farmed interactions must be scientifically robust, validated against field data collected over a suitable timeframe, and must not be developed in haste, in response to wider political pressures. We believe the most effective and constructive way forward is to take a collaborate approach, which aligns with the original commitment of the Salmon

Interactions Working Group, and which is governed by an MoU signed by our sector, SEPA and Marine Scotland.

It is important, however, to provide some context to the MoU and to the wider engagement our sector has had on this subject, in recent years:

In 2019, Marine Scotland policy officials established the Salmon Interactions Working Group (SIWG), with the goal of identifying a suite of recommendations, mutually agreed by both the salmon farming and wild fisheries sectors, that would help progress our understanding of wild / farmed interactions and that would support wild salmon conservation and management.

In total, 42 recommendations were established within the SIWG but most importantly, these recommendations were a collective suite of measures that, together, were needed to support wild salmon conservation and management: they were not individual recommendations that were to be selected from, in isolation.

Of the recommendations, SIWG stated that *“the consenting of new developments should be managed within an adaptive spatial planning model which is risk based, of suitable resolution, underpinned by best available scientific evidence, and takes into account the cumulative effect of management practices of existing developments and impacts on wild salmonid fish”*. It is this recommendation which has been used as justification for the development of the SLRF by SEPA, although it is noteworthy that SLRF was under development some time before the SIWG made its recommendations.

The recommendation and commitment made within the SIWG was, as written, focused on the development of a planning support model that would aid local authorities in their decision making around new farm developments and which would take into account existing farm management practices and the cumulative effects of other local pressures on wild fish. The SLRF that has been developed by SEPA does not meet that objective and goes far beyond what was jointly agreed by the farmed and wild fisheries sectors. We believe that SEPA have moved too quickly, to introduce an approach that is not supported by the necessary science and have produced a model which is not validated against the necessary field based, empirical

evidence, and which does not align with the recommendations made by the SIWG. SEPA have continued to press on with the development of their proposed model and have not paused and reviewed the process or model development to date. A sensible, informed review of the initial model and outputs should be undertaken as a matter of urgency before any further consultation and use of public resource.

It is our firm belief that the development of the SLRF must refocus on the original intent of the SIWG and we are committed to working with SEPA and Marine Scotland to achieve that goal. We strongly support a collaborative approach to develop a planning support model, developed over the necessary timeframe, and which is thoroughly validated and tested prior to roll out. Implementation of the decision support model can only occur once all relevant stakeholders are confident the outputs are reliable and consistent.

Once concluded, the planning support model will complete a strong series of actions that the sector committed to through the SIWG. We are disappointed that activity against the SIWG recommendations has focused primarily on actions taken by, or relating to, the farmed salmon sector. There continues to be significantly less activity to address recommendations relating to wild fisheries, and in particular there is still no clear funding mechanism to support practical conservation and fisheries management. It is our view a suitable funding mechanism is urgently needed.

In closing, we wish to reiterate our commitment to collaborate on the development of an appropriately constructed and validated risk assessment model to support local authority decision making for farm developments. The attached draft MoU details our commitment, including around the provision of data and expertise, the necessary resources to address scientific gaps through field research, and to test and validate the final model.

We look forward to your consideration of our draft MoU.

Yours sincerely,
[REDACTED – Regulation 11(2)]
Tavish Scott
CEO

Enclosure 05.2 – Email attachment

[REDACTED – Duplicate of Enclosure 04.2]

Enclosure 06 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Sent: 25 April 2023 10:20

To: Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>

Subject: Letters sent to Cabinet Secretaries

Malcolm, good morning

Tavish has asked to me send you copies of letters and draft MOU which we have today sent to Cabinet Secretaries Gougeon and McAllan

Regards

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk

[REDACTED – Regulation 11(2)]

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Enclosure 06.1 – Email attachment

[REDACTED – Duplicate of Enclosure 05.1]

Enclosure 06.2 – Email attachment

[REDACTED – Duplicate of Enclosure 04.1]

Enclosure 06.3 – Email attachment

[REDACTED – Duplicate of Enclosure 04.2]

Enclosure 07 – Letter from the Scottish Government to Salmon Scotland



Scottish Government
Riaghaltas na h-Alba
gov.scot

Cabinet Secretary for Rural Affairs, Land Reform and Islands

Rùnaire a' Chaibineit airson Chùisean Dùthchail, Ath-
leasachadh Fearainn agus Eileanan
Mairi Gougeon MSP/BPA

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED – Regulation 11(2)]

REDACTED – Regulation 11(2)]@salmonscotland.co.uk

Our Reference: 202300353718

Your Reference: Letter re SLRF from Salmon Scotland

22 May 2023

Dear Tavish,

Thank you for your letter of 25 April to me and Mairi McAllan MSP, Cabinet Secretary for Net Zero and Just Transition. I am also responding on Ms. McAllan's behalf.

I read your letter and accompanying draft Memorandum of Understanding with interest. I look forward to discussing these at our meeting on Tuesday 30 May.

Yours sincerely

[REDACTED – Regulation 11(2)]

MAIRI GOUGEON

Enclosure 08 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk> **On Behalf Of** CEO

Sent: 02 June 2023 13:41

To: Cabinet Secretary for Rural Affairs, Land Reform and Islands
<CabSecRALRI@gov.scot>

Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Subject: Letter from Tavish Scott, CEO Salmon Scotland

Attached letter from Tavish Scott for the attention of Cabinet Secretary Gougeon

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk

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Enclosure 08.1 – Email attachment



2 June 2023

Mairi Gougeon MSP
Cabinet Secretary for Rural Affairs, Land Reform and Islands & Islands
Scottish Government
St Andrews House
Edinburgh

Via email: cabsecralri@gov.scot

Dear Cabinet Secretary,

SEPA & Sea Lice Risk Framework

Thank you for the meeting on Tuesday 30th May in St Andrews House, with Jim Gallagher and Colin Blair. I wanted to follow up with our sector's proposal on a constructive way forward.

We understand the Ministerial direction to introduce a framework. To ensure the proposed regulatory framework is appropriate, we believe there must be a robust, properly validated model and associated assessment of the impacts on businesses arising from the proposed framework. These are critical requirements before any framework can be rolled out across the sector.

Therefore, we propose the most appropriate way forward is to work collaboratively in developing a robust, validated model, but critically, which is piloted through field testing prior to wider roll out across the sector. Undertaking a pilot will allow any necessary refinement of the model but will also allow a parallel workstream to assess the business and regulatory impacts of the proposed framework. The draft MoU, previously proposed by our sector, provides a mechanism to deliver this workstream. We commit to work with SEPA and Marine Scotland Science, to revise the MoU to cover such a programme of work, including with the provision of data, resource, and further research.

We ask for your support and commitment to this proposal. The Salmon Scotland Board are committed to this approach, and will provide the necessary sector wide resource to support SEPA in delivering a robust, properly validated model, and to piloting the model through field testing.

We look forward to your consideration of this proposal.

Yours sincerely,
[REDACTED – Regulation 11(2)]
Tavish Scott
CEO

3rd Floor, Venue Studios, 21 Calton Road,
Edinburgh EH8 8DL
tavish@salmonscotland.co.uk
[www. salmonscotland.co.uk](http://www.salmonscotland.co.uk)

Enclosure 09 – Email from Salmon Scotland to the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Friday, June 2, 2023 1:19 PM
To: Pentland MK (Malcolm) <Malcolm.Pentland@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Subject: Cab Sec letter

Afternoon Annabel and Malcolm,

We have sent this into Cab Sec's office today to seek a constructive way forward on SLRF. The model underpinning the framework has to be appropriate and this is, as we've previously sought to explain, the way to achieve a better outcome. The sector would be grateful for a positive response.

I am sending this to Nicole Paterson too and asking for her to discuss in a positive manner.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 09.1 – Email attachment

[REDACTED – Duplicate of Enclosure 08.1]

Enclosure 10 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Sent: Thursday, June 15, 2023 2:22 PM

To: Minister for Housing <MinisterHousing@gov.scot>

Subject: Salmon Scotland

Good Afternoon,

Please see letter attached from Tavish Scott.

Many Thanks,

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk



From Monday 1st November the SSPO changed its name to [Salmon SCOTLAND](https://www.salmonscotland.co.uk)

www.salmonscotland.co.uk

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Enclosure 10.1 – Email attachment



12 June 2023

Paul McLennan MSP
Minister for Housing
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG

Via email: ministerhousing@gov.scot

Dear Paul,

On behalf of Salmon Scotland, I wish to take this opportunity to extend our congratulations on your recent appointment as Minister for Housing.

I am writing to request a meeting to discuss the vitally important issue of rural housing for our members, their employees and families, and Scotland's remote communities.

Scottish salmon is an extraordinary global success story that we can all be immensely proud of, supporting thousands of jobs and contributing hundreds of millions of pounds to the Scottish economy. Scottish salmon, grown sustainably in the cold waters off our west coast, is recognised as the best in the world – which is why it is in such high demand at home and abroad. Scottish salmon was the UK's biggest food export in 2022, according to official HMRC figures. Our farms directly employ more than 2,500 people in fragile, coastal communities in rural Scotland, with a further 10,000 Scottish jobs dependent on the sector. We made an economic contribution of £760 million in Gross Value Added (GVA) in 2021, up nearly a fifth on pre-pandemic levels.

However, a lack of affordable housing is holding back the Highlands and islands. The impact of this cannot be underestimated – it means not being able to live near where you work, it separates families, and contributes to the depopulation of our island communities. In many remote parts of Scotland, salmon farms are vital to the future of local businesses and communities. That's why we are so determined to improve housing availability so that we can provide sustainable growth in the areas where we farm.

Already, our members companies are doing their bit. They have invested in providing accommodation to colleagues so that they can stay in, or move to, the area to perform their roles and contribute to the local economy all year round. Currently,

there are over 61 properties either owned or rented by our farmers, providing accommodation for more than 130 colleagues on Eday in Orkney, in Tarbert on Harris, across Sutherland and the Uists to Mull, Ullapool and Applecross. Salmon farmers also use rentals, B&Bs and hotels which contribute to the local economy all year round.

Scotland's cluttered licensing regime and planned rent hikes means that more than £20million per year is soon expected to be paid by salmon farmers to various regulators and quangos. At present, salmon farming contributes more than £5m directly to Crown Estate Scotland (CES), but this fee is set to nearly double. As you will be aware, net CES revenues are currently handed to the Scottish Government and redistributed across the country, however we believe that a greater share of aquaculture contributions should be ringfenced to support coastal communities.

As you may have seen in the media, we have been calling for reform to ensure that around £10million is reinvested in rural communities, with a particular focus on housing.

I would very much welcome a meeting to discuss the issue of rural housing. I would be happy to meet you in the Scottish Parliament or at St Andrew's House, or you would be welcome to visit one of our farms in rural Scotland to learn more about the challenges and opportunities.

Yours sincerely,
[REDACTED – Regulation 11(2)]
Tavish Scott
CEO

Enclosure 11 – Letter from the Scottish Government to Salmon Scotland



Scottish Government
Riaghaltas na h-Alba
gov.scot

Cabinet Secretary for Rural Affairs, Land Reform and Islands

Rùnaire a' Chaibineit airson Chùisean Dùthchail, Ath-
leasachadh Fearainn agus Eileanan
Mairi Gougeon MSP/BPA

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]@salmonscotland.co.uk

Our Reference: 202300361391

Your Reference: Letter from Tavish Scott, CEO Salmon Scotland

16 June 2023

Dear Tavish,

Thank you for your letter, dated 2 June 2023, following our recent meeting to discuss the Scottish Environment Protection Agency's (SEPA) development of a sea lice risk assessment framework.

I appreciate the sector's willingness to engage in a constructive way with SEPA to progress the development of the sea lice risk assessment framework and wish to reiterate my commitment, and the commitment of Ms McAllan and our officials, to helping support effective engagement between the sector and SEPA.

In relation to the pilot proposal referred to in your letter, I understand that SEPA is open to the concept of exploring a pilot of the modelling approach as a supporting component to the phased implementation of the sea lice risk assessment framework. I would, therefore, encourage you to explore this further with SEPA.

As you will be aware, SEPA published its consultation on detailed proposals, including an initial assessment of implications of the sea lice framework on 31 May. SEPA will also be holding a series of stakeholder workshops during the consultation period, and I would encourage the sector to engage in that process.

Yours sincerely

[REDACTED – Regulation 11(2)]

MAIRI GOUGEON

Enclosure 12 – Email from Salmon Scotland to the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Thursday, June 22, 2023 1:54 PM
To: Malcolm Pentland <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Subject: Regulators Liaison

Afternoon Malcolm,

Thank you for the catch up this morning. I attach a proposal on a sector-regulators liaison update that [REDACTED – Regulation 11(2)] and [REDACTED – Regulation 11(2)] have discussed. It would be highly beneficial to timetable this for late August (post Aquanor) and before Parliament resumes. Once you've had an opportunity to consider with colleagues shall the 4 of us jump on a teams call to develop the proposition.

Just to confirm that we really appreciate MS heavy lifting on the Cab Sec reply on SLRF pilot. We will see Nicole Paterson at Mowi Rosyth a week today and look forward to progressing with her. I will give you a shout thereafter on next steps.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 12.1 – Email attachment

Proposal to establish a Sector - Regulators Liaison Group.

Rationale: The consenting and operation of salmon farms is overseen by a range of statutory bodies. The Salmon farming sector believe there would be benefit in forming a Regulators Liaison Group, bringing together those organisations, in an annual forum that supports open discussion around current and upcoming issues and workstreams of strategic importance.

The proposal is to establish a forum that further supports transparency and communication between parties involved in the consenting, oversight, and operation of salmon farms and to share insight and strategic information on fish farm operations collectively with policy makers and regulators.

There are a number of existing strategic forums, such as the Scottish Aquaculture Council (SAC) and Farmed Fish Health Framework (FFHF). However updates and engagement are limited by established objectives and targeted outcomes. Currently, no forum exists which brings together all relevant regulators and senior sector representatives, at a strategic level, with the opportunity for broad, forward-looking discussion. It is our firm belief that a Regulators Liaison Group would not conflict with the remit of existing strategic groups but would be complementary.

Attending organisations / individuals: It is acknowledged that a Regulators Liaison Group will involve numerous organisations and will therefore comprise many attendees. This is unavoidable, but to ensure productivity during meetings, it is proposed that attendance is restricted to two representatives per organisation (i.e., CEO / Director / MD plus one senior representative):

- Scottish Government / Marine Directorate:
 - Policy
 - MS LOT
 - Fish Health Inspectorate
 - APHA
 - Plus, as available, the CVO & CSA
- SEPA
- NatureScot
- Crown Estate Scotland
- Local Authority Aquaculture planning group
- Salmon Scotland
- Salmon producing companies
- SAIC

Terms of Reference: It is anticipated that formal ToR will be established and agreed by all organisations. However, it is envisaged that an annual forum will include presentations and open discussion from each attending organisation, to include:

- Updates on upcoming activities, workstreams, projects, policies, consultations, other strategic / structural changes.

- Advance warning of relevant challenges, resource implications etc.
- Salmon producers will provide an overview of current and anticipated production, challenges, investment and development plans (noting commercial and competition laws will have to be respected), and areas where support might be needed.

Frequency / format: In person meetings with the first to take place in August. It is expected that meetings will require a minimum duration of 4h.

Enclosure 13 – Letter from the Scottish Government to Salmon Scotland

Minister for Housing
Ministear airson Taigheadas
Paul McLennan MSP/BPA

T : 0300 244 4000

E : scottish.ministers@gov.scot

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]@salmonscotland.co.uk

Our Reference: 202300362390

4 July 2023

Dear Mr Scott

I refer to your correspondence dated 12 June seeking to meet with the Minister for Housing to discuss rural housing.

Mr McLennan would be delighted to meet with you, please note that all engagements are subject to Ministerial business and can change at short notice.

I would be grateful if you could please contact the Minister's Diary Secretary at ministerhousing@gov.scot to make the necessary arrangements.

Yours sincerely,

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

Enclosure 14 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** Director of Environment & Forestry
Sent: Monday, November 27, 2023 9:54 AM
To: Tavish Scott <tavish@salmonscotland.co.uk>; Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by NatureScot

Tavish

Apologies for the ongoing delay in sending you a substantive response on this. I am pleased to let you know that NatureScot has recently confirmed the withdrawal of their objection to SEPA's CAR licence authorisation, based on an agreement that has been reached for an adaptive management approach to the operation of the site. The understanding of my team is that Mowi, NatureScot and SEPA are all content that this situation has therefore been resolved. If that is not your understanding of their position, please do let me know.

Kevin

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Thursday, November 23, 2023 8:51 AM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by NatureScot

Morning [REDACTED – Regulation 11(2)],

Is there any update on this as a further month has passed?

Many thanks
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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From: [REDACTED – Regulation 11(2)]@gov.scot <[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** director.enfor@gov.scot
Sent: Thursday, October 12, 2023 2:34 PM
To: Tavish Scott <tavish@salmonscotland.co.uk>; director.enfor@gov.scot
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Tavish

Appreciate you are keen to receive a substantive response. Unfortunately, I can't give a more precise timescale, but we will make sure it as soon as possible.

[REDACTED – Regulation 11(2)]

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Thursday, October 12, 2023 10:49 AM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Good morning [REDACTED – Regulation 11(2)],

Thank you. I have been on the end of "in due course" many times. Given I raised this on 1st September, could you give some indication of when we will receive a substantive reply?

Many thanks indeed.

Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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From: [REDACTED – Regulation 11(2)]@gov.scot <[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** director.enfor@gov.scot
Sent: Thursday, October 12, 2023 10:30 AM
To: Tavish Scott <tavish@salmonscotland.co.uk>; director.enfor@gov.scot
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Tavish

Sorry we haven't responded as yet. I can confirm Dave has been reassured that the issue is being actively looked into. He will revert in due course once we have additional information.

[REDACTED – Regulation 11(2)]

Environment and Forestry Directorate

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Wednesday, October 11, 2023 1:29 PM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Hi Kevin,
I wonder if you are in a position to advise on this matter.
Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Friday, September 1, 2023 11:43 AM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Fyi – shared with sponsor hub

Good morning Kevin,

Naturescot – pending Ministerial decision re Isle of Barra fish farm.

I understand from Mowi Scotland that your Cab Sec will receive Scottish Government legal advice accompanying a submission from Naturescot in the coming days regarding their objection to a SEPA CAR license for this fish farm. I am very concerned that Naturescot have not engaged with Mowi Scotland and have chosen to confine their observations to Ministers to an interpretation of environmental grounds rather than recognising the holistic position that covers socio-economic importance of this commercial business to Barra.

I would therefore be grateful if you could look into this matter and ensure Ministers are properly aware of all the factors that pertain to this and in particular the failure of Naturescot to engage, which I find very concerning. Professor Russel Griggs independent report into aquaculture regulation published in February 2022 recommended measures to halt this kind of practice from government agencies. His recommendations were of course accepted by the Cabinet Secretary for Rural Affairs.

Background –

Mowi Scotland are presently investing in our Hellisay fish farm on Barra with new pen equipment proposed and are in the process of securing the necessary regulatory permissions.

The current development comprises of twelve pens of 120 m circumference. The proposed modified development will replace the existing pens with five pens of 200 m circumference. The location of the pens will be broadly in the same position as the existing development. The existing feed barge will be retained and will remain in a similar position, located to the west of the pens. There will be no increase in the current consented maximum standing biomass of 2,150 tonnes. The site will continue to be serviced from Ardveenish, with no change in the operational vessel transit route proposed or other operational processes.

SEPA had advised they were content with the development and proposed to issue the requisite environmental permission (the CAR Permit).

NatureScot however raised an objection to this on environmental grounds (contrary to the SEPA assessment) and requested Scottish Ministers call-in the application for their own determination. The parallel planning application is now suspended pending the decision of Scottish Ministers with NatureScot refusing to engage with us until a determination on the call-in request is reached.

Should the development fail to secure the necessary permissions there is a risk that the existing farm will cease to operate. Consequently, in the event of this likelihood there are likely to be significant adverse socio-economic impacts to the Barra economy including a loss of a combined total of 22.5 FTE jobs across the community. We feel it is appropriate and relevant to bring this to the attention of the Cabinet Secretary, thus the email below. However Mowi understand that this socio-economic information is now not going to be considered in this determination.

Mowi and Salmon Scotland remain disappointed with the approach of NatureScot. Over the 10-year operational life of the fish farm Mowi have a wealth of monitoring information demonstrating there have been no significant effects on the surrounding environment. Mowi interactions with NatureScot through this process have been characterised by delayed correspondence timeline with NatureScot and an unwillingness to engage, which has ultimately led to the call-in request. Given Mowi had received a draft CAR license prior to this, any concerns raised over issuing of the CAR Permit could have been mitigated through proactive engagement with the company. However regrettably this has not been possible.

I hope this information is useful and [REDACTED – Regulation 11(2)], Mowi Scotland's [REDACTED – Regulation 11(2)] and I would be happy to discuss this further with you. I am sure you will appreciate our concern should the decision be to refuse the SEPA CAR licence.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 15 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>
Sent: Thursday, September 14, 2023 4:11 PM
To: Malcolm Pentland <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>
Cc: Tavish Scott <tavish@salmonscotland.co.uk>
Subject: SLRF

Hi Malcolm, [REDACTED – Regulation 11(2)],

I hope you are well.

We have now submitted our response to SEPA's SLRF consultation.

I have attached it here for your interest and information.

With kind regards
[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]
[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]
E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk



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Enclosure 15.1 – Email attachment

[REDACTED – Regulation 6(1)(b)]

Enclosure 16 – Email from Salmon Scotland to the Scottish Government

From: Malcolm Pentland <Malcolm.Pentland@gov.scot>
Sent: Friday, September 22, 2023 9:04 AM
To: Tavish Scott <tavish@salmonscotland.co.uk>
Subject: RE: CES

Hi Tavish

Thanks for this. I thought the discussion with Gregor was good and hopefully felt useful from your perspective.

Really helpful to see this detail on the CES housing proposal. Happy to discuss this further with you and others and it was something I touched on (briefly) in a catch up with Ronan on Wednesday.

One minor point - not to be picky but rather trying to be helpful - just to ensure accuracy, the formula for the distribution of the revenues is not an 'SG formula', it is a formula agreed by the Settlement and Distribution Group which comprises COSLA, LAs and SG.

Best wishes
Malcolm

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: 21 September 2023 16:23
To: Malcolm Pentland <Malcolm.Pentland@gov.scot>
Subject: CES

Afternoon Malcolm,

Thank you for joining the Gregor Irwin discussion this week – I am having the team pull together the latest stats in regulation and timescales re the statutory deadlines as requested.

We had a Salmon Scotland Board meeting today and Crown Estate Scotland's 2024 lease charge increases was discussed. As you know the sector currently pays circa £10m to CES some of which is distributed by formula to local authorities. I have discussed these arrangements with every local authority leader and chief executive in the Highlands & Islands. I thus want to reiterate the Salmon Scotland's Board position – that the additional income from salmon production companies in 2024 and beyond should be spent in the local authority areas where it is raised and on housing which is the pressing need.

I was asked to brief the Housing Minister on Tuesday on this and provide a brief which is a cut down version of the note that Kevin Pringle asked for. I do see this as a win for all parties – central & local government and the salmon sector. It helps us hugely with both community engagement and social license. I have discussed this

too with Ronan O'Hara most recently in Orkney with OIC, Jim Gallagher and Colin Blair.

So happy to further discuss but it would be great to get this positively over the line. The note I provided to the Housing Minister (and Kevin Pringle) is below.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]

E tavish@salmonscotland.co.uk



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Rural housing – local authorities/Crown Estate Scotland/Salmon Scotland

- Salmon production companies pay rent for the use of the seabed to the landlord – CES. This is circa £10m p.a but is due to double in 2024. This income goes into SG and is allocated to rural local authorities under a SG formula. In broad terms each of the 5 H&I local authorities do not receive all this rent back for use locally.
- Salmon Scotland and the production companies want to enhance local social license by ensuring local authorities and communities see direct benefit from the sector in addition to the standard socio-economic factors such as jobs/wages/local spend/local sponsorship. In alignment with the SG's new Aquaculture vision.
- A rural housing fund would use rents from production companies to CES to build homes in rural areas. We would suggest that the scale of the fund should be at least £10 million of the £20m the sector will pay in rent in 2024.
- Sector in discussions with CES and Orkney Islands Council to run a housing support pilot programme – the aim is to support/build new quality homes in areas of real need for key workers and local community. The program would use local development trusts embedded in local areas as the enabler.
- An initial meeting with CES & OIC (June) attended by sector MDs was positive with all parties wanted to develop the proposal.
- CES come under Marine Directorate and thus Roy Brannen's net zero section of SG.

Opportunity

Housing investment links to salmon being Scotland's No 1 food export sector, aquaculture vision/blue economy strategy/local well paid jobs etc. SG could announce a new **rural housing initiative** bringing together local and national government/landlord and the sector to deliver an exciting new way to build homes in local areas. This would be funded by rents from production companies to build homes in rural areas. ie no ask for new money.

Wider handling

Local authorities would ask about the monies they currently get from CES and spend themselves. Salmon Scotland have had initial discussions with CEO's and Leaders of local authorities (Argyll & Bute, Highland, Shetland, Orkney and Comhairle nan Eilean Siar) on rural housing need and using salmon rent through CES to support build. That would be the trade off – this new program would mean spend on desperately needed rural housing with local authorities as full partners in decision making. If the housing fund is £10 pa then there could be no difference to current LA allocations and thus any LA concerns would be allayed.

Ask

The proposed housing program needs Ministerial push. CES through CEO Ronan O'Hara has been positive and understanding. His advice is that if this approach were to be government policy/ministerial request then CES would develop that.

Next steps

A Gov minister (Housing) to convene the principal parties to a meeting to develop this pilot with a view to rolling out across the H&I.

Enclosure 17 – Email from Salmon Scotland to the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Wednesday, October 11, 2023 4:21 PM
To: DG Net Zero <DGNetZero@gov.scot>
Subject: Meeting request

Good afternoon Roy,

It does not seem that long ago that I was asking your advice on roads and rail projects.....

I was scrolling through the Government website today and have only now realised the extent of your responsibilities. Could we set up a coffee or a call?

My sector is concerned by the sheer weight of documentation that Government is pushing out at business across environment (biodiversity) and marine (Planning etc) and I wanted to provide a wider perspective. These concerns are led by our company MDs who ask about the effectiveness of Business Regulatory Impact Assessment (BRIA) procedures.

I also note carefully the FM's position on economic growth which is welcome. I've attached a briefing on the sector's economic significance to Scotland including salmon as the UK's No 1 food export.

Thus it would be good to have a discussion on this if you are interested.

With best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 18 – Email from Salmon Scotland to the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Tuesday, October 24, 2023 4:11 PM
To: Cabinet Secretary for Wellbeing Economy, Fair Work & Energy
<CabSecWEFWE@gov.scot>
Subject: RE: DFDS visit

Thanks [REDACTED – Regulation 11(2)],
Appreciate the message.
Tavish

From: [REDACTED – Regulation 11(2)]@gov.scot <[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** CabSecWEFWE@gov.scot
Sent: Tuesday, October 24, 2023 2:48 PM
To: Tavish Scott <tavish@salmonscotland.co.uk>; CabSecWEFWE@gov.scot
Cc: [REDACTED – Regulation 11(2)]@dfds.com; [REDACTED – Regulation 11(2)]@dfds.com; [REDACTED – Regulation 11(2)]@dfds.com
Subject: RE: DFDS visit

Good afternoon Mr Scott,

Many thanks for your recent correspondence to Neil Gray MSP, Cabinet Secretary for Wellbeing Economy, Fair Work and Energy, following his recent visit to DFDS.

Please see below a response from Mr Gray.

Dear Tavish,

Thank you to yourself and all at DFDS for the meeting last Thursday. It was a really useful discussion and instructive for me to hear about the complexity of the logistics involved in transporting Scottish salmon across the globe.

The Scottish Government is committed to continued support for the UK's number one food export. I look forward to further progress of the regulatory review and Ministers will remain steadfast in representing Scottish interests with the UK Government on EU Exit and matters affecting trade.

NG

Kind regards,
[REDACTED – Regulation 11(2)] ([REDACTED – Regulation 11(2)])
[REDACTED – Regulation 11(2)] | Office of the Cabinet Secretary for Wellbeing Economy, Fair Work and Energy – Neil Gray MSP
Scottish Government | St Andrew's House | Regent Road | Edinburgh | EH1 3DG |
Email: CabSecWEFWE@gov.scot

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Minister, or a note of a Ministerial meeting, must be filed appropriately by the recipient. Private Offices do not keep official records of such e-mails or attachments.

From: Tavish Scott <tavish@salmonscotland.co.uk>

Sent: Monday, October 23, 2023 12:44 PM

To: Cabinet Secretary for Wellbeing Economy, Fair Work & Energy

<CabSecWEFWE@gov.scot>

Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@dfds.com>; [REDACTED – Regulation 11(2)]@dfds.com; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@dfds.com>

Subject: DFDS visit

Neil Gray MSP

Cab Sec for Wellbeing Economy, Fair Work & Energy

Scottish Government

Dear Neil,

Thank you for visiting the DFDS hub at Larkhall last week. I appreciate, as did the DFDS leadership team, your time and interest in the logistics operation that facilitates salmon finding its way to the customer across 50 countries around the globe. I enjoyed the discussion and hope that we left you a few thoughts on the role Government plays in business success and our ability to be competitive in the international marketplace.

If there is any further information you, your private office or the wider economy team with Scottish Government need from a sector that employs 12,000 people the length and breadth of the country and is the No 1 food export to, then please have your office reach out.

We look forward to welcoming you and your Ministerial colleagues to our businesses on many more occasions.

Best wishes

Tavish

Tavish Scott

Chief Executive

M [REDACTED – Regulation 11(2)]

E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 19 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Sent: Thursday, November 2, 2023 2:11 PM

To: zzzCabinet Secretary for Net Zero & Just Transition <CabSecNZJT@gov.scot>

Cc: Cabinet Secretary for Rural Affairs, Land Reform and Islands <CabSecRALRI@gov.scot>; Director of Marine <directormarine@gov.scot>; David Signorini <David.Signorini@gov.scot>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@cookeaqua.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@bakkafrost.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>; [REDACTED – Regulation 11(2)]@scottishseafarms.com; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@zoetis.com>; [REDACTED – Regulation 11(2)]@btinternet.com

Subject: Letter from The Salmon Scotland Prescribing

Dear Ms McAllan,

Please find attached correspondence from the Salmon Scotland Prescribing Vets group, in reference to the ongoing review of the Environmental Quality Standard for Emamectin Benzoate.

To note also, I have copied Cab. Sec. Gougeon into this email for completeness, as well as the Annabel Turpie, (Director of the Marine Directorate) and David Signorini (Director of the Environment and Forestry Directorate). All members of the Prescribing Vets group are also copied here.

With kind regards

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk



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Enclosure 19.1 – Email attachment



Màiri McAllan MSP
Cabinet Secretary for Net Zero and Just Transition
Scottish Government
St Andrews House
Edinburgh

Sent via email, on behalf of the Salmon Scotland Prescribing Vets Group
2nd November 2023

Dear Ms McAllan,

Request to meet on EQS consultation

The review of the Environmental Quality Standard (EQS) for Emamectin Benzoate has been ongoing since 2016. Most recently Scottish Government undertook a consultation on implementation of a revised EQS that was previously proposed by UKTAG. We understand your policy officials are currently reviewing the consultation responses and will respond in due course.

The salmon farming sector submitted responses to the consultation, both through Salmon Scotland and via individual farming companies. The views of the veterinary profession were expressed in those responses. However, as might be expected, within any written response it is difficult to clearly articulate, in detail, the potentially significant impacts for fish health that can arise from a change in the availability of licenced veterinary medicines. There can be both direct impacts, and indirect, knockon implications, noting that the sector takes a holistic approach to fish health management: a change in access to one pillar of fish health management can have significant impacts elsewhere in our overall health management plan, and for fish health more generally.

The Salmon Scotland Prescribing Vets group (see Annex 1) would therefore like to extend an offer to meet with you and/or your policy officials, to present and discuss in more detail the potential wider fish health and veterinary implications that can arise as a result of a change in the availability of a veterinary medicine. We believe a thorough understanding of these implications is an important consideration for the ongoing consultation review process.

Members of the Prescribing Vets group would be happy to meet at a mutually convenient time, either in person or online.

We look forward to your consideration of this offer. Should you require any further information, please do not hesitate to contact me.

Yours sincerely

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)] for the Salmon Scotland Prescribing Vets Group

cc. Mairi Gougeon MSP, Cabinet Secretary for Rural Affairs, Land Reform and Islands

All members of the Salmon Scotland Prescribing Vets group

Salmon Scotland

3rd Floor, Venue Studios, 21 Calton Road,

Edinburgh EH8 8DL

enquiries@salmonscotland.co.uk

www.salmonscotland.co.uk

Annex 1: The Salmon Scotland Prescribing Vets Group

The Salmon Scotland Prescribing Vets Group is an independent group of experienced fish vets representing veterinarians operating in the Scottish farmed salmon sector. The group covers all Salmon Scotland member companies and is overseen by an independent chair. The group supports information exchange and collaborative working amongst practising vets and provides a forum through which fish vets can establish clear, independent positions on matters relevant to salmon farming. Salmon Scotland provide a secretariat function only, with no decision-making role within the group. Reference to “Salmon Scotland” in the working group name merely references the role of Salmon Scotland in supporting the administrative functions of the group.

Enclosure 20 – Email from Salmon Scotland to the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: 13 November 2023 11:46
To: Director of Marine <directormarine@gov.scot>
Cc: Malcolm Pentland <Malcolm.Pentland@gov.scot>
Subject: Aquaculture Interactions manager - Government funding

Good morning Annabel,

I attach a letter to the Directorate regarding the government's funding for this post. I simply suggest that this would be an opportune time to review especially in light of the pressures on your Budget.

Look forward to seeing you on Thursday at SAC.

Bets wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 20.1 – Email attachment



Ms. Annabel Turpie
Director, Marine Directorate
The Scottish Government
St. Andrew's House
Regent Road
Edinburgh
EH1 3DG

13th November 2023

Dear Ms. Turpie,

Request for Scottish Government and Crown Estate Scotland to review their funding of Aquaculture Interactions Manager project.

[REDACTED – Out of scope]

3. The role has centred on supporting local fisheries bodies in preparing objections to fish farm planning applications and complicating and frustrating the process of establishing Environmental Management Plans (EMPs) at a local level. To that end, it is a significant concern that the most recent iteration of the Aquaculture Interactions Manager job description² specifically includes a responsibility to *“Support for DSFBs and Fisheries Trusts in planning casework....”*

[REDACTED – Out of scope]

It is important to note that the landscape concerning wild salmon interactions has moved on significantly since 2020. SEPA are currently developing a Sea Lice Risk Framework (SLRF). With the development of the SLRF, EMPs will become redundant as a regulatory tool to support wild fish protection, as stated by SEPA in their SLRF consultation material.

[REDACTED – Out of scope]

Finally, CES are the landlord for the marine estate. This role as currently constituted creates a puzzling conflict given the role of developing income streams from the marine estate. In terms of Marine Directorate, it is again puzzling given the publication of an Aquaculture vision supporting the sustainable growth of Scotland's salmon farming sector, to then use taxpayers' money on a role that is about reversing that objective.

[REDACTED – Out of scope]

Yours sincerely
[REDACTED – Regulation 11(2)]
Tavish Scott
CEO Salmon Scotland

cc: Ronan O'Hara, CEO Crown Estate Scotland

[REDACTED – Out of scope]

Enclosure 21 – Email from Salmon Scotland to the Scottish Government

From: Malcolm Pentland <Malcolm.Pentland@gov.scot>

Sent: Thursday, November 16, 2023 5:45 PM

To: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>; Bunten, Lin <Lin.Bunten@SEPA.org.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@sepa.org.uk>

Cc: Tavish Scott <tavish@salmonscotland.co.uk>; Ian Laister <ian.laister@bakkafrost.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@organicseaharvest.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@cookeaqua.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@bakkafrost.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@scottishseafarms.com>

Subject: RE: SAC / Pilots

Hi [REDACTED – Regulation 11(2)]

Thanks for this, and to Ian, [REDACTED – Regulation 11(2)] and Tavish for attending this morning's meeting.

It was great to hear confirmation at the SAC that there are sites now identified that can be used in the pilot and I know that Ms Gougeon is appreciative of the sector's support in relation to this. I understand that following the last workshop there is one outstanding issue, raised by colleagues representing the sector, in relation to information sharing arrangements. We think this can be surmounted relatively easily and I know that [REDACTED – Regulation 11(2)] has been in touch with you directly today to progress.

Best wishes
Malcolm

Malcolm Pentland - Deputy Director, Marine Economy and Communities

Marine Directorate | Scottish Government

Mobile: [REDACTED – Regulation 11(2)] | Email: malcolm.pentland@gov.scot



From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>

Sent: 16 November 2023 12:26

To: Malcolm Pentland <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>; Bunten, Lin <Lin.Bunten@SEPA.org.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@sepa.org.uk>

Cc: Tavish Scott <tavish@salmonscotland.co.uk>; Ian Laister <ian.laister@bakkafrost.com>; [REDACTED – Regulation 11(2)]@organicseaharvest.co.uk; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@cookeaqua.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@bakkafrost.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@scottishseafarms.com>
Subject: SAC / Pilots

Hi Malcolm, [REDACTED – Regulation 11(2)], Lin, [REDACTED – Regulation 11(2)],

I hope you are well. Tavish and I have had a catch up following the SAC meeting this morning.

We wanted to take this opportunity to reiterate that our members have identified a number of excellent candidate developments that can be progressed through the pre application pilot scheme that has been proposed by the CTG. These developments cover both Highland and Shetland. But to note, we are equally able to bring forward pilots in other Local Authority areas as and when possible.

There is now a level of urgency for progressing with these pilots. In particular, if we cannot move forward soon, it is likely that companies will need to progress through the existing system (thus missing the opportunity to “pilot” them), as these developments are key to the respective companies strategic plans and future stocking / production plans.

Can you confirm if we are able to progress in the next couple of weeks?

Thanks and kind regards
[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)]

M [REDACTED – Regulation 11(2)]

E [REDACTED – Regulation 11(2)]@salmonscotland.co.uk



www.salmonscotland.co.uk

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Enclosure 22 – Email from Salmon Scotland to SEPA, CC the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: 06 December 2023 09:11
To: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@SEPA.org.uk>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; Bunten, Lin <Lin.Bunten@SEPA.org.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@sepa.org.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@sepa.org.uk>; Malcolm Pentland <Malcolm.Pentland@gov.scot>
Subject: RE: Sea Lice Regulatory Framework (SLRF) consultation response publication & information notice

Dear [REDACTED – Regulation 11(2)],

Thank you for this email. I am advised that SEPA will publish tomorrow, Thursday. Perhaps out of courtesy to all of our people who will be directly affected by this, SEPA might confirm that?

The Salmon Board meets next week, and for the avoidance of doubt that is our regular meeting slot. All these matters will be fully assessed by the Board next week and thereafter Salmon Scotland will respond based on the Board's instructions.

I therefore note the contents of this, including the publication of farm site details and note for the record that this is bound to create media attention. As I am sure SEPA realise, the use of the phrase *relative risk* will be used aggressively by some.

I am copying this to Malcolm Pentland, Marine Directorate given Ministerial correspondence on this matter.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@SEPA.org.uk>

Sent: Wednesday, December 6, 2023 8:54 AM

To: Tavish Scott <tavish@salmonscotland.co.uk>

Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@salmonscotland.co.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@SEPA.org.uk>; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@sepa.org.uk>; [REDACTED – Regulation 11(2)] <[REDACTED – Regulation 11(2)]@sepa.org.uk>

Subject: Sea Lice Regulatory Framework (SLRF) consultation response publication & information notice

OFFICIAL

Dear Tavish,

SLRF Consultation Response Publication

SEPA have now concluded the review of the consultation responses and will aim to publish our consultation response later this week.

Prior to the publication I wanted to highlight two aspects.

As we finalised our consultation response, we have been continuing to refine our screening model with the inclusion of virtual salmon smolts, which has allowed us to better take account of exposure of migratory smolts going to sea lice. As part of the consultation response, we will publish an annex with the names and locations of Wild Salmon Protection Zones (WSPZ's) prioritised for further assessment and the 19 farms within those in the highest relative-risk category of the matrix. We have advised each company whether they have sites falling into that category and for those that do, have provided a list of the relevant sites.

I want to be clear at this point that these sites are identified in terms of **relative** risk only. This initial identification is to allow us to be able to target further assessment efforts to help us understand if any of these sites are having a demonstrable impact on the environment or not.

Alongside the publication of our consultation response document, we also plan on publishing a tool that we have developed to help visualise the existing sea lice data that is in the public domain (2021 – 2023) allowing us to more fully understand how similar data will fit in to any future framework.

To ensure you are sighted on this we have published a password protected version of this tool at the following link:

<https://informatics.sepa.org.uk/SeaLiceData>

Username: [REDACTED – Regulation 10(5)(f)]

Password: [REDACTED – Regulation 10(5)(f)]

*Note username and password are case sensitive

When the consultation response document is published the passwords will be removed, and it will be accessible either at the above link or directly from a link in the consultation response document.

Sea Lice and Fish Numbers data – Information Notice

In discussions with Salmon Scotland and several companies SEPA have continued to highlight the need for sea lice data and fish numbers to inform risk screening assessments and understand the typical performance of existing farms in managing sea lice. Our intention is now to serve an information notice under Regulation 36(2) of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 on all operators requiring the below information:

- Weekly, female adult sea lice counts for the years 2018, 2019 and 2020 (in the same format as has been reported for 2021 – 23).
- Weekly, gravid sea lice counts for the years 2018 to 2023.
- Calculated number of fish held at each farm in each week for the years 2018 to 2023.


The above data will be requested from the 16th March until 30th October inclusive for each year.

Our intention is to set a timeline of 6 weeks for operators to collate and submit and this data. We have asked operators to advise us if this will not be possible or feasible.


If you wish to discuss any of the above, please come back to me and I will organise a call.

Kind regards

[REDACTED – Regulation 11(2)]
[REDACTED – Regulation 11(2)] | [REDACTED – Regulation 11(2)] |
[Scottish Environment Protection Agency](#)

 [REDACTED – Regulation 11(2)]

 [REDACTED – Regulation 11(2)]@sepa.org.uk

 Angus Smith Building | 6 Parklands Avenue | Eurocentral | Holytown |
North Lanarkshire | ML1 4WQ



For the future of our environment

Regenerative SEPA: Working flexibly

At SEPA, we're working flexibly as part of our moves towards net zero and beyond.
[REDACTED – Regulation 11(2)]

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Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois diomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh arithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu postmaster@sepa.org.uk. Togalach Aonghais Mhic a' Ghobhainn, 6 Craobhraid Parklands, Eurocentral, Baile a' Chuilinn, Siorrachd Lannraig a Tuath, ML1 4WQ. Faodar conaltradh còmhla ri SEPA a sgrùdadh no a chlàradh no a sgaoileadh gus obrachadh èifeachdach an t-siostaim a ghlèidheadh agus airson adhbharan laghail eile.

Enclosure 23 – Email from sector to the Scottish Government

From: Malcolm Pentland <Malcolm.Pentland@gov.scot>

Sent: Wednesday, December 20, 2023 10:49 AM

To: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@scottishseafarms.com>

Subject: RE: Happy festive holidays

Thanks for this [REDACTED – Regulation 11(2)] and for all you have done/are doing to help make it progress. Have a great festive break.

Malcolm

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@scottishseafarms.com>

Sent: 20 December 2023 10:40

To: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>;

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>;

chair@sose.scot; [REDACTED – Regulation 11(2)]@bakkafrost.com;

dickon@howellmarine.co.uk; [REDACTED – Regulation 11(2)]@mowi.com;

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>;

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>;

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>;

Malcolm Pentland <Malcolm.Pentland@gov.scot>; [REDACTED – Regulation 11(2)]@highland.gov.uk;

[REDACTED – Regulation 11(2)]@sepa.org.uk; [REDACTED – Regulation 11(2)]@sepa.org.uk;

[REDACTED – Regulation 11(2)]@gmail.com; [REDACTED – Regulation 11(2)]@shetland.gov.uk;

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>;

[REDACTED – Regulation 11(2)]@cookeaqua.com; [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>

[REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot>

Subject: Happy festive holidays

Hi all,

Thanks for the work this year in progressing the simplification/streamlining of the consenting process for marine finfish farming.

SSF commenced the stage 1 for an application with SIC/SEPA early December and aware (from [REDACTED – Regulation 11(2)]) that Mowi have also started a process with Highland Council – positive to be at this point with a 2023 date.

Lots to do in 2024 to smooth out the details and running order but live trials and our collective will to deliver and adapt the process was actively present and in action in SSF's kick-off meeting.

Looking forward to working with you all and the wider stakeholder community on this in 2024.

Many thanks and wishing everyone a great festive break

[REDACTED – Regulation 11(2)]

[REDACTED – Regulation 11(2)],

[REDACTED – Regulation 11(2)]

Mobile [REDACTED – Regulation 11(2)]

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Enclosure 24 – Email from Salmon Scotland to the Scottish Government

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Wednesday, January 17, 2024 6:32 PM
To: Cabinet Secretary for Wellbeing Economy, Fair Work & Energy
<CabSecWEFWE@gov.scot>
Subject: Regulatory reform - Scotland's aquaculture sector

Neil Gray MSP
Cab Sec for Wellbeing Economy, Fair Work and Energy
Scottish Government

Dear Neil,

Further to your invitation from today's session hosted by Prosper I provide the details of Professor Russel Griggs review into aquaculture regulation. This review followed the SNP's welcome manifesto commitment to that effect from the previous Scottish Parliamentary elections.

In August 2021, Professor Russel Griggs was tasked by the Scottish Government to deliver a review into the regulation of aquaculture. Professor Griggs reported on 10th February 2022 and the Scottish Government accepted all Professor Griggs's recommendations in principle. Indeed Cab Sec Gougeon accepted his recommendations on 11th February including delivery of reform within 12 months.

Professor Griggs report with recommendations is as follows;

<https://www.gov.scot/publications/review-aquaculture-regulatory-process-scotland/pages/2/>

Professor Griggs concluded;

My final recommendation is that a short term project board is established which oversees, drives, and guides all the varying parts, so that all the above can be put in place, where possible, within a 12 month period.

I would respectfully ask that Government carefully consider what has actually been achieved in terms of reform 23 months on from Professor Griggs report. All that my sector can point to is that a pilot approach to a new management process for pre-application activities within the existing fish farm consenting process will start this month. That is welcome but hardly constitutes the root and branch streamlining reform that Prof Griggs recommended. Nor does this one step forward constitute the majority, never mind all of the recommendations that Ministers have endorsed.

The salmon sector as you know employs 12,000 people across the country and in the most far flung parts of coastal Scotland, is the nations' No 1 food export by volume and is committed to the Scottish Government's net zero target by 2045. Given all this and our desire to sustainably grow to the benefit of the Scottish economy, we are disappointed and puzzled as to why such a clear Ministerial

endorsement of an independent regulatory assessment has proved so difficult to implement or even make substantive progress.

On that we need your assistance.

Best wishes

Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]

E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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