

## **Questions for SEPA's Finfish Aquaculture Sector Review**

Fish farm companies are planning to double capacity by 2030, using open nets - the main reason this industry pollutes the sea more than any other.

- What will SEPA do about the fish farm pesticides that can kill crabs, lobsters & prawns, and threaten jobs in our communities?
- Not all exposed sites are far from shore, so how will SEPA make sure the larger amount of pollution from larger farms in these places does not affect the coastal communities that live and work there?
- Why is fish farming allowed to pollute 'mixing zones' that are so much larger than other industries'?
- Will this still be the most polluting industry of the sea after the changes?
- How does SEPA know that the sea here can absorb twice as much pollution?
- When will SEPA regulate hydrogen peroxide?
- Why not apply the revised emamectin standard to existing farms now? Surely it is either doing harm or it isn't.
- Pollution travels. How can SEPA be sure fish farms will not harm Priority Marine Features if it doesn't know where all the PMFs are for miles around?
- Well-boats aren't licensed or monitored by SEPA. Are fisheries and PMFs being harmed where they dump their pesticides?
- Will SEPA take a precautionary approach before consenting any larger farms, and first make sure it knows their impacts on shellfish, PMFs and wild salmon & sea trout?

## **Biodiversity duty to wild salmon & sea trout**

SEPA consents the biomass of fish in farms & has a legal duty to protect biodiversity.

- Will it take responsibility for the impact of sea lice on wild fish and their loss to our rivers and seas?
- Will SEPA rectify this by acting to reduce sea lice impacts on wild fish to zero?
- Does SEPA accept that larger farms in exposed sites will release more sea lice, and that the sea lice will spread further on stronger currents?
- Does SEPA accept responsibility for the higher risk of fish escaping from larger farms in more exposed sites?

## **Modelling and monitoring**

- Has SEPA stopped using the Autodepomod pollution modelling software?
- Isn't larger-scale hydrodynamic modelling essential for all sites?
- Who will monitor the spread of bath pesticides and how?
- Is SEPA sure that dissolved nutrients aren't promoting harmful bacteria and algal blooms?
- Why not have full-time independent observers on farms and well-boats paid for by industry? It happens in fisheries in the Falklands and Alaska.

## **Compliance with the law**

- Why have there been no prosecutions, no fines and no licences revoked for ten years?  
Is it because self-reported data can't be used as evidence in court?
- Will SEPA end self-monitoring?
- How does SEPA identify fraud, e.g. deliberate overstocking and keeping false records?
- Why is it right that BDNC Loch Shuna should get planning permission for 3500 tonnes of fish, when it had borderline seabed results at 2500t?
- Some of the new regulations will not take effect until 2024. Couldn't this happen more quickly?

## **Beyond Compliance to One World Prosperity**

- Why not set a 2030 deadline for reducing pollution to zero, by capturing it all, and for there to be no sea lice releases by then, so the industry can plan its investments in new equipment and research?
- Instead of encouraging larger open net farms in exposed places, why not encourage the uptake of new technology, by limiting all farm expansion to closed containment methods?