SCOTTISH AQUACULTURE – A FRESH START

A consultation on a renewed Strategic Framework for Scottish Aquaculture

ANALYSIS OF CONSULTATION RESPONSES

APRIL 2009

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ACKNOWLEDGEMENTS

The Scottish Government is grateful to all those who responded to the consultation exercise and contributed to the previous development of the consultation document through replies to the Ministerial letter, attending bilateral meetings, stakeholder roadshows and industry workshops. The Scottish Government is also grateful to the Ministerial Working Group on Aquaculture (MWGA) for its help in developing the consultation document.

EXECUTIVE SUMMARY

The consultation document, 'Scottish Aquaculture – a Fresh Start' sought views on a proposed renewed Strategic Framework for Scottish Aquaculture. It was published on 13 August 2008 with written responses requested by 5 November 2008. The consultation contained six main questions, some with closed or open subsidiary questions on a draft strategic framework. It invited views on a proposed way of working and identified issues to be tackled through the following five themes:

- Health
- Planning, consents and sites
- Containment
- Markets, marketing and image
- Finance

A **total of 57 responses were received** by the end of the consultation period. These comprised 10 responses from individuals and 47 responses from organisations.

This analysis is intended to reflect these views and responses as accurately as possible. However it is not a comprehensive report on every comment received. All non-confidential responses submitted are available on the Scottish Government website. Given the self selecting nature of such consultation exercises it should be noted that the views in this report cannot be extrapolated to a wider population.

Almost three-quarters of responses (38 out of 57) agreed in principle that the Ministerial Working Group on Aquaculture should be refocused, take a leadership role to review progress and reprioritise actions, with champions driving progress on issues under each theme. This was shown across all stakeholder categories.

Responses also supported the proposal for the renewed framework to make best use of R&D, innovation and new technologies and that it should have a focus on education and training, including the promotion of aquaculture as a viable career.

A majority of responses (34) agreed that the five themes approach proposed is sufficiently flexible to accommodate new and emerging issues, including almost all respondents from the following sectors: industry, local government/planning, public sector/regulatory bodies and academic/scientific responses. Less than a fifth disagreed. Those who did not think the five themes approach was sufficient suggested additional themes of "environmental protection", "health and welfare" and "sea lice". An additional theme of "skills and training" was also suggested.

When considering the issues set out in the consultation document, **almost two-thirds (33) of responses (across most categories of respondent) either fully or mostly agreed that the main issues to be addressed had been identified.**

This broad agreement is possibly a reflection of the wide ranging pre-consultation exercise held and which informed the selection of the main themes.

When asked about the **desired outcomes proposed in the consultation document**, **almost two-thirds fully or mostly agreed**. This included the majority of industry, public sector and academic/scientific responses. Ten respondents partially agreed which, in many cases, was only in relation to a particular theme.

When asked to name one **key issue** to be tackled under the **health theme**, 29 out of the 47 responses (**nearly two-thirds**) to this question **chose sea lice** as the issue of most concern. Disease control and emerging diseases; concern about hatcheries and shellfish quality were each chosen as the key issue by small numbers. Other issues raised included animal welfare, importance of healthy eating and availability of medicines for fish farm operators.

Across stakeholder categories, the majority of **wild fish interests** highlighted **sea lice** as the priority issue as did two-thirds of **recreation/tourism.** Industry responses were spread over five different issues and influenced by whether the respondent represented salmon farming or other species interests. **Environmental protection** responses were clearly concerned about humane **control and welfare** of **aquaculture predators**, particularly seals.

On planning, consents and sites, 15 out of 52 responses **highlighted fitness for purpose of the locational guidelines** as the issue of most concern. This was **closely followed** by **14 responses** which selected **simplifying procedures and links with the Marine Bill and the Scottish Marine Management Organisation** as the priority. Ten (about one-fifth) suggested improving the availability of sites for expansion and rationalisation. Other responses raised the issue of the large number of undeveloped leases or suggested additional (other) issues that could be addressed under this theme. This included two respondents who commented that no expansion of the industry be permitted until it can be proven that there is associated no damage to wild fish stocks; another suggested a relocation scheme and another suggested a need for training to be included within this theme.

There were clear differences across the stakeholder categories. Those from the **aquaculture industry** were spread over: **availability of sites**, the need to free up **undeveloped leases** and concerns over the impact of the **Scottish Marine Bill and Marine Scotland** on aquaculture development and **decision making**. The majority of **wild fish interests** and **environmental protection** responses clearly highlighted **locational guidelines** as the key issue of concern and specifically decision making on the **siting or impact of aquaculture on wild fisheries**. The majority of **local government/planning** respondents selected **Scottish marine bill/Scottish Marine Management Organisation**. This is clearly a reflection of local authority concerns on how **planning decisions** will be made under the new organisation.

On containment, 20 out of 45 **responses (nearly half) highlighted minimising or eradicating escapes as the priority**. Ten indicated implementation of the Aquaculture and Fisheries (Scotland) Act was the priority and eight highlighted the need for best practice and containment technology. A further three considered traceability of escaped fish a priority. The additional (other) issue raised was control of seals and other predators which was a priority for four respondents.

There were differences across stakeholder categories. Aquaculture industry responses were spread evenly over four issues of: minimise or eliminate fish farm escapes; implementation of the Aquaculture & Fisheries Act 2007; best practice and technology for containment and other/control of seals and predators. The majority of **wild fish interests** selected **minimising or eradicating escapes** or **traceability** of escaped fish.

On markets, marketing and image, **14** out of 37 **(over one-third) respondents selected image of the aquaculture industry as the priority**. Nine (just under a quarter) prioritised feed sustainability; three highlighted developing the Scottish premium and four raised other issues which included: training for aquaculture staff; improving opportunities for shellfish growing and the health benefits of aquaculture products.

When comparing responses between stakeholder categories, only half of **wild fish** interests expressed a view on this theme. Of those who did, **image** of the industry or **feed sustainability** were the key concerns. All **environmental protection** responses selected **feed sustainability** as the key issue for this theme. **Aquaculture industry** responses were spread across five issues, with **image** being viewed most important in half of the responses.

On finance, competitiveness of the aquaculture industry was the chosen priority for 9 out of 35 **(just over one quarter) respondents.** Eight chose use of innovation and new technology as a priority. Seven selected access to public funds and four highlighted the need to encourage long term investor confidence. Additional (other) issues raised were the filling of scientific/evidence gaps on environmental issues and contingency funding.

When considering sectoral differences, only half of **wild fish** interests expressed a view on this theme. Of those who did, funding for **innovation and new technology** was most popular. This view was shared by **environmental protection** with two-thirds selecting this issue. **As with the other themes, aquaculture industry responses were spread across most issues**. Their main areas of concern were; **competitiveness,** access to **public sector funds** and **securing increased investor confidence**. Competitiveness of the industry was also the clear area of concern for local government/planning.

When considering **every issue of concern raised by each respondent** rather than just the top priority**,** the one of **most concern** and **raised by the most respondents was marine planning** with **31 (more than half) of all responses.** This was followed by **sealice (30); minimising or eradicating fish farm escapes (29); impact of aquaculture on the environment and other users (27);** the importance of using **best practice and technology for containing fish (23)** and **fitness for purpose of locational guidelines (23).**

Other issues that were raised in a significant number of responses included: the image of aquaculture; Implementation of the Aquaculture and Fisheries (Scotland) Act 2007; the Marine Bill; disease control and emerging disease; inappropriate siting; encouraging investor confidence; site availability; hatcheries and production of disease-free eggs, smolts and spat and Tripartite Working Group.

When asked about measuring progress, 36 commented. Of those, 18 agreed that progress should be reviewed against outcomes set for each key theme and that **it should be for the refocused Ministerial Working Group on Aquaculture to agree and develop the mechanism for measuring progress**. This included two-thirds of all industry and of public sector/regulatory body responses. A further nine (one quarter) suggested environmental performance indicators should be measured such as trends in numbers of fish farm escapes, sea lice numbers and wild fish returns; four suggested on-site monitoring or the use of large and small farms as indicator comparison sites.

The consultation highlighted **clear differences across stakeholder groups**. **Wild fish interests** were most concerned about the impact of aquaculture on biodiversity and the wider environment, particularly **sea lice, fish farm escapes** and **inappropriate siting**. These views were shared by **environmental protection other than wild fish** which also raised concerns over **welfare** of farmed fish, control of fish farm predators, particularly **seals**, and **feed sustainability**. The aquaculture **industry** highlighted the need for **fair and proportionate regulatory and licensing regimes** to be in place, **access to bigger or better sites**, **availability of sealice medicines** and the ability to **compete with competitor countries**. They also highlighted to urgency to focus on marketing the positive image of the industry to attract **investor confidence** to secure long term funding of the sector.

INTRODUCTION

Background to Consultation

On 13 August 2008, Michael Russell MSP, the then Scottish Government Minister for Environment, launched a public consultation on a renewed strategic framework for Scottish aquaculture. This will replace *A Strategic Framework for Scottish Aquaculture*,[1] which was published in 2003 and provided a set of parameters, within which the industry could develop sustainably, balancing socio-economic benefits against environmental impacts.

The consultation document, *A Fresh Start for Scottish Aquaculture*,[2] was developed from wide ranging pre-consultation activity, during which stakeholders were asked to identify the issues they felt should be addressed in a Renewed Strategic Framework. This included a Ministerial letter to a comprehensive list of aquaculture stakeholders seeking views on the key issues for a renewed framework, bilateral meetings with stakeholder groups, and public roadshows in Inverness, Oban, Scalloway and Stornoway. The consultation was also informed by aquaculture industry workshops in Inverary, a salmon 'fresh start summit' in Edinburgh and a shellfish growers' workshop in Oban.

The "Fresh Start" document sets out the issues that emerged from the pre-consultation exercises as a draft strategic framework for Scottish aquaculture and invited responses on six main or key questions, some with subsidiary questions, closed and open. It invited views on what were the issues to be tackled through the following themes:

- Health
- Planning, consents and sites
- Containment
- Markets, marketing and image
- Finance

It also proposed that a renewed Framework would align to wider policy initiatives such as the National Food and Drink Policy, the Scottish Marine Bill and will sit within the Scottish Government overarching strategy to deliver sustainable economic growth. The consultation document also proposed a more flexible approach for delivery through a refocused Ministerial Working Group on Aquaculture, which will steer aquaculture policy and proposes a wider Aquaculture Forum. The Document also proposed a renewed framework underpinned by smarter regulation and making best use of science, research and development.

The consultation closed on 5th November 2008 with a renewed Strategic Framework for Scottish Aquaculture expected to be in place in the first half of 2009.

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[1] www.scotland.gov.uk/Publications/2003/03/16842/20502
[2] www.scotland.gov.uk/Publications/2008/08/06103512/0

Document distribution

This consultation was run in accordance with Scottish Government best practice guidance. The document was posted and emailed to a wide range of aquaculture stakeholders as well as being made available on the consultation section of the Scottish Government website. A list of stakeholder groups issued with the document is attached at Annex D. Respondents were able to respond by email, by post or by an online electronic response form on the Scottish Government website.

Handling responses

A Respondent Information Form was issued with all consultation documents to ensure responses would be dealt with as instructed by the respondent. Where respondents gave permission for their response to be made public, these were made available in the Scottish Government Library and on the Scottish Government consultation web pages. Responses were checked for any potentially defamatory material before logging them in the library or placing them on the website. The consultation document also stated that respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

Analysis

All responses to this consultation have been given due and equal consideration. Where a response is not clear, or has not directly answered the questions posed, comments have been allocated as closely as possible to the most relevant/similar issue. Where relevant, differences in responses between stakeholder groups are highlighted.

The findings in this report are specific to the consultation exercise and do not necessarily reflect the weight or range of views within the population or sub populations as a whole, as the respondents have not been representatively or purposively sampled.

Factual Accuracy

The views presented in this analysis have not been vetted in any way for factual accuracy. The opinions and comments submitted to the consultation may be based on fact or, indeed, may be based on what consultees perceive as accurate, but which others may interpret differently. It is important to represent views from all perspectives. This report, therefore, may contain analysis of responses which may be factually inaccurate or based on misunderstanding or misinformation on the issues but nevertheless reflect strongly held views. In some instances, such inaccuracies and misunderstandings will be relevant findings in themselves.

Next steps

The responses will inform the renewed Strategic Framework for Scottish Aquaculture document **which is expected to be published in the first half of 2009**.

RESPONDENTS

Table 1 – Responses by stakeholder category

Stakeholder Category	Total	Percentage
Academic/scientific	4	7
Aquaculture industry	12	21
Environmental protection – other than wild fish	4	7
Local government/planning	7	12
Other	4	7
Other business/industry	3	5
Public health and food safety	1	2
Public sector/regulatory body	6	11
Recreation/tourism	3	5
Wild fish interests	13	23
Total	**57**	**100**

A total of **57 responses were received** which were treated as being valid submissions. The analysis reported in this paper is based on these. Ten were received on behalf of individuals and 47 were on behalf of organisations or groups.

Table 1 shows that, when considering stakeholder categories, the highest number were received from wild fish interests (23%). This was followed by the aquaculture industry (21%), Local government/planning (12%) and public sector/regulatory bodies (11%). Responses were also received from the following categories: Academic/scientific (7%) environmental protection - other than wild fish (7%), other business/industry (5%), Recreation/tourism (5%), public heath/food safety (2%) and others (7%).

Consultees were provided with a pro-forma on which to provide their responses to the consultation questions. Three-quarters used the form. For the purpose of this analysis, all comments received, whether on the pro-forma or not, were attributed as closely as possible to the questions posed. **Where a respondent did not respond to a particular question or did not indicate a view which could be clearly attributed to one of the suggested response categories, in the case of a closed question with options, this was treated as not answered.**

Of 58 separate responses[3] 50 gave permission for their response to be made publicly available; another two gave permission on the condition of anonymity. The other six respondents requested confidentiality and therefore, these, are not publicly available.

A full list of respondents who agreed to make their response public is attached at Annex E. Non-confidential responses have also been published on the Scottish Government website at www.scotland.gov.uk/Topics/Fisheries/Fish-Shellfish/

[3] Fifty-eight separate responses to the consultation were received. However, two were on behalf of the same organisation, so were treated as one response.

FINDINGS

The proposed Strategic Framework suggests a way forward for Scottish aquaculture. The Ministerial Working Group on Aquaculture will have an over-arching role across the five themes, to review progress, reprioritise planned actions and to deal with emerging issues as appropriate. Priority actions will be reassessed and agreed at each meeting and a champion for each of the five themes will be responsible for reporting back to the MWGA.

Question 1: Do you agree, in principle, with this proposed way of working?

Table 2

Stakeholder Category	Yes	No	Don't Know/No opinion
Academic/scientific	3	0	0
Aquaculture industry	10	0	2
Environmental protection-other than wild fish	2	1	1
Local government/planning	6	0	0
Other	3	0	1
Other business/industry	2	1	0
Public health and food safety	1	0	0
Public sector/regulatory body	5	1	0
Recreation/tourism	1	1	1
Wild fish interests	5	4	2
Total (53)	38	8	7
Percentage	**72**	**15**	**13**

Table 2 shows that 38 out of 53 (almost three-quarters) responses on this question agreed in principle that the Ministerial Working Group on Aquaculture should be refocused, take a leadership role to review progress and reprioritise actions, with champions driving progress on issues under each theme. This was supported across all stakeholder categories including almost all industry interests, public sector/regulatory bodies and local government/planning responses and by around half of the wild fish interests responses.

Eight disagreed and seven chose the 'Don't know/no opinion' option.

When considering sectoral differences it was clear that the majority of respondents from the aquaculture industry, local government/planning and public sector/regulatory bodies agreed with the proposed way forward. Nearly one half of wild fish interests disagreed.

A number or respondents sought clarification of the membership of the refocused MWGA to ensure broad stakeholder interests are represented as policy develops and agreed actions are implemented.

Therefore, there was general agreement that MWGA should be refocused and have an overarching role to review progress and reprioritise actions, with champions driving progress and reporting back to MWGA.

The *Strategic Framework for Scottish Aquaculture* is based on the five key themes of: Health; Planning, Consents and Sites; Containment; Markets, Marketing and Image; and Finance.

Question 2: Do you agree that the 'five themes approach' proposed in this Framework is sufficiently flexible to accommodate new and emerging issues?

Table 3

Stakeholder Category	**Yes**	**No**	**Don't know/No opinion**
Academic/scientific	4	0	0
Aquaculture industry	10	1	1
Environment protection – other than wild fish	0	4	0
Local government/planning	6	0	0
Other	2	0	1
Other business/industry	1	0	2
Public health and food safety	1	0	0
Public sector/regulatory body	4	1	0
Recreation/tourism	1	1	1
Wild fish interests	5	2	2
Total (50)	34	9	7
Percentage	**68**	**18**	**14**

Table 3 shows that 34 of 50 responses on this question agreed that the five themes approach proposed is sufficiently flexible to accommodate new and emerging issues. This endorsement included most of those answering this question from industry, local government, the public sector/regulatory bodies and academic/scientific responses.

Nine disagreed including all four environmental protection responses. The main reason stated was that animal welfare and general environmental concerns could not be sufficiently covered by the themes as proposed. They suggested additional themes of "environmental protection" and "health and welfare". A very small number of wild fish interests also disagreed and suggested a separate "sea lice" theme is needed. An additional theme of "skills and training" was also suggested and two responses suggested an additional "Governance" theme.

Some respondents commented that the themes are not equally important with the emphasis on individual themes differing depending on which interest group the respondent represented.

The main issues raised by stakeholders during the pre-consultation exercise have been marshalled into five key themes and set out in this document.

Question 3: Do you agree that the main issues to be addressed have been identified in this draft Strategic Framework?

Table 4

Stakeholder Category	Yes Fully	Yes Mostly	Yes Partly	No	Don't know/No opinion
Academic/scientific	0	3	0	1	0
Aquaculture industry	6	2	0	3	1
Environmental protection – other than wild fish	0	0	2	2	0
Local government/planning	5	0	1	0	0
Other	2	0	0	1	0
Other business/industry	1	0	0	0	2
Public health and food safety	0	0	1	0	0
Public sector/regulatory body	3	1	1	1	0
Recreation/tourism	1	0	0	1	1
Wild fish interests	6	3	2	1	1
Total (55)	24	9	7	10	5
Percentage	**44**	**16**	**13**	**18**	**9**

Table 4 shows that 33 out of 55 responses either fully or mostly agreed that the main issues to be addressed had been identified. There was agreement across academic/scientific, industry, local government/planning and wild fisheries interests.

Ten of the responses disagreed.

This broad agreement is possibly a reflection of the wide ranging pre-consultation exercise held and which informed the selection of the main themes.

Respondents commented that some issues were either missing from the proposed framework or it was not clear how they would be dealt with in the suggested structure. These included: consideration of alien species; animal welfare; impact on angling, tourism and other water users; a review of the containment and environment sections of the finfish industry Code of Good Practice; training and education; promotion of shellfish.

There was general comment that now key issues have been identified, action plans should be agreed and implemented.

Desired outcomes for each of the issues identified within each of the key themes are set out in the consultation document.

Question 4: Do you agree with the proposed desired outcomes?

Table 5

Stakeholder Category	Yes Fully	Yes Mostly	Yes Partly	No	Don't know/No opinion
Academic/scientific	0	4	0	0	0
Aquaculture industry	8	3	0	0	0
Environmental protection – other than wild fish	0	0	3	1	0
Local government/planning	3	1	1	0	1
Other	2	0	0	0	1
Other business/industry	1	0	0	0	2
Public health and food safety	0	0	1	0	0
Public sector/regulatory body	5	0	0	0	0
Recreation/tourism	1	0	0	1	1
Wild fish interests	2	0	5	1	1
Total (49)	22	8	10	3	6
Percentage	**45**	**16**	**21**	**6**	**12**

Table 5 shows that 30 out of 49 responses fully or mostly agreed with the desired outcomes proposed in the consultation document. This included the majority of industry, public sector/regulatory bodies and academic/scientific responses.

Ten partially agreed and in many cases non-agreement was about a specific theme.

Six of the 49 chose 'Don't know/no opinion' and just three disagreed with the proposed outcomes.

Comments from respondents who did not fully agree included: outcomes should clearly differentiate between freshwater and marine aquaculture; focus on positive image of aquaculture; include moving to land-based facilities or relocation of farms away from mouths of important salmon rivers.

Question 5: What do you think is the priority issue for each of the key themes, as described in this document?

In this section, each theme has been set out separately. In the first part of analysis of Question 5 (tables 6-10) only one issue per theme - viewed by each respondent as the most important to them - has been included. This includes where the specific sections of the questionnaire have not been completed, but it is clear from the overall response what the respondent's priority issue for each theme is.

At the end of this section, Table 11 sets out a full list of issues raised across all responses, ranked in order of the number of stakeholders who highlighted the issue.

5a. Health

Issues as identified in consultation document:

Sea lice (SL)
Tripartite Working Group (TWG)
Hatcheries/disease free eggs, smolts or spat (HDF)
Shellfish quality (SQ)
Waste (Wa)
Aquatic Animal Health Directive (AAHD)
Disease Control & emerging disease (DCED)
Other (Oth)

Table 6

Stakeholder Category	SL	TWG	HDF	SQ	Wa	AAHD	DCED	Oth
Academic/scientific	2	1	0	0	0	0	1	0
Aquaculture industry	5	0	2	2	0	1	1	0
Environmental protection – other than wild fish	2	0	0	0	0	0	0	2
Local government/ planning	3	1	0	0	0	0	0	0
Other	1	0	0	1	0	0	0	0
Other business/industry	1	0	0	0	0	0	0	0
Public health and food safety	0	0	0	0	0	0	0	1
Public sector/regulatory body	4	0	1	0	0	0	1	0
Recreation/tourism	2	0	0	0	0	0	0	0
Wild fish interests	9	0	0	0	1	0	2	0
Total (47)	29	2	3	3	1	1	5	3
Percentage	**62**	**4**	**6**	**6**	**2**	**2**	**11**	**7**

Table 6 shows that of the 47 responses expressing a view, 29 chose sealice as the issue of most concern. This included responses from: three-quarters of wild fish interests, nearly half of industry, two-thirds of recreation/tourism and public sector/regulatory bodies and half of environmental protection.

A further five of the 47 responses prioritised disease control and emerging diseases. Three were concerned about hatcheries and a further three highlighted shellfish quality.

Other issues raised included animal welfare, the importance of healthy eating and availability of medicines for fish farms.

When considering sectoral responses, the majority of wild fish interests highlighted sea lice and its impact on wild fish as the priority issue. This view was shared by two-thirds of recreation/tourism responses linking declines in wild fish stocks to loss of business.

Industry responses were spread over five different issues and dependent on whether the respondent represented salmon farming or other species. Salmon concerns included access to medicines to control sealice. Other finfish species were concerned with the impact of the Aquatic Animal Health Directive or maintaining disease free hatcheries.

Environmental protection other than wild fish responses were concerned with the impact of sea lice on the wider environment or the associated welfare implications to infected farmed fish.

5b. Planning Consents and Sites

Issues as identified in consultation document:

Site availability for expansion (SA)
Undeveloped leases (UL)
Locational Guidelines/Siting of farms (LGS)
Simplification of procedures and links to Marine Bill and Scottish Marine Management Organisation (MB)
Other (Oth)

Table 7

Stakeholder Category	SA	UL	LGS	MB	Oth
Academic/scientific	0	0	1	2	1
Aquaculture industry	5	3	0	3	0
Environmental protection – other than wild fish	0	0	2	2	0
Local government/planning	0	0	2	5	0
Other	1	0	1	1	0
Other business/industry	1	0	0	0	1
Public health and food safety	0	0	1	0	0
Public sector/regulatory body	3	2	0	1	0
Recreation/tourism	0	1	1	0	1
Wild fish interests	0	0	7	0	4
Total (52)	10	6	15	14	7
Percentage	**19**	**12**	**29**	**27**	**13**

Table 7 shows that of the 52 responses expressing a view, 15 highlighted fitness for purpose of the locational guidelines as the issue of most concern. This includes respondents whose concerns related to siting of farms.

Fourteen responses prioritised simplifying procedures and links with the Marine Bill and the Scottish Marine Management Organisation; ten (about a fifth) prioritised improving the availability of sites for expansion and rationalisation; and six raised the issue of the large number of undeveloped leases.

Seven responses suggested additional issues that could be addressed under this theme, including two respondents who commented that no expansion of the industry be permitted until it can be proven that there is no associated damage to wild fish stocks. One respondent suggested a relocation scheme and another suggested a need for training to be included within this theme.

Responses show clear differences across stakeholder categories. Those from the aquaculture industry were spread over three issues: availability of sites; freeing up undeveloped leases and concerns over the impact of the Scottish Marine Bill and Marine Scotland on aquaculture development and decision making. The majority of wild fisheries interests and environmental protection responses clearly highlighted locational guidelines as the key issue of concern and specifically decision making on the siting or impact of aquaculture on wild fisheries. The majority of local government/planning responses prioritised simplifying procedures and links with the Marine Bill and the Scottish Marine Management Organisation. This reflects concerns about how planning decisions will be made under the new organisation.

5c. Containment

Issues as identified in consultation document:

Minimise/Eliminate fish farm escapes (ME)
Implementation of Aquaculture & Fisheries (Scotland) Act 2007 (AFA)
Best practice & technology for Containment (BPT)
Escapes contingency planning (EP)
Traceability of escapes (Tr)
Other – seals & predators (Oth SP)

Table 8

Stakeholder Category	ME	AFA	BPT	EP	Tr	Oth SP
Academic/scientific	1	1	1	0	1	0
Aquaculture industry	2	3	3	0	0	3
Environmental protection – other than wild fish	2	1	1	0	0	0
Local government/planning	3	2	0	0	0	0
Other	0	0	0	0	0	0
Other business/industry	0	0	0	0	0	1
Public health and food safety	0	0	0	0	0	0
Public sector/regulatory body	3	0	3	0	0	0
Recreation/tourism	1	1	0	0	0	0
Wild fish interests	8	2	0	0	2	0
Total (45)	20	10	8	0	3	4
Percentage	**44**	**22**	**18**	**0**	**7**	**9**

Table 8 shows that of the 45 responses expressing a view on the containment theme, 20 highlighted minimising or eradicating escapes as the priority. This view was shared across seven stakeholder categories including a majority of wild fish interests and local government/planning responses and half of those from recreation/tourism and environmental protection other than wild fish.

Ten responses prioritised implementation of the Aquaculture and Fisheries (Scotland) Act; 8 (just under one fifth) highlighted the need for best practice and containment technology and three considered traceability of escaped fish a priority. The other issue raised was control of seals and other predators which was a priority for four respondents (three of which were from industry).

There were clear differences across stakeholder categories. Aquaculture industry responses were spread evenly over four issues: minimise or eliminate fish farm escapes; implementation of the Aquaculture & Fisheries Act 2007; best practice and technology for containment and other – control of seals and predators. Wild fish interest responses were spread over three issues: the majority selecting minimising or eradicating escapes; two selecting implementation of the Aquaculture & Fisheries Act 2007 and another two selecting traceability of escaped fish (two-thirds of all responses selecting this issue).

5d. Markets, Marketing and Image

Issues as identified in consultation document:

Image of aquaculture (Im)
Aquaculture as a viable career (VC)
Industry structure and links to supply chain (ISt)
Scottish premium (SP)
Developing niche markets (NM)
Loss of MIP/Trade defence (TD)
Species diversification (SD)
Feed sustainability (FS)
Other (Oth)

Table 9

Stakeholder Category	Im	VC	ISt	SP	NM	TD	SD	FS	Oth
Academic/scientific	0	1	0	1	0	0	0	0	1
Aquaculture industry	5	0	0	1	2	1	1	0	0
Environmental protection – other than wild fish	0	0	0	0	0	0	0	3	0
Local government/planning	1	0	1	0	0	0	0	2	0
Other	0	0	0	0	0	0	0	0	1
Other business/industry	1	0	0	0	0	0	0	0	1
Public health and food safety	0	0	0	1	0	0	0	0	0
Public sector/regulatory body	4	0	0	0	0	0	0	1	1
Recreation/tourism	1	0	0	0	0	0	0	1	0
Wild fish interests	2	0	1	0	0	0	0	2	0
Total (37)	14	1	2	3	2	1	1	9	4
Percentage	**38**	**3**	**5**	**8**	**5**	**3**	**3**	**24**	**11**

There were just 37 responses on this theme.

Table 9 shows image of the aquaculture industry was the most frequently selected priority, with fourteen responses (over one third), across industry, public sector/regulatory bodies and wild fish interests. Nine (including all environmental protection interests and about half of wild fish interests and of local government/planning) of the 37 prioritised feed sustainability and another three chose developing the Scottish premium. Other issues included: training for aquaculture staff; improving opportunities for shellfish growing and the health benefits of aquaculture products.

When considering sectoral differences, only half of wild fish responses expressed a view on this theme. Of those who did, image of the industry or feed sustainability were the key concerns. All environmental protection responses selected feed sustainability as their key issue for this theme. Ten aquaculture industry responses were spread across five issues, with image being viewed as most important in half of their responses and developing niche markets raised by two industry respondents.

5e. Finance

Issues as identified in consultation document:

Competitiveness of industry (Co)
Encourage investor confidence (IC)
Access to private sector funds (Pr)
Access to European Fisheries Fund (EFF)
Access to public sector funds (Pu)
Innovation/New technology (INT)
Better use and sharing of facilities (Sh)
Other (Oth)

Table 10

Stakeholder Category	Co	IC	Pr	EFF	Pu	INT	Sh	Oth
Academic/scientific	0	0	0	0	1	1	1	0
Aquaculture industry	3	2	1	1	3	1	0	0
Environmental protection – other than wild fish	0	0	0	0	0	2	0	1
Local government/planning	4	0	1	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Other business/industry	0	1	0	0	0	0	0	0
Public health and food safety	0	0	0	0	1	0	0	0
Public sector/regulatory body	2	1	0	0	1	2	0	0
Recreation/tourism	0	0	0	0	0	0	1	0
Wild fish interests	0	0	0	0	1	2	0	1
Total (35)	9	4	2	1	7	8	2	2
Percentage	**26**	**11**	**6**	**3**	**20**	**23**	**6**	**5**

Table 10 shows, of the 35 responses expressing a view on the Finance theme, the most frequently cited priorities were: competitiveness of the aquaculture industry (9 - including industry, local government/planning and public sector/regulatory bodies); the use of innovation and new technology (8 – including wild fish interests, public sector/regulatory bodies and environmental protection) and access to public funds (7). A further four of the 35 highlighted the need to encourage long term investor confidence (three of these were from the aquaculture industry). Additional (other) issues raised were the filling of scientific/evidence gaps on environmental issues and contingency funding.

When considering sectoral differences, about half of wild fish interests expressed a view on this theme. Of those which did, funding for innovation and new technology was most popular. This view was shared by environmental protection. As with the other themes, aquaculture industry responses were spread across the most issues with the main areas of concern being: competitiveness, access to public sector funds and increasing investor confidence. Competitiveness of the industry was also the clear area of concern for local government/planning, in three-quarters of responses from this sector.

Issues raised across all consultation responses, ranked by how many of the 57 respondents highlighted the issue

Table 11

Rank	Issue raised	Total	Theme
1	Marine planning	31	Planning
2	Sealice	30	Health
3	Minimise/eradicate escapes	29	Containment
4	Aquaculture impact on environment and other marine users	27	Overarching
5 =	Best practice & technology for containment	23	Containment
5 =	Locational guidelines	23	Planning
7	Refocused MWGA	21	Overarching
8	Image of aquaculture	20	Marketing & Image
9 =	Aquaculture & Fisheries (Scotland) Act	18	Containment
9 =	Marine Bill	18	Planning
11	Disease control and emerging disease	17	Health
12	Inappropriate siting	16	Planning
13	Encourage long term investor confidence	13	Finance
14	Site availability	12	Planning
15	Hatcheries & disease free eggs, smolts, spat	11	Health
16 =	Tripartite Working Group	10	Health
16 =	Scottish premium	10	Marketing & Image
18 =	Control of seals and other predators	9	Containment
18 =	Competitiveness of industry	9	Finance
18 =	Developing niche markets	9	Marketing & Image
18 =	Feed sustainability	9	Marketing & Image
18 =	Industry Code of Good Practice	9	Overarching
18 =	Move to land-based facilities	9	Planning
24 =	Shellfish	8	Overarching
24 =	Relocation of farms	8	Planning
26 =	Access to private sector funds	7	Finance
26 =	Access to public sector funds	7	Finance
26 =	Innovation/new technology	7	Finance
26 =	Availability of sea lice medicines	7	Health
30 =	Traceability of escapees	6	Containment
30 =	Shellfish quality	6	Health
30 =	Promoting health benefits of fish and shellfish	6	Marketing & Image
30 =	Links to national food policy	6	Marketing & Image
30 =	Training of decision makers and resourcing	6	Overarching
30 =	Permanent planning permission	6	Planning
36	Undeveloped leases	5	Planning
37 =	Better use and sharing of facilities	4	Finance
37 =	Species diversification	4	Marketing & Image

Table 11 is a summary of every issue raised across all consultation responses, ranked by how many of the 57 respondents highlighted the issue in their response.

Thirty of the 57 respondents highlighted the pressing need for effective sea lice control measures. Wild fish interests indicated a desire for the relocation of sites away from important salmon catchments particularly freshwater sites, as well as, an acknowledgement and greater understanding of the possible effects of aquaculture on wild fisheries. This was reflected by the fact that over a half of wild fish interests' responses viewed fitness for purpose of locational guidelines and dealing with siting as the key issue. A further quarter felt either a relocation scheme should be introduced or there should be no further expansion of the industry until it could be proven that wild stocks were not being damaged.

Thirty-one of the 57 responses indicated a requirement for greater understanding of the planning process and the future role of local authorities was also highlighted, including the need for clear linkage to the Marine Bill and Marine Scotland. Responses indicated support to build on the recommendations of the Expert Group on Sites to make better use of available sites.

The issue of fish farm escapes is clearly important to stakeholders and the number of escapes must continue to be reduced through best practice, full implementation of the inspection regime under the Aquaculture and Fisheries (Scotland) Act 2007 and the review of the industry Code of Good Practice. This was reflected by 29 of all responses highlighting the need to minimise or eradicate escapes; 23 of all responses consider using best practice and technology for containing fish important and 18 of all responses raised the importance of implementing the Aquaculture and Fisheries Act.

Responses also suggested that the renewed strategic framework should clearly consider animal welfare issues including control of seals by fish farmers and wider environmental issues such as feed sustainability. It is clear that the positive image of the aquaculture industry should be promoted including the health benefits of eating fish and shellfish. This is reflected by 20 of all responses highlighting the importance of image. Improving the competitiveness of the aquaculture industry to secure markets home and abroad has also been identified as a key issue, along with support to develop the shellfish sector and for diversification into new species and markets. The importance of encouraging long-term investor confidence was raised in 13 of all responses, securing access to finance especially working capital for small business and small/medium sized enterprises (SMEs) was also highlighted, as was effective roll-out of European Fisheries Funds.

This list will help to form the development of the first action plans under the renewed framework and refocused MWGA.

Progress will be reviewed against the outcomes set for each key theme. Mechanisms for monitoring will be agreed and reviewed by the MWGA as action plans develop

Question 6: Please give your suggestions on how progress could be monitored

Table 12

Suggestions fell into 5 broad categories:

No comment/Not answered
Agree with principle set out or leave for refocused group to decide
Monitor environmental performance including data on escapes, wild fish returns, sea lice
Use comparison sites/on-site evaluations
Other

Stakeholder Category	Agree/refocused group	Environmental performance	Comparison sites	Other
Academic/scientific	1	1	0	1
Aquaculture industry	8	1	0	0
Environmental protection-other than wild fish	2	0	1	0
Local government/planning	2	1	0	0
Other	0	1	0	1
Other business/industry	0	0	0	0
Public health and food safety	1	0	0	0
Public sector/regulatory body	4	1	1	0
Recreation/tourism	0	0	0	0
Wild fish interests	0	4	2	3
Total (36)	18	9	4	5
Percentage	**50**	**25**	**11**	**14**

Table 12 shows there were just 36 respondents who commented on measuring progress. Eighteen (half) of those agreed progress should be reviewed against outcomes set for each key theme and that it should be for the refocused Ministerial Working Group on Aquaculture to agree and develop the mechanism for measuring progress. This included a majority of both industry and 4/6 public sector/regulatory body respondents.

A further nine (one quarter) suggested environmental performance indicators should be measured such as trends in numbers of fish farm escapes, sea lice numbers and wild fish returns; and four suggested on-site monitoring or the use of large and small farms as indicator comparison sites.

CONCLUSIONS

There is **broad agreement with the proposed themes and that MWGA should be refocused and have an overarching role to review progress and reprioritise actions**, with champions driving progress. Also, as well as aquaculture industry representatives, **membership** should **reflect wild fish and environmental interests.**

There was general agreement that the main issues to be tackled have been identified and should be addressed through five themes relating to:
- Health
- Planning, consents and sites
- Containment
- Markets, marketing and image
- Finance

It was also clear that once a refocused MWGA has been established action plans should be agreed along with a mechanism for measuring progress.

Responses to the consultation highlighted **clear differences across stakeholder groups** which are generally unsurprising. **Wild fish interests** were most concerned about the **impact of aquaculture on biodiversity** and the **wider environment**, particularly the impact on wild fish populations of **sea lice, fish farm escapes** and **inappropriately-sited fish farms**. These views were largely shared by those representing **environmental protection (other than wild fish) interests** who also raised concerns over the **welfare** of farmed fish, **control of fish farm predators**, particularly **seals**, and **feed sustainability.** The aquaculture **industry** highlighted the need for **fair and proportionate regulatory and licensing regimes** to be in place, access to **bigger or better sites**, availability of sealice medicines and the **ability to better compete with competitor countries**. They also highlighted the need for urgency to focus on **marketing the positive image** of the industry to **promote investor confidence** to secure long term funding of the sector.

The findings of this analysis will inform the renewed Strategic Framework for Scottish Aquaculture which is expected to be published in the first half of 2009.

ANNEXES

The Minister's pre-consultation letter to stakeholder, the full consultation document and non-confidential responses to the consultation are available on the Scottish Government website at:

Annexes of this document are:

A. Proposed Renewed Strategic Framework for Scottish Aquaculture

B. Proposed Key Themes and issues

C. List of questions posed in consultation document

D. List of organisations and stakeholder groups issued with consultation document.

E. List of (non-confidential) respondents

F. Membership of MWGA at the time of consultation

ANNEX A PROPOSED RENEWED STRATEGIC FRAMEWORK FOR SCOTTISH AQUACULTURE

Key Themes	Scottish Government's Strategic Objectives					
	Wealthier & Fairer	**Smarter**	**Healthier**	**Safer & Stronger**	**Greener**	**Desired Outcomes**
Health	Protecting valuable assets by high standards of husbandry and biosecurity to benefit all sectors	Continual development of control strategies and making best use of available medicines as well as research and development into emerging diseases	Producing health high quality safe farmed fish and shellfish backed by a modern effective food safety regime	Controlling disease to help secure a sustainable long-term future	Good strategies to help minimise discharge of medicine residues to the environment and the appropriate disposal of mortalities to limit disease spread.	A secure long-term future for the industry by protecting the asset through adoption of disease control strategies which also contribute to minimising impacts on the environment
Planning Consents & Sites	Develop plans to make optimal use of the space available to grow fish and shellfish through open and transparent processes	Develop and retain skilled, knowledgeable and trained decision-makers and workforce	Sites located to ensure optimum production of high-quality, safe farmed fish and shellfish	Certainty and clarity going forward, underpinning downstream activities and benefits to local communities	The right sites in the right places permitted through streamlined and proportionate regulation/processes to ensure reduced impacts on other species and users of the marine and freshwater environment	Development of the right sites in the right places by the right people through transparent, streamlined and proportionate regulation/processes to minimise impacts on other users of the marine and freshwater environment

Key Themes	Scottish Government's Strategic Objectives					
	Wealthier & Fairer	**Smarter**	**Healthier**	**Safer & Stronger**	**Greener**	**Desired Outcomes**
Containment	Retaining stock within farm premises to increase profitability whilst preventing conflict with others' interests	Adopting best practice and technologies through continuous improvement to prevent fish farm escapes	Secure facilities producing high quality healthy fish	Reducing stock loss to help secure a long term future and improve reputation and credibility of the industry at the same time protecting wild fisheries and tourism	Potential detrimental effects on wild fish stocks reduced	Fish farm escapes minimised by adopting best-practice to reduce stock loss, improve profitability and secure the future and credibility of the industry whilst minimising environmental impact and preventing conflict with others' interests.
Markets, Marketing & Image	Maximising profitability by promoting a positive image of the industry and making best use of the Scottish quality brand to secure markets home and abroad	Ensure favourable conditions for both commodity and niche market production and better integration with transport and processing infrastructure	Promoting the health and nutritional benefits of farmed fish and shellfish	Strong industry with a strong brand through well-established markets	Reduced food miles by encouraging the consumption offish and shellfish as close as practical to place of production	Maximised profitability for commodity and niche market producers by promotion of a positive image of the industry and making best use of the Scottish quality brand to secure markets home and abroad
Finance	Develop a climate to encourage investment, supporting and underpinning the long term future and competitiveness of the sector	Incentivise the industry to maximise best use of technology and resources to make aquaculture attractive to investors	Producing high quality, safe, and nutritious farmed fish and shellfish	Securing finance to support the long term stability and development of the industry	Invest in best practice and technologies to minimise impacts on the environment	An investment climate which supports and underpins the long-term future and competitiveness of the sector with investment in best practice and technologies to minimise impacts on the environment

ANNEX B KEY ISSUES AS SET OUT IN CONSULTATION DOCUMENT

HEALTH

Desired outcome: A secure long-term future for the industry by protecting the asset through adoption of disease-control strategies which also contribute to minimising impacts on the environment

Issues identified by stakeholders	**Desired outcome**
Integrated sea lice control strategies	Effective control of sea lice/implementation of Aquaculture & Fisheries Act
Tripartite Working Group (TWG)	TWG refocused on local delivery of agreements between farmed and wild fish interest
Hatcheries/production of disease free smolts, eggs and spat	Secure the retention of viable fin-fish and shellfish hatcheries in Scotland
Shellfish quality and public health	Establishment of improved controls and testing mechanisms
Waste management	Robust arrangements for disposal of waste and mortalities
Aquatic animal health Directive	Directive transposed and fully implemented
Fish and shellfish disease control including emerging diseases	Effective control strategies for fish and shellfish diseases including efficient identification of emerging diseases

PLANNING, CONSENTS AND SITES

Desired outcome: Development of the right sites in the right places by the right people through transparent, streamlined and proportionate regulation/processes to minimise impacts on other users of the marine and freshwater environment

Issues identified by stakeholders	**Desired outcome**
Improved availability of sites for expansion and rationalisation	Aquaculture plans, in the context of marine plans, which provide clear indication of where aquaculture development may be able to take place for both shellfish and finfish production
Large numbers of undeveloped leases	Maximised use of available sites where appropriate
Fitness for purpose of locational guidelines	Clear guidance for environmental quality, disease control and landscape
Simplification of procedures and links with Marine Bill and SMMO	Clear indication of how aquaculture will be dealt with in marine planning

CONTAINMENT

Desired outcome: Fish farm escapes minimised by adopting best-practice to reduce stock loss, improve profitability and secure the future and credibility of the industry whilst minimising environmental impact and preventing conflict with others' interests.

Issues identified by stakeholders	**Desired outcome**
Escapes of fish from farms	Escapes caused by poor operational procedures, storm damage and predators minimised
Full implementation of Aquaculture and Fisheries (Scotland) Act 2007	Transparent and fair inspection regime in place. Fish farm escapes minimised and correct operational procedures in place.
Utilisation of best practice and technology	Industry using the best appropriate equipment for containment. The industry code of good practice evolving to reflect current best practice and is followed
Contingency planning for escapes	Robust plans are in place and impacts are minimised
Source of escaped fish	Methods put in place to aid with traceability of escaped fish

MARKETS, MARKETING and IMAGE

Desired outcome: Maximised profitability for both commodity and niche market producers by promotion of a positive image of the industry and making best use of the Scottish quality brand to secure markets home and abroad

Issues identified by stakeholders	**Desired outcome**
Image of the aquaculture industry	Better public awareness, acceptance and understanding of aquaculture industry
Aquaculture as a viable career	Aquaculture recognised as a rewarding career
Structure of the industry and link to supply chains	Planned access to processing and markets in UK and overseas
Securing the Scottish premium and developing niche markets	Scottish aquaculture products recognised as top quality particularly those from small-scale specialist producers
Loss of Minimum Import Price for farmed salmon	A secure industry in Scotland
Need to diversify in aquaculture, new species and new markets	Strategy for diversification in place which is advised by recognised experts and informed by developments in technology and climate change agenda
Feed sustainability	Feed to be derived from sustainable sources

FINANCE

Desired outcome: An investment climate which supports and underpins the long-term future and competitiveness of the sector with investment in best practice and technologies to minimise impacts on the environment

Issues identified by stakeholders	**Desired outcome**
Competitiveness of Scotland with other aquaculture-producing countries	Scottish aquaculture shown to be competitive within each market area
Long-term investor confidence	An industry that is recognised as a good investment opportunity
Lack of private sector funding	More private sector funding available, encouraged by government and investor confidence
Lack of public sector funding	Best use of available public funding for the benefit of the whole industry within the confines of state aids
Support for innovation and new technologies	Partnerships between Government, academia and industry
More efficient use of facilities	Create opportunities for shared facilities (depuration, processing, marketing, deliveries) for small businesses

ANNEX C QUESTIONS POSED IN CONSULTATION

1. The proposed Strategic Framework suggests a way forward for Scottish aquaculture. The Ministerial Working Group on Aquaculture will have an over-arching role across the five themes, to review progress, reprioritise planned actions and to deal with emerging issues as appropriate. Priority actions will be reassessed and agreed at each meeting and a champion for each of the five themes will be responsible for reporting back to the MWGA. Do you agree, in principle, with this proposed way of working?

2. The *Strategic Framework for Scottish Aquaculture* is based on the five **key themes** of; Health; Planning, Consents and Sites,; Containment; Markets, Marketing and Image and Finance. Do you agree that the 'five **themes** approach' proposed in this Framework is sufficiently flexible to accommodate new and emerging issues?

3. The main **issues** raised by stakeholders during the pre-consultation exercise have been marshalled into five key themes and set out in this document. Do you agree that the main **issues** to be addressed have been identified in this draft Strategic Framework?

4. **Desired outcomes** for each of the **issues** identified within each key theme are also set out in this document. Do you agree with the proposed **desired outcomes**?

5. What do you think is the priority **issue** for each of the key themes, as described in this document? Please highlight only **one** issue per theme:
Health; Planning Consents and Sites; Containment; Markets, Marketing and Image; **Finance**

6. Progress will be reviewed against the outcomes set for each key theme. Mechanisms for monitoring will be agreed and reviewed by the MWGA as action plans develop. Please give your suggestions on how progress could be monitored.

7. Please indicate **the main** sector or stakeholder group to which you belong or which you represent as a respondent to this consultation. Select only **one** of the following options:

1.	Aquaculture industry
2.	Other business/industry
3.	Local government/planning
4.	Recreation/tourism
5.	Public sector/regulatory body
6.	Wild fish interests
7.	Environmental protection (other than wild fish)
8.	Academic/scientific
9.	Public health and food safety
10.	Community interests
11.	Other: Please specify:

ANNEX D ORGANISATIONS AND STAKEHOLDER GROUPS INCLUDED IN CONSULTATION

All organisations and groups listed below were issued with the consultation document.

Advocates for Animals
Aquaculture Health Joint Working Group
Association of Salmon Fishery Boards
Association of Scottish Shellfish Growers
Atlantic Salmon Trust
British Marine Finfish Association
British Retail Consortium
British Trout Association
Commission for Racial Equality
Committee of Scottish Clearing Bankers
Confederation of Scottish Local Authorities
The Crown Estate
Dept for Environment, Fisheries and Rural Affairs
Dept of Agriculture and Rural Development, NI
Disability Rights Commission
Equal Opportunities Commission
European Commission, DG Mare
European Parliament, Fisheries Committee
European Parliament, Economic and Social committee
EU Salmon Producers' Group
Federation of Scottish Aquaculture Producers
Fish Vet Group
Fisheries Research Services – Marine Laboratory
Fisheries Research Services – Freshwater laboratory
Food Standards Agency Scotland
the French Embassy in London, Agricultural Counsellor
French Ministry of Agriculture
French Ministry of Transport (Marine Affairs)
Freshwater Fisheries Forum Steering Group
Highlands and Islands Enterprise
Legal deposit libraries
Loch Awe Improvement Association
Marine Conservation Society
North Atlantic Fisheries College
North Atlantic Salmon Conservation Organisation
Northern Lighthouse Board
Rivers and Fisheries Trusts of Scotland
Royal Society for the Protection of Birds, Scotland
all Salmon Fishery Boards in Scotland
Scotland Food and Drink
Scottish Anglers' National Association
Scottish Aquaculture Research Forum
Scottish Association of Marine Science
Scottish Enterprise
Scottish Environment LINK
Scottish Environment Protection Agency
Scottish Food Advisory Committee
Scottish Ministers

Scottish Natural Heritage
Scottish Parliament
Scottish Salmon Producers' Organisation
Scottish Society for the Prevention of Cruelty to Animals
all 32 Scottish Local Authorities
all Scottish MEPs
all registered Scottish Finfish farming businesses
all registered Scottish Shellfish farming businesses
Sea Fish Industry Authority
Seafood Shetland
Shetland Aquaculture
Tripartite Working Group
University of Stirling, Institute of Aquaculture
Visit Scotland

ANNEX E LIST OF (NON-CONFIDENTIAL) RESPONDENTS

Advocates for Animals
Animal Concern/Save Our Seals Fund
Argyll and Bute Council
Association of Salmon Fishery Boards/Rivers and Fisheries Trusts of Scotland
Atlantic Salmon Trust
British Trout Association
Caithness District Salmon Fishery Board
Callander McDowell
Comhairle nan Eilean Siar
Fish Veterinary Society
Fleming Homestead Ltd
Food Standards Agency Scotland/Scottish Food Advisory Committee
Highland Council
Highlands and Islands Enterprise
Institute of Aquaculture, University of Stirling
Inverness College UHI
Loch Awe Improvement Association
Lochaber District Salmon Fishery Board
Marine Harvest Scotland Ltd
Ness District Salmon Fishery Board
North-Ayrshire Council
Northern Lighthouse Board
Orkney Trout Fishing Association
Royal Town Planning Institute in Scotland
RSPB Scotland
Royal Yachting Association Scotland
Scottish Association of Marine Science
Sea Trout Group/Scottish Anglers' National Association
Scottish Environment Link
Scottish Environment Protection Agency
Scottish Government Water Pollution Control Team
Scottish Natural Heritage
Seafish Industry Authority
Seafood Shetland
Shetland Aquaculture
Shetland Islands Council
Scottish Salmon Producers' Organisation
The Crown Estate
The European Salmon Producers' Group
Train Shetland
West Dunbartonshire Council
Dundas and Wilson CS LLP
Federation of Scottish Aquaculture Producers
David Basford
Paul Finnegan
Bjorn Myrseth
Walter Speirs
Murray C Stark
D C Wilson

ANNEX F MINISTERIAL WORKING GROUP ON AQUACULTURE MEMBERSHIP AT THE TIME OF THE CONSULTATION

Chair
Michael Russell, Minister For Environment

Members
Association of Salmon Fishery Boards
Association of Scottish Shellfish Growers
British Retail Consortium (represented by M&S)
British Trout Association
Committee of Scottish Clearing Bankers
Confederation of Scottish Local Authorities
Federation of Scottish Aquaculture Producers
Fish Vet Group
Food Standards Agency Scotland
Highlands and Islands Enterprise
Scottish Association of Marine Science
Scottish Environment LINK (represented by RSPB & Marine Conservation Society)
Scottish Environment Protection Agency (SEPA)
Scottish Natural Heritage
Scottish Salmon Producers' Organisation
Sea Fish Industry Authority
The Crown Estate

Secretariat
Scottish Government Marine Directorate
Fisheries Research Services
SEPA