

**From:** [Sinclair, Douglas](#)  
**To:** ["George.Burgess@gov.scot"](mailto:George.Burgess@gov.scot); [Rosie, Andy](#)  
**Cc:** [Neil.Ritchie@gov.scot](mailto:Neil.Ritchie@gov.scot)  
**Subject:** RE: URGENT: Scott Landsburgh SSPO  
**Date:** 25 August 2016 15:40:29

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Hi George

I was asked recently about Norway's plans wrt to Slice and a possible phase out but I can find no evidence of this at all, I am sure that if there were firm plans and these were in train then the sector related media would be alive with the story and it isn't.

I am aware in the last year or two concerns in the Norwegian media regarding the other systemic sea louse medicines called Calicide or Ektobann based on the active ingredient teflubenzuron. These stories reported residues being found following use of this product on Norwegian farms but even in that case I don't think there has been any move to ban or withdraw the substance/product.

As to the wider issue in the e-mail chain below, SEPA has not sought to issue a pro-active press release on the Slice issue and as Andy says, we have held discussions with the owners of the product wrt the options for further research.

Happy to provide more information as required, Andy is not available but I am in the office until 5-ish if you need to discuss.

Best regards

**Douglas Sinclair**  
Specialist I (Aquaculture)  
SEPA Orkney Office  
Norlantic House  
KIRKWALL  
Orkney  
KW15 1GR

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I no longer work on Mondays, normally available Tuesday - Friday.  
[During absences from the office, my e-mails may be read and you may receive a response from Anne Mitchell, Senior Admin Officer in the SEPA Orkney Office.](#)

 **Consider the environment. Please don't print this e-mail unless you really need to.**

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**From:** [George.Burgess@gov.scot](mailto:George.Burgess@gov.scot) [mailto:[George.Burgess@gov.scot](mailto:George.Burgess@gov.scot)]  
**Sent:** 25 August 2016 14:15  
**To:** Rosie, Andy; Sinclair, Douglas  
**Cc:** [Neil.Ritchie@gov.scot](mailto:Neil.Ritchie@gov.scot)

**Subject:** RE: URGENT: Scott Landsburgh SSPO

Andy

Thanks. The only "live" query for now is re the Norwegian position on Slice.

George

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**From:** Rosie, Andy [<mailto:andy.rosie@sepa.org.uk>]  
**Sent:** 25 August 2016 14:13  
**To:** Burgess WG (George); Sinclair, Douglas  
**Cc:** Ritchie N (Neil)  
**Subject:** RE: URGENT: Scott Landsburgh SSPO

Hi George,

Douglas Sinclair will be in touch later this afternoon with more detail.

Our draft release was not used, and it will not be used in its present form.

We've been in contact with manufacturers Merck and they propose some further investigations.

It remains to be seen if they can shed more light on the issues flagged up by the SARF report.

I'm not aware of any plans by Norway to phase Slice out, but Douglas will respond on this also.

Best regards,

**Andy**

Andy Rosie,  
Head of SEPA's Sector Team  
SEPA Dingwall Office,  
Graesser House, Fodderty Way, Dingwall, IV15 9XB  
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**From:** [George.Burgess@gov.scot](mailto:George.Burgess@gov.scot) [<mailto:George.Burgess@gov.scot>]  
**Sent:** 25 August 2016 13:21  
**To:** Rosie, Andy; Sinclair, Douglas  
**Cc:** [Neil.Ritchie@gov.scot](mailto:Neil.Ritchie@gov.scot)  
**Subject:** RE: URGENT: Scott Landsburgh SSPO

Andy, Douglas

Can you help on this please?

**W George Burgess**  
Environmental Quality Division  
Scottish Government  
Victoria Quay  
Edinburgh  
EH6 6QQ

0131 244 0240  
25 Aug 2016

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**From:** Mitchell A (Alastair)  
**Sent:** 25 August 2016 11:55  
**To:** Ritchie N (Neil); Cowan WJ (Willie)  
**Cc:** Burgess WG (George)  
**Subject:** RE: URGENT: Scott Landsburgh SSPO

Neil – thanks. Not sure I agree entirely but, regardless, we need to get a further answer up. Those best placed would initially be SEPA themselves – Andy Rosie and Douglas Sinclair have been over in Norway a couple of times in the last few years, liaising and learning from their equivalents there on specialist aquaculture environmental protection matters such as this. I'd imagine they will also have readily accessible Norwegian contacts.

To get things moving, can I suggest the Cabinet Secretary's message is passed back to SEPA (presume they drafted much of your response?) with a request that they get in touch with us here with their written further understanding and we'll lead on crafting a further response?

Regards, Alastair

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**From:** Ritchie N (Neil)  
**Sent:** 24 August 2016 17:23  
**To:** Mitchell A (Alastair); Cowan WJ (Willie)  
**Cc:** Burgess WG (George)  
**Subject:** FW: URGENT: Scott Landsburgh SSPO

Alastair/ Willie – can I leave this back with you as its more an industry question than an environmental/ regulatory question. Neil

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**From:** Cabinet Secretary for the Environment, Climate Change and Land Reform  
**Sent:** 24 August 2016 17:15  
**To:** Ritchie N (Neil); Smith K (Kate)  
**Cc:** Mitchell A (Alastair); Higgins K (Kate); Miller D (David); Director of Marine Scotland Mailbox; Cowan WJ (Willie); Haddon P (Paul); Barber J (Jill); Burgess WG (George)  
**Subject:** Re: URGENT: Scott Landsburgh SSPO

Neil,

Thanks for this. Ms Cunningham has commented that it doesn't really provide much more in the way of detail than the original note. She has asked if we have information on the Norway question she posed previously.

David

Sent from my BlackBerry 10 smartphone on the EE network.

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**From:** Ritchie N (Neil)

**Sent:** Wednesday, 10 August 2016 14:39

**To:** Cabinet Secretary for the Environment, Climate Change and Land Reform; Smith K (Kate)

**Cc:** Mitchell A (Alastair); Higgins K (Kate); Miller D (David); Director of Marine Scotland Mailbox; Cowan WJ (Willie); Haddon P (Paul); Barber J (Jill); Burgess WG (George)

**Subject:** RE: URGENT: Scott Landsburgh SSPO

David

As trailed earlier the following is briefing SEPA has provided to respond to the Cabinet secretary's questions with some further background and an explanation of next steps.

### **Regulation by SEPA of the use of the sea louse medicine SLICE by Scottish fish farms**

#### **Briefing for Cabinet Secretary 10 August 2016**

There are a number of methods of controlling sea lice in marine fish-farms, including the use of authorised medicines either as a bath, or an in-feed treatment such as Emamectin Benzoate (the active ingredient in SLICE). The use of these treatments is regulated by SEPA through fish farm licence conditions, set using the best available evidence, with the aim of ensuring that the residues in the environment are within independently derived safe environmental standards and environmental impacts are within acceptable levels.

Monitoring has generally not shown significant impacts on marine animals in the wider marine environment, but SEPA is aware of anecdotal claims that sea louse treatments might be having an unexpected adverse environmental impact at this scale. In response, SEPA has undertaken a more detailed study into the seabed in the Shuna Sound area, in which there are a number of fish farms which have used in-feed sea louse treatments. This study has confirmed a more extensive spread within the marine environment of low levels of the residues arising from the use of the sea louse treatment Slice, than had been expected when the medicine was first authorised, or had been predicted by detailed modelling.

SEPA also invited the Scottish Aquaculture Research Forum (SARF) to commission research to determine whether there is compelling evidence of the environmental impacts suggested by the anecdotal claims. This analysis identified a subtle but detectable, and unexpected, association between impact on the marine environment and the use of Slice.

SEPA is also aware, and are concerned, that in many cases the frequency and dose of Slice treatments have regularly exceeded what was expected when the current licence framework was developed. The new treatment patterns may reflect the fact that the treatment is becoming less effective, probably as sea lice become more resistant to the medicine.

In response to this new evidence, SEPA is intending to change the way in which SLICE is permitted, tightening restrictions on the use of the medicine. These arrangements will be continually monitored and reviewed. At the same time, the sector will carry out further research to confirm or confound the apparent link between SLICE and possible environmental effects. SEPA, itself, will also be undertaking further analysis and monitoring. The priority over will be to agree long-term viable solutions to sea lice. This will focus on a number of possible solutions and, depending on the additional research and analysis, could involve the phasing out of SLICE.

The next steps will be a good example of how SEPA's new Regulatory Strategy will be implemented.

We have informed fish farm operators of SEPA's views. We are working in partnership with the industry, including the Scottish Aquaculture Innovation Centre (which Scottish Government has supported with £11m over 5 years, to be match-funded by the industry), to explore the potential for the development of alternative means of controlling sea lice, which minimise the risk to our marine environment. The challenge of controlling sea lice in fish farms is not unique to Scotland, and the development of alternative means represents an opportunity for Scotland's aquaculture sector.

Alternative medicinal treatments are a matter for SEPA/Veterinary Medicines Directorate (VMD) in DEFRA. A new in-feed treatment is being trialled elsewhere, although SEPA does have concerns about its impact and is wary of allowing a trial in Scotland. In reality, whilst biological solutions such as cleaner-fish, and mechanical ones such as thermolicers, are now beginning to be mainstreamed, medicinal back-up is still required and SLICE is one of the very limited options, alongside hydrogen peroxide. The industry is also exploring an improved operating model which designs out much of the sea lice issue at first principles by moving to higher energy waters and utilising larger smolts which reduce the marine phase of the salmon's life and consequently reduces the potential for disease, and sea lice and interaction with wild fish.

The SEPA Chief Executive is strongly involved in these discussions with CEOs in the sector. This high-level engagement will continue to ensure the proper management of SLICE and momentum is maintained to develop alternative methods of controlling sea lice.

The SARF report has been published today. Neither SEPA nor the industry are proposing to undertake proactive communications at this stage, but SEPA has prepared for possible enquiries around the subject once the report is published. SEPA will include reference to its decision in its next Chief Executive's report to the Agency Board, on 26 September.

Neil Ritchie  
Environmental Quality Division  
Scottish Government  
0131 244 7250

[Neil.ritchie@gov.scot](mailto:Neil.ritchie@gov.scot)

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**From:** Ritchie N (Neil)  
**Sent:** 10 August 2016 12:28

**To:** Cabinet Secretary for the Environment, Climate Change and Land Reform; Smith K (Kate)  
**Cc:** Mitchell A (Alastair); Higgins K (Kate); Miller D (David); Director of Marine Scotland Mailbox;  
Cowan WJ (Willie); Haddon P (Paul); Barber J (Jill); Burgess WG (George)  
**Subject:** RE: URGENT: Scott Landsburgh SSPO

David

SEPA are providing us with a note on some of the Cabinet Secretary's question which we will pass on as soon as it is received (which is expected to be shortly). However following our discussions last night and his subsequent reflection has been that SEPA will not issue an article along the lines that had been initially proposed and will hold reactive lines if approached. They are continuing to be in dialogue with SSPO.

Neil

Neil Ritchie  
Environmental Quality Division  
Scottish Government  
0131 244 7250

[Neil.ritchie@gov.scot](mailto:Neil.ritchie@gov.scot)

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**From:** Johnston DM (David) **On Behalf Of** Cabinet Secretary for the Environment, Climate Change and Land Reform  
**Sent:** 09 August 2016 17:14  
**To:** Smith K (Kate); Cabinet Secretary for the Environment, Climate Change and Land Reform  
**Cc:** Mitchell A (Alastair); Higgins K (Kate); Miller D (David); Director of Marine Scotland Mailbox;  
Cowan WJ (Willie); Ritchie N (Neil); Haddon P (Paul); Barber J (Jill)  
**Subject:** URGENT: Scott Landsburgh SSPO

Kate,

We have flagged this up with Ms Cunningham, who would be content to speak to Terry A'Hearn tomorrow morning (although we are struggling to get in contact with his office to confirm a time).

Ms Cunningham has some questions about the press statement:

The draft release is silent about what the industry is expected to do as an alternative – would have expected to see something about how industry will be supported in consequence of this change – is there anything that can be added in that regard?

Ms Cunningham also recalls being told recently that Norway is also phasing this out – is this correct? If so, do they have alternatives in place and any evidence about their efficacy?

Is there any time pressure for this release? Does it have to go tomorrow?

Thanks,

David

David Johnston | PS to Cabinet Secretary for Environment, Land Reform and Climate Change |  
2N.08 | St Andrews House | Edinburgh | EH3 1DG | T: 0131 244 1556

[cabsecECCLR@gov.scot](mailto:cabsecECCLR@gov.scot)

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**From:** Smith K (Kate)  
**Sent:** 09 August 2016 13:56  
**To:** Cabinet Secretary for the Environment, Climate Change and Land Reform  
**Cc:** Mitchell A (Alastair); Higgins K (Kate); Miller D (David); Director of Marine Scotland Mailbox;  
Cowan WJ (Willie); Ritchie N (Neil); Haddon P (Paul); Barber J (Jill)  
**Subject:** Scott Landsburgh SSPO

## **PS/ Cabinet Secretary for the Environment, Climate Change and Land Reform**

### **Scottish Salmon Producers Organisation – concerns relating to SEPA press release about potential sea lice treatment (Slice) withdrawal following SARF report**

<< File: SLICE story - 5 Aug 2016.docx >> << Message: FW: Original Call for Proposals SARF098 >>

Serious concerns have been raised today by the Scottish Salmon Producers Organisation (SSPO) in relation to a draft SEPA statement in response to the publication (tomorrow Wed 10<sup>th</sup> August) of a SARF report (SARF098) which suggests that there are detrimental impacts on the environment from the use of a sea lice chemical treatment – Slice.

The draft SEPA statement is attached and provides further information. The original call for proposals by SARF for the SARF 098 project is also attached. There has been engagement following the initial conclusions of the SARF report between SEPA and industry and concerns over the long term use of Slice have been raised. The industry are however, now particularly concerned about the line which states;

***We have informed fish farm operators of SEPA's position that, unless we see new and compelling evidence to support continued use, the ability to use Slice is likely to be phased out in 2018.***

Scott Landsburgh (CEO of the Scottish Salmon Producers Organisation) has contacted Terry A'Hearn, Chief Executive of SEPA, requesting an urgent conversation. He would also like to bring this to the attention of the Cabinet Secretary urgently.

We would advise that the Cabinet Secretary discuss this issue further with Terry A'Hearn regarding handling and prior to any conversation with Mr Landsburgh, as this relates directly to SEPA activities and particularly to the proposed press release which the SSPO would like to see amended before its release (due tomorrow).

Contact details for Terry A'Hearn are 01786 457701 or  
[Terry.A'Hearn@sepa.org.uk](mailto:Terry.A'Hearn@sepa.org.uk)

Happy to discuss further if required.

Regards,  
Kate

**KATE SMITH**

Aquaculture Health and Welfare  
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Web: <http://www.scotland.gov.uk/marinescotland>  
Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ

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Aquaculture Europe - Edinburgh  
Food For Thought  
20-23 September 2016  
<http://www.gov.scot/Resource/0043/00433571.pdf>

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