

Our Ref: JCC/kac/SSPO/  
130304  
Your Ref:

Mr Phil Thomas  
Chairman  
Scottish Salmon Producers' Organisation  
Durn,  
Isla Road,  
Perth PH2 7HG

4 March 2013

Dear Phil

Thank you for your letter of 15 February regarding the issue of mortalities at fish farms and the data collected by SEPA. This issue has recently been accorded prominence in the media and I understand your concerns.

Following our meeting in Edinburgh, this matter has now been discussed by relevant groups within SEPA. The majority of licenses authorising fish farms issued by SEPA do not include a requirement for the provision of data on numbers of mortalities, however a small number based on an older version of the licence template do. Given that a small number of licences have this requirement and the usefulness of the data, it was concluded that farmers be asked to make such returns to SEPA on a voluntary basis unless they are obliged to do so by conditions of the authorisation for a particular site. To make this clear to operators, in the Returns Spreadsheet supplied to farmers by SEPA the column containing numbers of mortalities has been re-labelled thus: *"Number of Fish - This entry is voluntary, unless required by the site's CAR licence."*

I understand that you may also be concerned by the appearance in Scotland's Aquaculture Database of data on the numbers of fish mortalities at finfish farms, as a result of these data being transferred from SEPA's fish farm database. Although numbers of mortalities do appear in the current version of Scotland's Aquaculture Database which is being launched to partner organisations soon, it is our intention to make a small change to ensure that these data on the numbers of mortalities are not included in the version released to the public.

I understand your point regarding competitive disadvantage. If, however, you assert that numbers of morts may be useful for competing companies beyond the information provided in data on the weight of mortalities, it demonstrates that information on numbers of mortalities gives added value beyond data on weights alone. The collection of data on mortalities is used by SEPA for a variety of purposes including assisting the auditing of the performance of fish farms against the limits set in authorisations. In this regard, in most circumstances the mass of dead fish arising at a site is vital information but the inclusion of numbers of mortalities may also be useful. For example, if there is a suspicion that data returns made to SEPA have been falsified in order to demonstrate compliance, an ability to check numbers of mortalities provides an additional means of auditing the submitted data.

.../cntd



Chairman  
David Sigsworth  
  
Chief Executive  
James Curran

Corporate Office  
Erskine Court, Castle Business Park,  
Stirling, FK9 4TR  
tel 01786 457700 fax 01786 446885  
[www.sepa.org.uk](http://www.sepa.org.uk)

Page 2

4 March 2013

Mr Phil Thomas  
SSPO  
Perth

However, SEPA has acknowledged, through the removal of the requirement from the more recent template, that this data is not always essential. Should operators wish to amend any element of a licence they can, of course, apply for a variation at any time.

These new arrangements will ensure that, should an operator have a particular issue with SEPA's collection of data on the numbers of dead fish, they can omit such data – unless its provision is required in the licence for a particular site. Similarly, where mortality numbers have been omitted, if SEPA has a concern with the operation of a site or the veracity of submitted returns, the Agency will be able to require the provision of such data through the imposition of a Notice or through the use of SEPA's wider powers.

I hope you find the above information helpful. If you would like to discuss any of these issues further, please don't hesitate to let me know.

Yours sincerely

**James Curran**  
**Chief Executive**