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BRIA Business Interview- GRIEG SEAFOOD

Q1. Briefly describe your business objectives

Salmon farming company. Grow salmon from egg to freshwater stage and on to salt water stage. Harvest and primary process the salmon. Wholly owned subsidiary- Grieg Seafood ASA, stock listed company on Oslo BORS stock exchange. Classified as large (not SME).

Q2. Do you agree with the objectives of the SIRMP?

Yes

Benefits of Implementing the Different Options

Q3. Do you agree/disagree with the suggested benefits as an outcome of implementing each of the three options?

Agree

Q4. Are there any further potential benefits of each option to your business/sector?

Costs of Implementing Options 1 & 2

Q5. Do you agree/disagree with the costs associated with implementing option 1?

Agree-this option is not viable

Q6. Do you agree/disagree with the costs associated with implementing option 2?

Not viable option

Costs of Implementing Option 3

Q7. Do you agree/disagree with the cost assessment of the new/amended policies within the SIRMP as detailed in **Table 1**?

[spoken further under each policy questions]

Q8. Are you in favour of implementing the SIRMP and the policies within it?

Only viable option- good it gives clarity on development options but potentially could create a plan with very little viable option for development.

On the whole it's a good thing, it's going to help developers.

Agree on the whole as a package but could be restricting us even further. Lot of new SACs etc limiting areas for development.

We have to work together with everyone -other marine users which we have always done and are happy to and is doable, it is just adding more restriction.

In principle supportive, just nervous that the Plan will be used to restrict develop.

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Should look at best environmental, social and economic balances within an area. Should be a hierarchy of payback (Sullom Voe an example). [Rachel "NMP has policy of protecting fishing and we have to comply with these higher level policies (Sullom Voe example) but do understand that it can be frustrating"]

Could help to unlock synergies between developers. Match algae farming with salmon farming etc. Work together to get greater environmental, social and economic outputs.

Q9. Can you foresee any specific positive/negative impacts to your business resulting from the implementation of the SIRMP?

[covered in the answer to Q8]

Amended Policy-Waste Minimisation (Pg 28 SIRMP)

See Table 2: Amended and new policies

Q10. Do you currently consider waste minimisation as part of the EIA process?

Yes

Q11. Do you create waste minimisation plans in-house? What does it entail? How many man hours does it take?

Yes-

Policy is a companywide operational procedure, fairly standard, doesn't take too long

Q12. Do you currently have written waste management procedures?

Yes

Q13. Can you foresee any other costs that could be associated with the amended policy?

In-line with what we currently provide, would be a min amount of extra work.

Amended Policy- Safeguarding Navigation Channels and Port Areas (Pg 32 SIRMP)

See Table 2: Amended and new policies

Q14. Are you likely to submit an application for a development adjacent to a port/harbour area?

Yes- potentially. In the past in Whalsay and areas in Skye.

Q15. Do you envisage that this policy would cause you any economic impact on your business?

The wording of this policy could mean we cannot extend our site in Whalsay. May need to undertake carbon footprint analysis?

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Concern over the wording of the last sentence of the policy. Who decides if a development would restrict the future expansion of a port/harbour? May give SIC a blanket reason to refuse development. Would like the word 'reasonable' or 'demonstratable' to be added in to the last sentence. To demonstrate that the SIC has given a justified reason to refuse development.

There are sites in Skye that we wouldn't have been able to get if this policy was implemented there. Worried that other regional areas may use our plan as a template and role out these policies. This could restrict development in our other areas so it is important to make sure the wording is correct.

[Rachel- may just need to quantify it. May not be refused. Harbour master would decide]

Q16. Do you think this policy would have a greater impact on the development potential around smaller ports/harbours?

Depends on how the Harbour Master applies things and their perception of risk/vision of a channel area/ safe harbour. We would never look to put a site in a navigation channel.

Amended Policy- Safeguarding Marine Recreation (Pg 94 SIRMP)

See Table 2: Amended and new policies

Q17. Do you think your business/development type could be impacted by the amendment to the wording of this policy?

Looking to change- moving into deeper water- more access to shoreline, so what we create would be beneficial.

Don't foresee any risk here. Happy for people to use fish farm areas and access points for recreation.

New Policy- Harbour Plans (Pg 32 SIRMP)

See Table 2: Amended and new policies

It has always been a requirement that developers comply with specific harbour plans, policies, directions and by-laws, this policy has been included to add clarity and consistency.

Q18. Can you foresee any additional impacts associated with the inclusion of this new policy into the SIRMP?

If 'Yes', please give details of any potential impacts and associated costs.

Concern over wording 'adjacent' and how that is defined. Does the word need to be in there? Policy creep?

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[Rachel suggested that Grieg submit a formal response to the SIRMP consultation to allow us to actively investigate policy changes.]

New Policy- Habitat Protected Areas (Pg 49 SIRMP)

See Table 2: Amended and new policies

This policy gives protection to areas closed to fishing by the SSMO (which have been closed to protect PMFs). There is overlap between this policy and policy MP SPCON4 which protects Priority Marine Features.

Q19. Can you foresee any additional impacts associated with the inclusion of this new policy into the SIRMP?

If 'Yes', please give details of any potential impacts and associated costs.

Ok with this. Need to be careful, as find sea pens and maerl can be found under anchoring points as these areas cannot be dredged.

In favour but how much of seabed has horse mussels?

Not a huge issue as need to comply with PMF policy

[Rachel clarifies that it has to be defined as a bed not just single horse mussels. We will look at clarifying policy to cover sites present as of 2019]

New Policy- Decommissioning of Assets (Pg 100 SIRMP)

See Table 2: Amended and new policies

Q20. Do you agree/disagree with the inclusion of this policy?

Yes- already something we do

Q21. Have you ever had to create a decommissioning plan?

No official plan but is included in EIA. All infrastructure is removed when site is finished. Biggest problem in sector is onshore infrastructure not being cleaned up. Equipment gets lost and removed from asset register when companies take over sites that have gone into administration.

Q22. If you were directed to create a decommissioning plan, how easy would it be for you to compile the necessary information?

Already add this into EIA so minimal extra work

Q23. Please give an estimate of the man hours it takes to create a decommissioning plan

Minimal

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New Policy- Development Restricted Areas (Pg 101SIRMP)

See Table 2: Amended and new policies

Q24. Would you be likely to submit an application within a development restricted area?

No

Q25. Aquaculture isn't currently allowed within these areas; do you agree with this policy or does it restrict your business development (for example expansion into seaweed farming)?

Not an issue for us.

Competition Assessment

Q26. Do you think that the SIRMP could directly or indirectly limit the number or range of suppliers?

No

Q27. Do you think that the SIRMP would limit the ability of suppliers to compete?

No

Q28. Do you think that the SIRMP would limit the suppliers' incentives to compete vigorously?

No

Q29. Do you think that the SIRMP policies could limit the choices and information available to consumers?

No

Consumer Assessment

Q30. Do you think the policies within the SIRMP will have an effect on the quality, availability or price of any goods or services in a market?

Don't know. Depends on how the Plan is adopted and implemented. If reduced supply this may have an impact.

Q31. Do you think the policies within the SIRMP will have an effect on the essential services market, such as energy and water?

No

Q32. Do you foresee that the SIRMP would involve storage or increased use of consumer data?

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No

Q33. Do you think that the SIRMP would increase opportunities for unscrupulous suppliers to target consumers?

No

Q34. Do you think the SIRMP would impact the information available to consumers on either goods or services, or their rights in relation to these?

Yes- but only in a positive way.

Q35. Do you think the SIRMP would affect routes for consumers to seek advice or raise complaints on consumer issues?

No- but possibly some potential. Can't imagine would have significant impact