
BRIA Business Interview-Scottish Sea Farms

Q1. Briefly describe your business objectives

Scottish Sea Farms are based in Stirling and South Shian, Argyll and currently operates 40 marine farms across Shetland Islands, Orkney Islands, the Highlands and Argyll. We export to over 25 different world markets and plan carefully to meet our customer needs.

Objectives

- Sustainably produce Scottish farmed salmon from marine waters at competitive prices, which provide quality products adapted to meet consumer requirements.*
- To develop a culture which protects and enhances the values of our employees providing benefits to our customers, employees and the communities in which we operate*
- To be a leading Producer through innovation and best practice.*

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

Yes, overall.

Social objective- doesn't capture employment benefits (job creation) and the resulting impact on local spend.

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 with suggested benefits of options 1&2.

Option 3- Yes, agree to policy changes in general but some elements of policies don't provide a reduction in planning uncertainty, for example MPA1, and the reference to the Natura sites in all policies within the Productive section.

MPA1- wording makes it vague and less certain. The use of the word "may" which could be used by regulators to define "potential" risks not "definite" risks.

[Rachel has noted to check the reasoning behind the word "may" within this policy. Explains that the caveat regarding Natura sites in the policies within the Productive section were a requirement by SNH.]

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

No

Costs of Implementing Options 1 & 2

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

Agree

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

Agree

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**?

Generally agree. Some costs are as yet unclear. Waste/decommissioning policies not expecting to be a large additional cost but this is unknown at this stage.

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

Yes, in favour of option 3.

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

Don't see the SIRMP as economically burdensome but wider regulatory framework is becoming an increasing cost burden. There is a regulatory creep and the level of detail that regulators require is increasing, for example we are required to write more EIA's (50% increase for expansion sites). We are seeing more delays in planning decisions resulting in additional costs.

Climate policy- Blue carbon. It would be useful to have a list of all the blue carbon habitats. [Rachel- In Shetland these are Horse mussel, Maerl and seagrass beds. Will look at adding more information on blue carbon in Shetland]. As these are protected within the PMF policy, this is not an issue but could be if it was to include other habitats. Scottish Sea Farms are promoting salmon as a low carbon protein product and are always looking to reduce their impact- feed, fuel options etc.

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?

Waste procedures are mentioned within EIA but is small section and fairly basic.

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

Currently undertaken as part of our business procedures and does not take us long.

Q12. Do you currently have written waste management procedures?

Yes, and always looking to do more. Scottish Sea Farms on a company level are working with a marine litter NGO to get more involved in removing marine litter. Currently involved in some beach cleans locally and keen to do more.

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

No other costs.

[Rachel- There will be a guidance document published to assist with the creation of waste minimisation plans]

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?

We would not look to submit an application for development within an area which could be an obvious navigational risk but might within a larger harbour area.

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

Have concerns over the wording of this policy, would rather the wording be “may be” instead of “will be”. Also, the wording is quite vague. It states “potential to restrict further expansion” but there is no reference to a master plan and no time scale so no real definition of potential expansion. This makes it difficult to assess potential costs. Economic implications would be low if there were clear harbour/master plans but potentially high if there is less clarity.

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

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?

Fairly happy with this policy, do not foresee any impact.

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?

Fine, no issues or additional impacts/costs.

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

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?

*This is also covered within the PMF policy so not an issue for us. Helpful that more information is provided such as mapped areas.
No additional issues.*

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

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?

*Agree with this policy, it seems reasonable and is caveated to state that it is "as directed by the consenting authority".
The industry could be more proactive when it comes to removing old/historical abandoned equipment.*

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

No, do not currently create formal decommissioning plans

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

*Unsure as do not yet know what they would entail.
[Rachel- Suggest to Shetland Islands Council as consenting authority, that a guidance/example is published to aid creation of decommissioning plan].*

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

Have not created them in the past but would not expect it to be a timely or large cost to us but this is unknown at this stage.

New Policy- Development Restricted Areas (Pg 101 SIRMP)

See Table 2: Amended and new policies

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

Possibly.

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)?

Agree with the inclusion of this policy, it adds clarity.

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?

No

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?

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?

No

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

No