



ESTABLISHED 1968

The Finest Salmon from
SCOTLAND



Environmental Management Plan

Farm Management Area W15

Maaey (FS1315)

Maragay Mor (FS1304)

Morrison's Rock (FSXXXX)

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Glossary of Abbreviations and Terms

Abbreviation / Term	Definition
2D	Two Dimensional
3D	Three Dimensional
AMX	Alphamax
BFS	Bakkafrost Scotland Ltd.
CAR	Controlled Activities Regulations (The Water Environment (Controlled Activities) (Scotland) Regulations 2011)
CoGP	Code of Good Practice for Scottish Finfish Aquaculture
DSFB	District Salmon Fisheries Board
EMP	Environmental Management Plan
FHI	Fish Health Inspectorate
FMA	Farm Management Area
g	Gram
Initiator	A Relevant Party that makes contact with another Relevant Party
ISLM	Integrated Sea Lice Management
LPA	Local Planning Authority
NTS	National Treatment Strategy
R&D	Research and Development
Recipient	The Relevant Party that receives contact from the Initiating Relevant Party
Relevant Parties	The parties relevant to the EMP, as outlined in Table 1.1
SEPA	Scottish Environmental Protection Agency
SGMD	Scottish Government's Marine Directorate
SIWG	Salmon Interactions Working Group
SLAP	Sea Lice Action Plan
SLMS	Sea Lice Management Strategy
SLRF	Sea Lice Regulatory Framework
SOP	Standard Operating Procedure
T	Tonne
VMD	Veterinary Medicines Directorate
WFSLMS	Wild Fisheries Sea Lice Monitoring Strategy

1 Introduction

1.1 Purpose of the Environmental Management Plan (EMP)

This EMP has been designed to satisfy the EMP criteria set by the Scottish Government's Marine Directorate (SGMD) and to encompass the recommendations made by the Salmon Interactions Working Group (SIWG) (2020)¹. The Local Planning Authority (LPA) regulates potential interactions between aquaculture and wild fisheries through planning powers afforded by the Town and Country Planning (Scotland) Act 1997, in addition to acting under its biodiversity responsibilities under the Nature Conservation (Scotland) Act 2004. Where this EMP is implemented by means of a Planning Condition, this provides the LPA with enforcement capabilities to ensure adherence by Bakkafrost Scotland Ltd. (BFS) to the environmental management commitments detailed within the EMP.

In 2021, the Scottish Government named the Scottish Environment Protection Agency (SEPA) as lead body responsible for managing the risk to wild salmonids from sea lice from fish farms, and that they would consult on proposals for an adaptive spatially-based risk assessment framework for managing sea lice interactions between farmed and wild salmonids, which will be applied through the Water Environment (Controlled Activities) (Scotland) Regulations 2011. Following this appointment and consultation, SEPA implemented the Sea Lice Regulatory Framework (SLRF) in February 2024, used as a screening tool to ensure development occurs in the areas of acceptable risk level, and applying conditions to limit levels of sea lice on farms of relative higher modelled risk. It is intended by SEPA (and arrangement with LPAs) that the SLRF will supersede all existing EMPs by 2026, however the EMP will continue to serve as an interim measure until this transition is complete.

The EMP provides a mechanism for communication between relevant local wild fisheries interests (hereafter, the 'Relevant Parties') as detailed in **Table 1.1**.

Table 1.1: Local wild fisheries interests.

Organisation	Interest
BFS	Aquaculture Operator
SGMD	Industry Regulator
LPA	Planning Authority and Consent Compliance
Western Isles District Salmon Fishery Board (DSFB)	Statutory Consultee

The EMP is supported by the following Annexes:

- Annex 1: SEPA Controlled Activities Regulations² (CAR) Consents; and
- Annex 2: Loch Uiskevagh Wild Fisheries Sea Lice Monitoring Strategy (WFSLMS).

1.2 Commitment for Action

BFS commits to achieving the aims and objectives of this EMP through taking the necessary management actions set out hereunder, to include:

- Complying with all relevant statutes and laws;
- Complying with all relevant standard operating procedures;
- Complying with hazardous substances regulations and guidance ensuring correct handling and storage;
- Complying with the Sea Lice Management Strategy (SLMS);
- Implementing all necessary mitigation measures as required; and

¹ <https://www.gov.scot/publications/report-salmon-interactions-working-group/>

² Water Environment (Controlled Activities) (Scotland) Regulations 2011. [Online] Available at: <https://www.legislation.gov.uk/ssi/2011/209/contents>

- On a regular basis, to evaluate the performance through appropriate audits and reviews and to strive for constant improvement.

Additionally, in so far as not co-incident with the above, BFS commits to take appropriate action if there is a breach of the lice intervention criteria stipulated by the Code of Good Practice (CoGP)³ or if an escape event occurs or is suspected. The course of action will be dependent on the exact situation but will be documented and communicated with the local wild fisheries interests and the LPA, as required.

1.3 EMP Location Information

The Scottish Finfish Aquaculture CoGP³ defines areas in which finfish aquaculture occurs into separate Farm Management Areas (FMA). The FMA describes the area in which marine farm operators are recommended to synchronise operational activities such as following, fish health interventions and single-year class stocking to manage and minimise risks posed by infectious agents and parasites. This EMP covers all BFS farms within FMA W-15 (**Figure 1.1**), which encompasses Loch Uiskevagh. BFS is the only marine finfish operator in FMA W-15. Should any other marine salmon operators wish to start production in FMA W-15, BFS will seek to engage with the operator to facilitate a coordinated EMP approach.

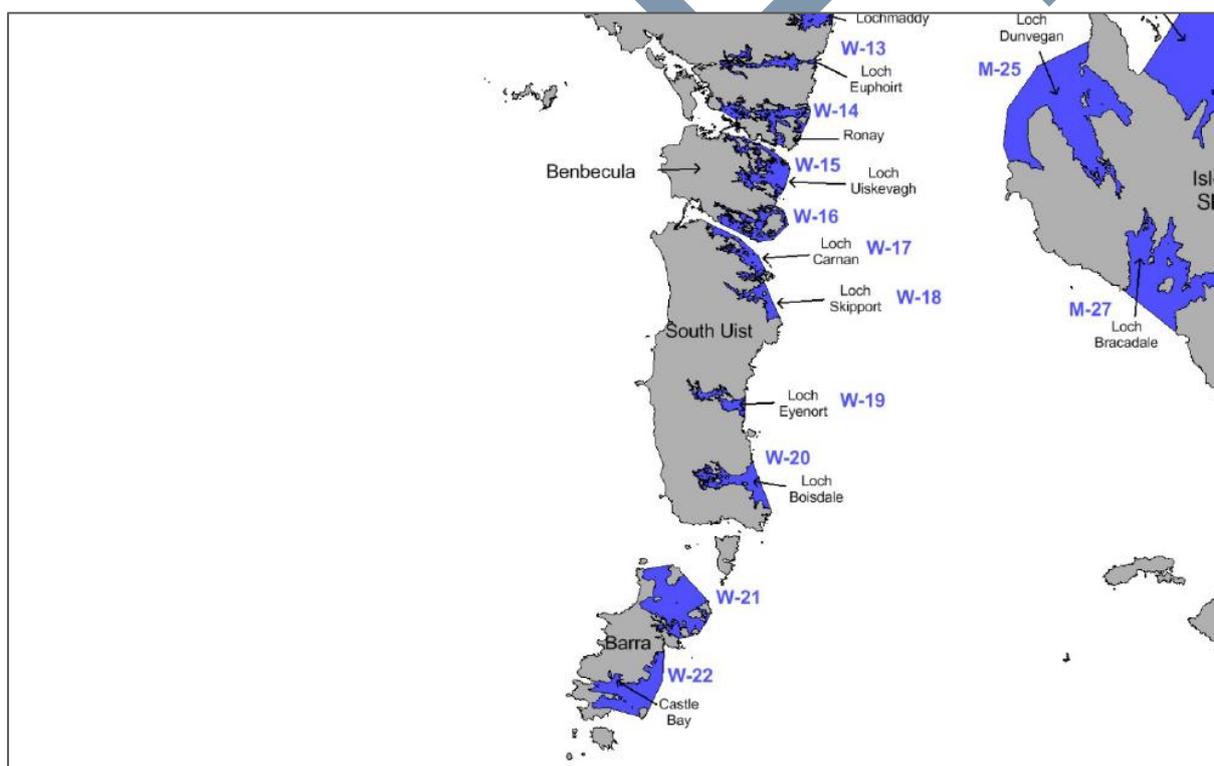


Figure 1.1: Location and boundary of CoGP FMA W-15.

The specific information relating to each BFS farm covered by this EMP is detailed in **Table 1.2** and shown in **Figure 1.2**. Collectively, the named farms will hereafter be referred to as ‘the Farms’.

³ Scottish Salmon Producers Organisation (SSPO) Code of Good Practice for Scottish Finfish Aquaculture (CoGP). Available at: <http://thecodeofgoodpractice.co.uk/>

Table 1.2: BFS Farms covered by the Loch Uiskevagh EMP

Farm Name	Location	Farm ID	Planning Reference	Planning Condition	Biomass Consent (Tonnes (T))	Pens (No. x Circumference)	Production
Uiskevagh	Loch Uiskevagh	FS1255	FFR/WIC/088	N/A	1,103.50	12 x 70s	Inactive
Maaey	Loch Uiskevagh	FS1315	13/00290	N/A	2,000.00	16 x 100s	Active
Maragay Mor	Loch Uiskevagh	FS1304	15/00160	N/A	2,150.80	10 x 120s	Active
Morrison's Rock	Loch Uiskevagh	FSXXXX	Proposed Farm	Proposed Farm	5,050 (proposed)	8 x 160 m	Proposed Farm

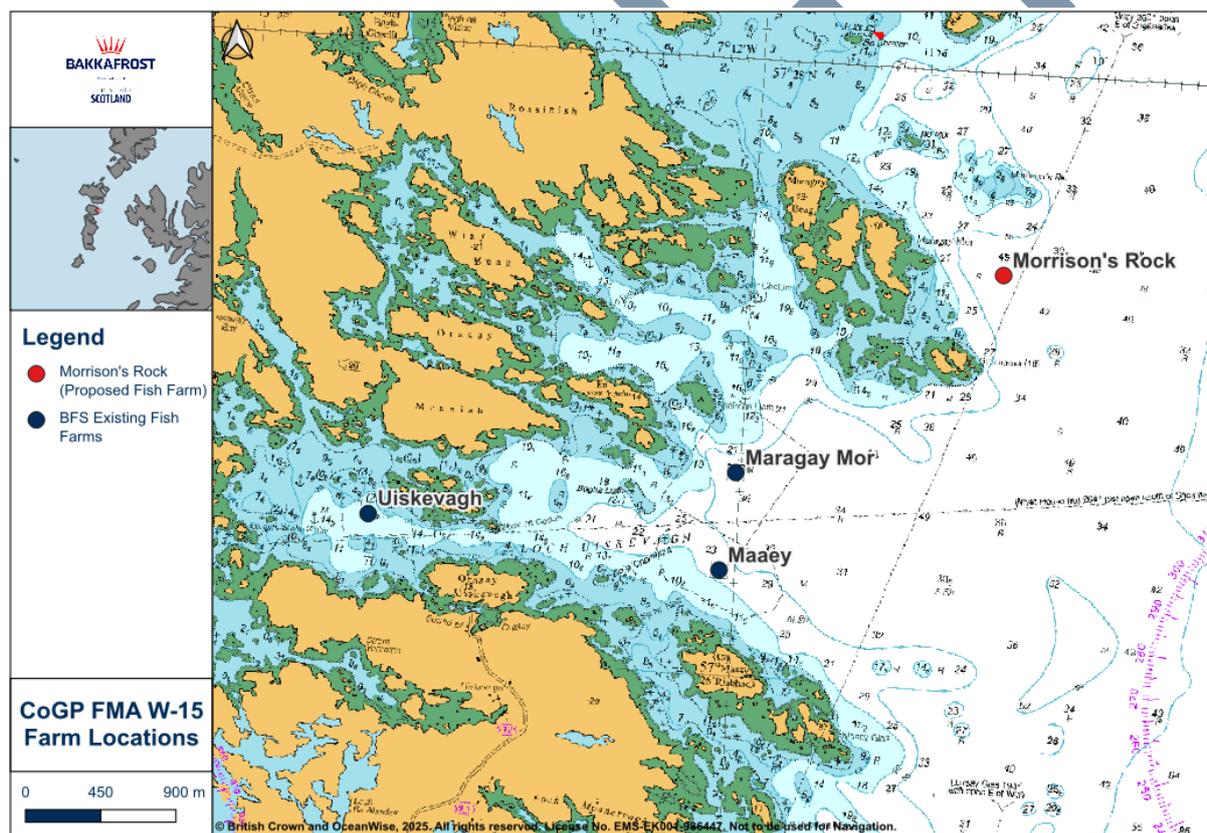


Figure 1.2: FMA-W15 EMP farm locations.

2 Aims of the EMP

The purpose of the EMP is to provide a framework for interaction between BFS and the Relevant Parties to achieve the aims set out below.

The EMP is for use by those parties involved in the operational activities of the Farms and details the environmental management commitments made by BFS throughout the operational lifetime of the Farms in FMA W-15.

In addition to satisfying the SGMD EMP criteria, this plan has been prepared to meet the requirements of the Town and Country Planning Regulations and the Conservation (Natural Habitats, &c.) Regulations 1994, and to enable the obligation of the LPA to manage potential impacts on wild salmonids from farming activity to be satisfied. The EMP is also a functional document and is linked to various BFS Standard Operating Procedures (SOP) and Strategies. This will also provide a framework for compliance auditing and monitoring to provide assurance to statutory stakeholders that the necessary levels of sea lice management are being met.

The EMP specifically illustrates the proposed actions required to manage sea lice sufficiently and appropriately at the Farms to achieve the principal aim:

- To ensure that salmonid farming activity within the FMA does not result in negative impacts to local salmon and sea trout populations.

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3 Objectives of the EMP

The aim of the EMP will be achieved through the implementation of four Objectives identified as essential EMP criteria by SGMD:

- Report on the level of lice released into the environment;
- Identify the likely area(s) of sea lice dispersal from the farm;
- Provide details of the monitoring data that will be collected to assess potential interaction with wild fish; and
- Provide details how this monitoring information will feed back to management practice.

A summary of the Objectives, the related Prescriptions (measures taken to achieve objective), are summarised in **Table 3.1**.

Table 3.1: EMP objectives and prescriptions.

Objective	Prescription
Objective 1: Report on the level of lice released into the environment.	Prescription 1.1: Area lice load reports
	Prescription 1.2: Sea lice compliance monitoring
	Prescription 1.3: Implementation of improved treatment threshold
	Prescription 1.4: Adherence to statutory sea lice reporting guidelines
Objective 2: Identify the likely area(s) of sea lice dispersal from the farm.	Prescription 2.1: Sea lice dispersal analysis
Objective 3: Provide details of the monitoring data that will be collected to assess potential interaction with wild fish.	Prescription 3.1: WFSLMS
	Prescription 3.2: Implementation of the SLMS
Objective 4: Provide details how this monitoring information will feed back to management practice.	Prescription 4.1: Implementation of the Integrated Sea Lice Management (ISLM) Plan
	Prescription 4.2: Carry out sea lice treatment efficacy monitoring (Bioassays)
	Prescription 4.3: Implementation of Sea Lice Action Plan (SLAP)
	Prescription 4.4: Continuous operational monitoring feedback loops
	Prescription 4.5: End of production cycle review
	Prescription 4.6: Engagement procedure

3.1 Objective 1: Report on the level of lice released into the environment

The following Prescriptions detail the commitments and measures to be undertaken by BFS, to achieve Objective 1 of the EMP.

3.1.1 Prescription 1.1: Area Lice Load Reports

BFS will produce an Area Lice Load Report which will indicate weekly farm performance relative to CoGP based on the stocked numbers of fish and adult female lice counts. This will be compared to a theoretical benchmark specific to the FMA derived from a calculation of maximum stock count x CoGP lice treatment threshold (subject to temporal variations). Calculation of the area lice load will be an iterative process with the basis for calculation subject to periodic review (See Prescription 4.5) and agreement by the Relevant Parties.

3.1.2 Prescription 1.2: Sea Lice Compliance Monitoring

Sea lice counts at the Farms will be undertaken on a weekly basis as a minimum, this is weather dependent and contingent on other operations such as harvesting (as there are restrictions on the use of anaesthetic prior to harvesting). The minimum lice monitoring that is undertaken is in accordance with the National Treatment Strategy (NTS) (as outlined in CoGP) i.e., a minimum of 5 fish from 5 pens are sampled. However, BFS' strategy involves sampling **10 fish from every stocked pen** at least once a week, unless the health of the fish dictates that fewer fish are sampled.

All individuals undertaking this monitoring will have undertaken full lice identification and lifecycle training, biology and health monitoring training, and environmental training.

Count information will be collated and stored on BFS' Fishtalk database. This information is also held from previous cycles for review, and includes full staging breakdowns, trends, and treatments, to allow for benchmarking and improvements to be made in future production cycles, helping to ensure the adaptive management of each of BFS farm. Under the Fish Farming Businesses (Reporting) (Scotland) Order 2020⁴, BFS reports the weekly average adult female sea lice numbers per fish on farms to Scottish Ministers within 8 days after the end of the reporting week. These data are then published online⁵.

Observation of lice counts by Relevant Parties shall be facilitated on reasonable request by BFS, on the understanding that reciprocal arrangements may be made possible for observation of wild fish lice counts. Lice count observation requests will be facilitated where reasonable notification has been provided, pending favourable weather and farm operations permitting.

3.1.3 Prescription 1.3: Implementation of Improved Treatment Threshold

To facilitate more effective sea lice treatment at all of its farms, BFS operates to treatment thresholds that are below that of the NTS, as recommended by the CoGP. The NTS recommends a threshold of **0.5** female lice per fish from February to June and **one (1)** female louse per fish from July to January. However, BFS' threshold for intervention is lower, at **0.5** adult female lice throughout the year.

⁴ <https://www.legislation.gov.uk/ssi/2020/447/article/3/made>

⁵ <https://www.gov.scot/publications/fish-health-inspectorate-sea-lice-information/>

This is based on current knowledge of lice moult rates, which are temperature dependent, and allows ample time for treatment planning and resource allocation, as well as any other husbandry interventions that may reduce sea lice escalation.

In practice, intervention first occurs when lice are at absent or negligible levels on the Farms, through the strategic use of cleanerfish and in-feed medicinal treatments, in accordance with the quantities permitted under CAR.

3.1.4 Prescription 1.4: Adherence to Statutory Sea Lice Reporting Guidelines

BFS adheres to the revised SGMD guidelines for sea lice reporting⁶. These measures help facilitate active management and are enforced under the regime shown in **Figure 3.1**.

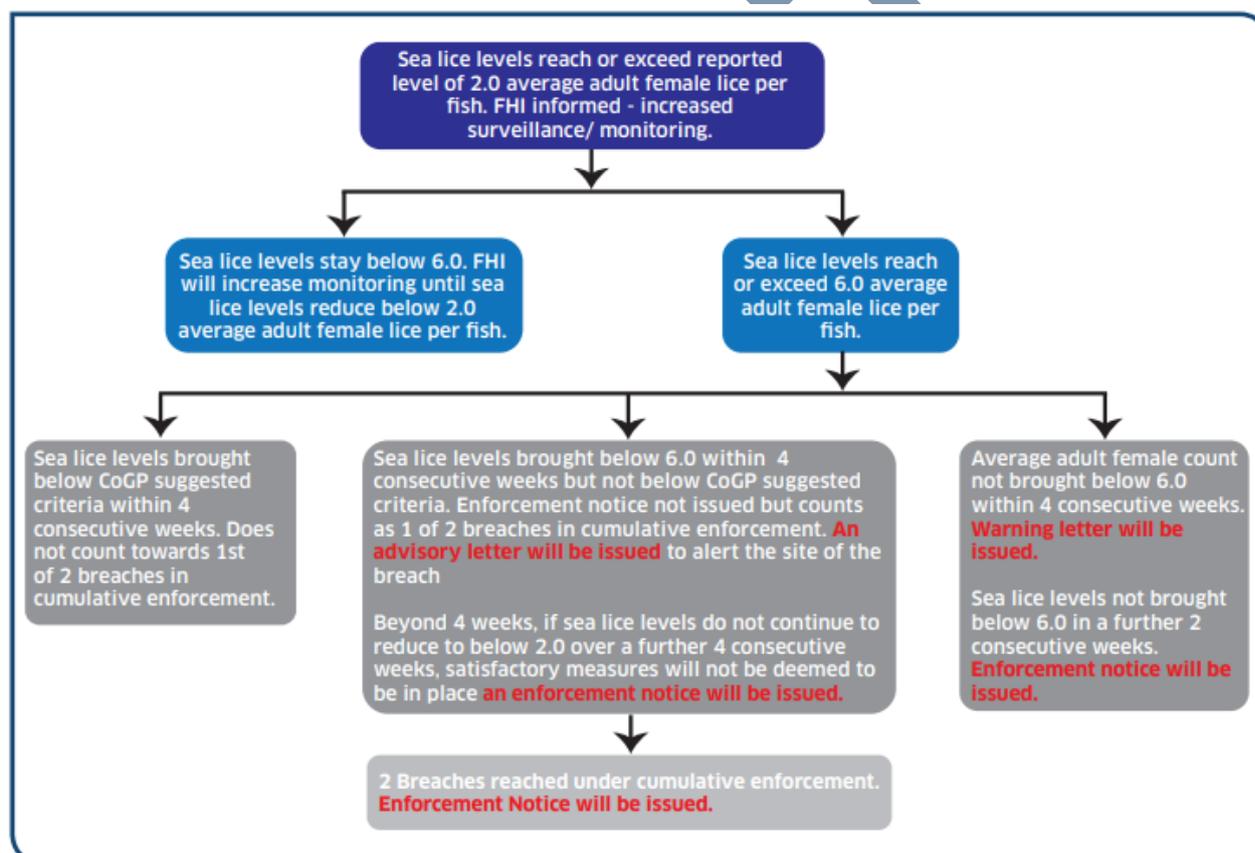


Figure 3.1: SGMD sea lice policy enforcement regime⁷.

Reporting will be to the Fish Health Inspectorate (FHI) Duty Inspector by telephone (0131 244 3498) or by e-mail (MS.FishHealth@gov.scot).

If sea lice levels reach company thresholds (as detailed in Prescription 1.3), BFS will follow the ISLM Plan (see Prescription 4.1 Implementation of the ISLM Plan). This details the options for intervention that are available to BFS and the decision-making process that will be followed on the Farms. The appropriate course of action will be determined by BFS Production and Biology staff.

⁶ <https://www.gov.scot/publications/fish-health-inspectorate-sea-lice-information/>

⁷ <https://www2.gov.scot/Resource/0054/00547487.pdf>

3.2 Objective 2: Identify the likely area(s) of sea lice dispersal from the farm

The following Prescription details the commitments and measures to be undertaken by BFS to achieve Objective 2 of the EMP.

3.2.1 Prescription 2.1: Sea Lice Dispersal Analysis

BFS will undertake a sea lice dispersal analysis of the Farms covered by the EMP. The analysis will aim to provide a spatial representation of likely areas of sea lice dispersal from the Farms using environmental data to simulate passive particle movement along hydrographic pathways.

The scale and resolution of the analysis will be determined by a review of existing environmental data, modelled outputs and published literature, and the analysis may range from coarse-scale two-dimensional (2D) representations to fine-scale three-dimensional (3D) modelling, depending on available data and the size of the area to be analysed.

The dispersal analysis output will be used to inform the sampling locations included within the WFSLMS, i.e., by predicting likely areas of dispersal, the analysis will enable relevant sampling to be undertaken in areas of both high and low predicted lice connectivity.

3.3 Objective 3: Provide details of the monitoring data that will be collected to assess potential interaction with wild fish

The following Prescription details the commitments and measures to be undertaken by BFS, to achieve Objective 3 of the EMP. Specifically, data will be collected with the aim of improving understanding of interactions between farming activity and wild salmonid populations.

3.3.1 Prescription 3.1: Wild Fisheries Sea Lice Monitoring Strategy (WFSLMS)

To provide a broader overview of the potential interaction with wild salmonids, and to engage in appropriate off-site monitoring, BFS will develop a WFSLMS to be agreed with the Relevant Parties (Annex 2: Loch Uiskevagh Wild Fisheries Sea Lice Monitoring Strategy). The key objectives of the WFSLMS are:

- To develop and deploy a strategy to assess risk to wild salmonid populations from lice infection. The strategy will provide a methodology for assessing risk which initially will be based on appropriate published literature but will be kept under review and re-assessed as necessary;
- To gather information on sea trout abundance at selected netting locations; and
- To gather such other information as will further inform knowledge on interactions.

The WFSLMS details the monitoring commitments and the mechanisms by which the monitoring results can be communicated between Relevant Parties with the aim of improving the understanding of interactions between aquaculture operations in the FMA and wild salmonid populations in the area covered by FMA W-15. These include:

- Reciprocal sharing of lice count data on wild and farmed fish; and
- Wider engagement/collaboration and research opportunities.

Notwithstanding the use of publicly available data, BFS will commission a suitably qualified and experienced contractor to undertake the monitoring detailed in the WFSLMS.

Since 2023, BFS have commissioned the Outer Hebrides Fisheries Trust, to undertake sea trout monitoring in the North Ford area of Uist, to establish a baseline condition of the local sea trout population. The 2024 report concludes:

“It appears lice burdens are generally low amongst the sea trout population in the North Ford area at the times sampling has been conducted. There were challenges both in terms of weather and non target species during the 2024 sweep netting which limited the sample size. A more robust set of baseline data could be obtained with further attempts next year.”

3.3.2 Prescription 3.2: Implementation of the Sea Lice Management Strategy

The BFS SLMS provides an overarching framework of strategic principals under which lice will be managed on the Farms, aiming to achieve **zero ovigerous sea lice, particularly during the wild smolt migration period**. The framework includes:

- Adherence to FMA requirements (CoGP), in particular synchronising production cycles between farms within the FMA; and
- Implementation of available sea lice management measures (**Table 3.2**).

Table 3.2: Available Sea Lice Management Measures

Management Option	Implementation Adaptations	Management Type
Treatment Forecasting (End of Cycle Review)	Intervention frequency Intervention type Intervention duration Adjust intervention criteria as circumstances dictate	Strategic
Treatment Plan (Real Time)	Adjust intervention criteria as circumstances dictate Target higher risk pens	Reactive
Pre-transfer preparation	Vaccination strategy for optimal salmon health Pre-transfer sea lice treatments where possible Target larger smolt to higher risk sea farms	Strategic/ Preventative
Biological Cleanerfish	Species (wrasse or lumpfish) Source (wild caught or farmed) Stocking ratio Stocking dates	Strategic/ Preventative
Production Planning	Stock to avoid peak lice challenges with smolt migration window	Strategic
Mechanical Freshwater	Maintain gill health to promote robustness to sea lice intervention Frequency Duration	Strategic/Reactive
Mechanical – Thermal (e.g. Thermolicing)	Increased vessel resource Frequency Duration	Reactive
Mechanical – Water Jets (e.g. Hydrolicing)	Increased vessel resource Frequency Duration	Reactive
Medicinal	Dosage (subject to consents and prescriptions) SLICE Alphamax (AMX)	Preventative/ Therapeutic

Management Option	Implementation Adaptations	Management Type
	Salmosan/Azasure	
Efficacy Testing	Targeted testing for resistance/efficacy	Reactive/Strategic
Stock Movements	To reduce biomass and density	Reactive/Strategic
Harvest Plan	Early harvest	Reactive
Genetics	Breeding programme to enhance sea lice resistance	Ongoing
Research and Development (R&D)	Ongoing R&D to develop novel technologies and procedures and optimise existing technologies.	Ongoing

3.4 Objective 4: Provide details of how this monitoring information will feed back to management practice

BFS commits to adaptive management in accordance with the following prescriptions to achieve the aim of the EMP. Adaptive management means that BFS shall be responsive to evidence of impacts on wild salmonid populations from the WFSLMS.

3.4.1 Prescription 4.1 Implementation of the ISLM Plan

The ISLM Plan has been developed to provide guidance on how SLMS measures will be implemented at the Farms.

The aim of the ISLM Plan is to actively reduce the use of medicinal products, prioritising the use of biological control and systems that physically remove sea lice. A flow diagram of the ISLM Plan is presented in **Figure 3.2**. This demonstrates the decision-making process to be applied to inform the appropriate implementation of SLMS treatment measures.

The interventions that BFS have available include those detailed in the SLMS **up to, and including, depopulation** of a farm in the event that all prior interventions have proved unsuccessful, evidenced by continued monitoring of lice on farmed fish and intervention efficacy review (see Prescription 4.2: Carry Out Sea Lice Treatment Efficacy Monitoring). The ultimate decision to undertake biomass reduction will be undertaken by BFS veterinarians and BFS senior management.

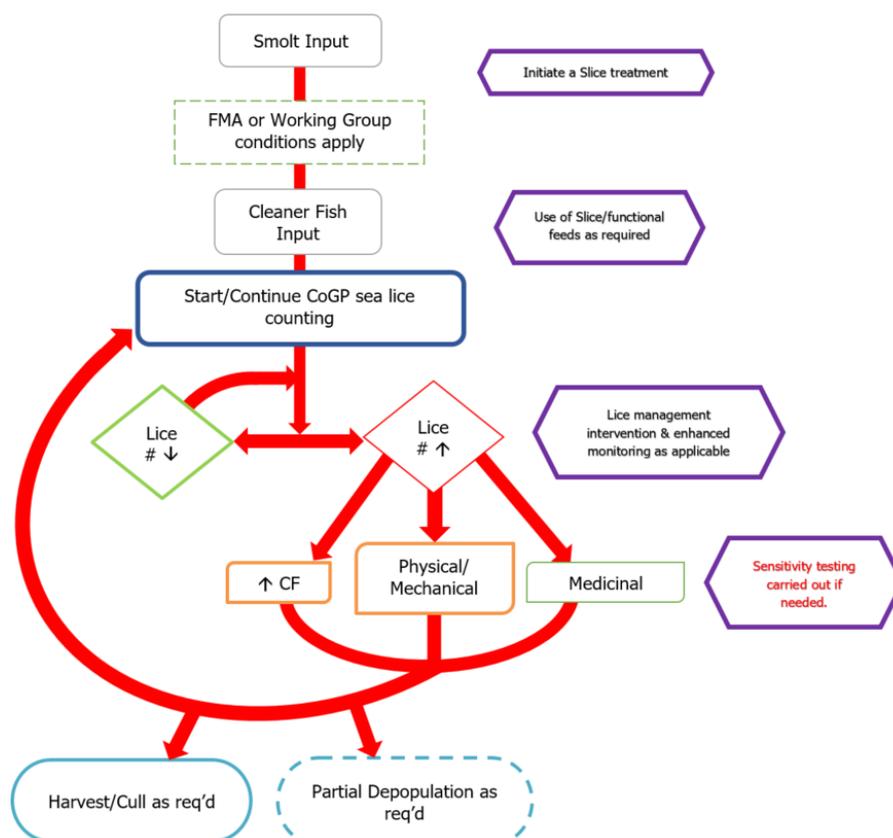


Figure 3.2: ISLM Plan flow chart.

3.4.2 Prescription 4.2: Carry Out Sea Lice Treatment Efficacy Monitoring

Efficacy of sea lice treatments is monitored during the production cycle, partly through assessing ongoing treatment outcomes, and may be supplemented by laboratory bioassays if appropriate. These assessments inform future treatment decisions and facilitate the adaptive management of sea lice.

Treatments are determined to be successful if they achieve at least 50 % clearance, dependant on fish health and treatment type. If a treatment is determined not to be successful, the Biology Department are notified in the first instance, who will determine appropriate action. If the failure is suspected to be of a pharmacological nature, the Veterinary Medicines Directorate (VMD) is also notified.

Treatments are administered taking fish health and welfare into account. If treatments are unsuccessful, and health suggests that fish would tolerate further treatment, then the next appropriate option in the ISLM Plan would be conducted. **If no further options are available, or fish health suggests that handling will not be tolerated well, depopulation of biomass would occur.**

3.4.3 Prescription 4.3: Continuous Operational Monitoring Feedback Loops

As detailed in Prescription 4.1, ongoing monitoring of sea lice numbers forms part of the ISLM Plan and, through the application of feedback loops, will help to inform the appropriate implementation of both preventative and reactive SLMS treatment measures. Ongoing monitoring measures on-site, and furthermore, monitoring in the wider marine environment will actively inform adaptive sea lice management decisions made during operations, as well as the longer-term management of preceding generations and production cycles.

3.4.4 Prescription 4.4 Feedback from Wild Fish Monitoring

BFS commits to meeting with the Relevant Parties twice per production cycle. It is expected that one meeting will occur mid-production cycle to discuss any themes resulting from the first year of the cycle, including monitoring results from the WFSLMS and on-farm lice management. The second meeting will be reserved for the end of cycle review as detailed in Prescription 4.5, to take place during the fallow period prior to restocking of the Farms.

3.4.5 Prescription 4.5: End of Production Cycle Review

Following the completion of each production cycle, and ahead of fish being stocked to the Farms for the next production cycle, a meeting will be held between BFS and the Relevant Parties to review all relevant monitoring data collected through the production cycle. This monitoring data will be presented as an End of Production Cycle Report.

BFS shall identify and deploy outcome-focussed farm management measures designed to remedy impacts on wild salmonid populations caused by farming activity, if evidenced through the WFSLMS in the previous production cycle. These may include, for example, a reduced cumulative area lice threshold for farms in the management area (see Prescription 1.1) or the implementation of alternative technologies (See **Table 3.2**).

This review process will also provide the opportunity to agree any potential changes to the EMP and supporting documents with the Relevant Parties.

3.4.6 Prescription 4.6: Engagement/Action Request Procedure

Outwith the formalised meetings described in Prescriptions 4.4 and 4.5, Relevant Parties on the EMP may contact another in the event that monitoring activities or risk assessment suggest that farming activity may be directly impacting wild salmonids. The engagement procedure will be undertaken as follows:

- Either party (the 'Initiator'), notifies the other (the 'Recipient') by email or in writing the reasons for initiating contact. This notification will include the necessary information that has triggered the Initiator to make contact for example, results of the wild fish monitoring that evidence impacts, or an increased risk, to wild salmonid populations resulting from farming activity. The notification will indicate a time frame in which management action is requested to be taken;
- Examples of such information that may result in engagement include, but are not limited to, significantly elevated lice levels detected during monitoring, the notification of atypical management measures relating to either recreational fisheries or farm management, matters of urgency relating to biosecurity within the local environment, or matters of urgency relating to the health and welfare of fish which would benefit from the assistance of the other party. The notification should also include a statement of urgency and anticipated outcomes of the engagement;
- The recipient will assess the evidence in the light of the aims of this EMP and indicate what management action needs to be taken and the metrics that will be used to review success within a suitable time frame;
- Where the engagement cannot be concluded in writing and further action is required, that a meeting may be facilitated e.g., to accommodate the sharing or presentation of information/data; or to discuss further potential management actions; and
- Any disputes regarding interpretation of this EMP or action arising out of the EMP shall be referred to an appropriate mediator as may be agreed by the Relevant Parties.

Annex 1: SEPA CAR Licences

Table 0.1 lists the consented medicinal products for the Farms covered by this EMP.

Table 0.1: SEPA CAR licences – details of consented medicinal products.

Farm	CAR Licence Number	Emamectin Benzoate			Cypermethrin	Deltamethrin	Azamethiphos	
		MTQ (g)	TAQ (g)	MEQ (g)	3 hrs (g)	3 hrs (g)	3 hrs (g)	24 hrs (g)
Uiskevagh	CAR/L/1010065	213.80	213.80	N/A	62.1	23.30	N/A	64.50
Maaey	CAR/L/1103991	N/A	N/A	505.20	0.14	14.36	N/A	211.00
Maragay Mor	CAR/L/1124848	N/A	N/A	1,298.60	0.15	14.70	N/A	206.50
Morrison's Rock (Proposed Farm)	TBC	N/A	N/A	TBC	N/A	TBC	TBC	TBC

*MTQ – Maximum Treatment Quantity; TAQ – Total Allowable Quantity

Annex 2: Loch Uiskevagh Wild Fisheries Sea Lice Monitoring Strategy

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Monitoring strategy to be agreed through consultation with the Relevant Parties.

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