

[Redacted]

From: [Redacted]
Sent: 02 March 2021 15:21
To: [Redacted] Carmichael DB (Donald)
Cc: [Redacted]
Subject: RE: Clean treat - background note and lines to take

All

[Redacted], but please bear with me as there are 2 different chemicals involved in the Benchmark proposal.

A chemical is used to treat sea lice, usually in a wellboat in which the fish are held for treatment. Then the fish are removed, leaving waste chemicals; and Benchmark proposes that a second chemical is added to those residues to neutralise the first chemical. The aim is that ultimately the neutralised residues can be discharged to the water environment with minimal impact. (This would be a breakthrough for both the industry and SEPA as it would remove many of the environmental concerns about such chemicals).

This final discharge of the residues must meet an appropriate Environmental Quality Standard (EQS) which must be derived in accordance with EU procedures (which is now enshrined in Scots law), subject to an appropriate mixing zone (ie not simply at the point of the discharge from the hose/pipe). It is a matter for the company to demonstrate to SEPA that the system is capable of consistently achieving that EQS. (Just to be clear, even in a trial the discharge must aim to meet the EQS).

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Ultimately it is for the company to bring forward a proposal that it considers meets all the necessary tests. I understand that no application to SEPA has been made, but that the company

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From: [Redacted] @gov.scot>
Sent: 02 March 2021 14:38
To: Carmichael DB (Donald) <Donald.Carmichael@gov.scot>
Cc: [Redacted] @gov.scot>; [Redacted] @gov.scot>
Subject: Clean treat - background note and lines to take

Donald

[Redacted]

[Redacted]

However since the discharges from wellboats are now regulated by SEPA, and MS LOT come out of the equation as the pollutions regulator, I suppose the question of trialling it now rests exclusively with SEPA.

[Redacted]

[Redacted]

So in answer to your question- “we” is now SEPA and “officials” was Alastair Mitchell,
[Redacted] of SEPA and [Redacted] of MS-Lot.

[Redacted]