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Use of Ectosan and Clean Treat in the UK- Meeting 2

Meeting Location: 11th April 2019, 3.15-4.00pm, SEPA Offices, Stirling

Attendees:

Benchmark AH	SEPA	MS	VMD

Commented [redacted]: Please could I ask you to add any attendees I have missed as I didn't catch everyone's names, particularly those participating by phone

General Discussion Points

BMK stated our case to move forwards with Clinical trials in Scotland:

- It was explained that [redacted] the CleanTreat[®] system, [redacted]
- [redacted]
- Our preferred route was [redacted]
- BMK indicated a significant investment [redacted] and that this level of investment would only be approved by the BMK board [redacted]
- BMK indicated that we were hoping for field trials for Ectosan in Scotland later this year (2019).

This initiated the discussion around the licenses, those issued by Marine Scotland and those by SEPA. MS Licenses wellboats for their discharges, while SEPA issues CAR (controlled activity regulation) licenses for the farms. MS noted that the granting of the well boat licence includes a public notice.

Commented [redacted] could you provide further information on this process?

https://www.sepa.org.uk/media/34761/car_a_practical_guide.pdf

The transport of treatment water [redacted] was raised:

- Marine Scotland looked at the discharge [redacted] This needs to be clarified by the MS legal department.
- [redacted]
- [redacted]
- [redacted]

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- It was agreed that there was a need for further clarity on the subject and that MS and SEPA legal teams would need to be involved in drafting a license to allow CleanTreat® at an approved site
- **Reg 10(5)(e)**

There was discussion regarding what other countries are doing and SEPA indicated that they have been talking to Canada and Norway and their interpretation of OSPAR regulations and the London Convention:

<https://www.ospar.org/>

<http://www.imo.org/en/OurWork/Environment/LCLP/Pages/default.aspx>

indicated he would like to discuss with NoMA their approach to the trials already being undertaken in Norway.

In order to move forward, BMK agreed to provide more detailed information on the trial plans, the validation of the CleanTreat®, the validation of the **Reg 10(5)(e)** and the draft ERA for Norway.

The issue of the confidentiality of any data/methods provided outside of the official field trial application was discussed. SEPA indicated that all correspondence must be marked commercially sensitive and confidential. If this is the case, they can refuse any freedom of information (FOI) requests based on commercial sensitivity grounds. SEPA regularly refuse FOI requests on this basis.

also stated the VMD would like to review the proposed field trial protocol. Statistical Updates and review will be done by

BMK also indicated they would like to have a further in-depth discussion with SEPA regarding the methodology for the ERA and the modelling required. This would take place in person between SEPA and (BMK environmental expert), with other interested parties participating by telephone.

Actions

1. BMK to provide by mid-May:
 - a. The **Reg 10(5)** and method validation
 - b. Information on the validation of the CleanTreat®
 - c. Proposed trial design (outline of the treatments on the site, movement of water, cleaning of the water and discharge)
 - d. The draft ERA for Norway
 - e. Draft field trial protocol
2. SEPA /MS / VMD to outline what we can do in the field trials based on #1.
3. Confidentiality /NDA / FIO They recommended we apply appropriate legal terms Commercially Sensitive etc:

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4. [redacted] to set up the separate discussion on the ERA.
5. SEPA and MS Legal teams to discuss **Reg 10(5)(e)** [redacted] (CAR for discharge location, well boat licence etc), and recommend next steps.

Other points

[redacted] be on extended leave starting July and [redacted] will be our contact and owner of the process during [redacted] absence.

MS indicated that there were plans to have SEPA manage all licensing of wellboats associated with aquaculture farms.

A visit to the CleanTreat® vessel during its operation in Norway was offered to interested parties and accepted. [redacted] to facilitate arrangements.

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