

# BVA response to Scottish Government consultation on the new environmental quality standard (EQS) for emamectin benzoate (EmBz)

Who we are

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technologies could also change the way medicines are used in aquaculture, potentially offering alternative solutions in the future which reduce the risk of medicines leaking into the natural environment and impacting wildlife. For example, technology which could enable keepers to treat fish with parasiticides and then clean the water before returning it to the sea has been developed, though further research is needed to establish the safety and efficacy in UK production systems. BVA supports the research and use of new technologies and innovative methods which could improve the sustainability of the sector.

6. Although vital for protecting the environment, regulations can sometimes complicate treatments, as controls on discharge levels may mean farmers can only treat one pen on a farm at a time. This unintentionally results in higher volumes of parasiticide use, as lice travel between pens when they are treated in succession instead of simultaneously. Expert vets working in the sector believe that medicinal treatments would be more effective if whole farms could be treated simultaneously. The marine environment in which fish farms are situated is also highly complex and varied at each site, so we are concerned that the blanket reduction approach being proposed in this consultation would not allow for site-specific data to be considered. Regulations should be more dynamic and have the ability to take into account site specific data to ensure the best outcomes for animal health and welfare, and the local environment.
7. We strongly support the goal of reducing medicines use through improvements in animal health and welfare, use of technology and innovative methods. However, more research into such treatment options and preventive measures for controlling sea lice are needed to ensure they do not compromise the health and welfare needs of the animals in question, and that their use can be managed effectively. All treatments and interventions should be considered and managed through a veterinary health and welfare plan, ensuring appropriate advice is taken into account.
8. We recommend SEPA collaborate with the aquaculture industry, the veterinary profession and fish health and welfare experts to establish a feasible approach to reducing medicine use over time. Until appropriate alternative methods are in place to manage sea lice, we will continue to be concerned about the