

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

## Who we are

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With over 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters. Our response is based on our recent BVA position on [UK sustainable finfish aquaculture](#), developed with support of our Sustainable Aquaculture Working Group.

## Consultation Response

2. We are concerned about the animal health and welfare implications associated with this change. Whilst every effort must first be made to prevent sea lice infestations and reduce the need for medicines, continued access to pharmaceuticals is important for the health and welfare of farmed fish.
3. Sustainable aquaculture should be undertaken in a way that is environmentally, ethically, and economically acceptable for consumers, producers, and wider society. The use of any medicines must always balance the risks for the environment and animal health and welfare. Any regulations should ensure animal health and welfare, human health and environmental health concerns are all appropriately considered, and they must be robust, transparent and evidence based. We are concerned that these proposals have not fully considered the impacts on the health and welfare of farmed fish.
4. We advocate for the need for regulation of the use of veterinary medicines, but the regulatory framework needs to be proportionate, streamlined, evidence-based, and dynamic to reflect the speed of change in the industry and the needs of the fish. Continued access to pharmaceuticals and control of disease are key issues for the aquaculture industry. Accurately measuring the impact of medicines and other chemicals is especially challenging in the marine environment, and decisions cannot be made based on translation of environmental impact from terrestrial or freshwater studies into the aquatic biosphere. A greater understanding of what represents a biologically or ecologically significant effect is needed, as is an agreement on what level of protection is acceptable. In terrestrial systems extinction rates may be measured, but this is challenging in the aquatic environment since there is constant recruitment of individuals from other areas. More research is needed to establish clear and measurable maximum levels for environmental contamination, and to improve methods of marine water quality monitoring, particularly for marine organisms including plankton, jellyfish and hydrozoans.
5. Treating and managing sea lice is an urgent and important issue for the aquaculture industry, and will be a significant sustainability issue going forwards. There is already a limited choice of medicinal therapy available to treat fish, with environmental concerns, plus the development of resistance and reduced efficacy contributing to a decline in reliance on those which remain. As a result, there has already been a growing emergence of non-medicinal lice control options, including use of cleaner fish and thermal or mechanical treatments. These alternatives are promising and could in time lead to a lower reliance on medication, but they are not without their welfare compromises and must also be used cautiously. We are concerned that this change in regulations will force the aquaculture sector to switch to alternative options too quickly, potentially to the detriment of animal health and welfare. New

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 impact of mandatory reductions in the medicines currently being used.