

Dr T.A. A'Hearn
Chief Executive
Scottish Environment Protection Agency
Strathallan House
Castle Business Park
Stirling FK9 4TZ

26th June 2017

Complaint from Scottish Salmon Producers' Organisation to SEPA

Review of Environmental Quality Standard Emamectin Benzoate.

Dear Dr. A'Hearn

I am writing on behalf of my Board to register our collective disappointment concerning SEPA's conduct in relation to its regulation of the use of Slice (active ingredient emamectin benzoate), a licensed veterinary medicine used for the prevention, control and reduction of the sea lice *Lepeophtheirus salmonis* and *Caligus elongatus*. Slice has been, and continues to be, a critically important tool within the industry's strategy to protect the health and welfare of farmed salmon; a strategy strongly encouraged by Scottish Govt in its support for the ongoing sustainable development of this crucially important rural industry.

After attempts by SEPA to persuade MSD (the holders of the Marketing Authorisation for Slice) to remove this product from the market; and the use of a much criticised study (which attempted but failed to show clear evidence of environmental impact arising from the legitimate use of this medicine) to support a rigid and unhelpful approach to regulation of Slice use; the most recent turn of events focuses on the commissioning of a review of the EQS for emamectin benzoate by WRc. This review, which we understand was commissioned in August 2016, was delivered to SEPA in February of this year but has not yet been subjected to independent peer review; nor have those with most experience of developing and using Slice been permitted to submit data and other information in support of ongoing use **prior to its publication**. This general approach conveys the impression of being part of a strategy to delegitimise the use of Slice without providing those who rely on this product the opportunity to offer information to allow an informed and balanced decision to be taken on its future before it entered the public domain. According to advice provided by SEPA, the report will be subject to peer review after its publication on 26th June, flying in the face of normal protocol, where publication of a scientific report of this importance would follow the gathering of all relevant information and peer review.

My Board is disappointed that the WRc report seems to have been prepared with the purpose of undermining the legitimate and sustainable use of a fully licensed veterinary medicine. The derivation of theoretical EQSs **based on highly sensitive organisms that are neither native to UK waters nor inhabitants of the marine environment where Slice is applied** reinforces our concerns. We would be happy to provide more detailed contributions to the process on which SEPA has embarked in due course.

I would be grateful if you could acknowledge receipt of this note and look forward to the favour of an early response.

Yours sincerely,



Scott Landsburgh – Chief Executive