
From:
Sent: 12 September 2019 17:00
To: @gov.scot
Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland - meeting

Yes

From gov.scot @gov.scot>
Date: 12 September 2019 at 16:59:31 BST
To @sepa.org.uk>
Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland - meeting

Hi

Sure, are you able to attend?

From: @sepa.org.uk>
Sent: 12 September 2019 16:57
To: (MARLAB) < @gov.scot>
Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland - meeting

Hi

may not be able to attend in person. Would it work if could phone in?

From: | @gov.scot @gov.scot>
Sent: 12 September 2019 16:12
T bmkanimalhealth.com; sepa.org.uk>; @gov.scot;
vmd.defra.gsi.gov.uk; | SEPA.org.uk>
Cc: bmkanimalhealth.com; bmkanimalhealth.com;
bmkanimalhealth.com; bmkanimalhealth.com; @gov.scot;
bmkanimalhealth.com; sepa.org.uk>
Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland - meeting

Dear

Thanks for this, and for our discussion just now, it is helping with our consideration which we hope to finalise very soon.

As we briefly discussed, it would be good to sit down with MS (me, and possible and I copied) SEPA and copied) and the VMD copied) to map out the regulatory landscape for you, the information

which is required by our advisers and look to understand the timelines involved and you have agreed that we could meet next week at your office in Edinburgh Friday (20th) at 9.00.

You asked the sort of information that we would be seeking. In terms of next steps it would be good to discuss how we can move forward on a few aspects to help you meet the information requirements for a trial and the level of detail needed to make an application to us. As we discussed, it is our current understanding that it should be possible to process a licence application if the discharge from your proposal does not constitute pollution. To that end there is a level of detail required in submissions to be made, either as pre-app or perhaps as part of a marine licence application. Such information can be discussed at the meeting but below is an outline overview of the requirements:

1. Recognising the **Reg 10(5)(e)** from the Netherlands in freshwater, evidence of how the discharge will meet that or any other suitable evidence for meeting acceptable EQS (you mentioned that you had some aspects to discuss on this)
2. Any physical mechanism by which you can demonstrate meeting an EQS by process or techniques to ensure discharge is within an acceptable level.
3. Details relating to fate and behaviour, in particular persistence in the environment, recognising the receiving environment in Scotland.
4. Evidence to be provided to meet certain European standards and SEPA may be able to advise further on that.
5. A trial methodology in order to show adequate processes and testing by acceptable methods to ensure that discharge is within acceptable levels.
6. Details of any expected breakdown products and toxicity.
7. any future application would need a Best Practicable Environmental Option assessment report documenting the consideration of other options for handling.
8. information on the hydrography of an intended discharge location
9. some consideration of any effects upon other receptors (such as fishing interests, wild fish interests and the features of any designated sites proximal to a proposed location).

I hope this is self-explanatory but please feel free to call and discuss if you wish.

Thanks in advance.

Kindest regards

From: @bmkanimalhealth.com>
Sent: 22 August 2019 09:21
T (MARLAB) @gov.scot>; sepa.org.uk;
(MARLAB) gov.scot> [@vmd.defra.gsi.gov.u](mailto:vmd.defra.gsi.gov.u) @SEPA.org.uk
Cc: @bmkanimalhealth.com>; @bmkanimalhealth.com>;
@bmkanimalhealth.com>; @gov.scot>;
@gov.scot>
Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland

Dear

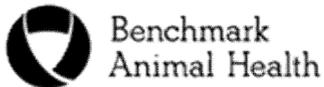
Please find attached the response to the questions Marine Scotland raised on the white paper. It hopefully answers the question you have. If not, please don't hesitate to call me.

The key for us to move forward is how the current or pending regulatory framework influences our proposals for discharges at sea. Our preference is to be able to **Reg 10(5)(e)**

we need to know what is possible within the regulatory framework around the discharge.

Kind Regards

Animal Health Division



Bush House, Edinburgh Technopole, Edinburgh, EH26 0BB

LEGAL INFORMATION This email has been sent by and on behalf of Benchmark Holdings PLC or its subsidiaries (Registered Address: Benchmark House, 8 Smithy Wood Drive, Sheffield, S35 1QN, UK. Registered Number: 4115910). This email has been swept by anti-virus software. You are solely responsible for ensuring that any e-mail or attachment you receive is virus-free. We disclaim liability for any damage you suffer as consequence of receiving any virus. The views expressed within the e-mail are those of the author and may not necessarily constitute or imply their endorsement or recommendation by Benchmark Holdings.

CONFIDENTIALITY The information contained in this email is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful. If this information has come to you in error you should take no action based on them, and should not copy or show them to anyone; simply please reply to this email and highlight the error.

From: [@gov.scot](mailto:) <[@gov.scot](mailto:)>
Sent: 21 August 2019 14:48
To: [@bmkanimalhealth.com](mailto:)>; [@sepa.org.uk](mailto:); [@gov.scot](mailto:);
[vmd.defra.gsi.gov.uk](mailto:); | [SEPA.org.uk](mailto:)
C [@bmkanimalhealth.com](mailto:)>;
[bmkanimalhealth.com](mailto:)>; [@bmkanimalhealth.com](mailto:)>;
[@bmkanimalhealth.com](mailto:)>; [@gov.scot](mailto:); [@gov.scot](mailto:)
Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland

Dear

I hope this finds you well and you had a good summer holiday.

I note that you haven't responded to the below query, we are obviously trying to provide you with an answer to the licensing question and I was after the below info to try to help that. It's the third question below in relation to where and under what circumstance the boat discharging the effluent water is proposed to carry out that activity which is key and I had imagined that might be a fairly simple question to answer.

Perhaps you could give me a call if providing the below is proving problematic?

Kind regards

(MARLAB)

Sent: 02 July 2019 16:19

T [@bmkanimalhealth.com](mailto:)>; [@sepa.org.uk](mailto:)>;
(MARLAB) <| [@gov.scot](mailto:)>; [@vmd.defra.gsi.gov.uk](mailto:)>;

@SEPA.org.uk>
@bmkanimalhealth.com>;
@bmkanimalhealth.com>;
@bmkanimalhealth.com>;
@gov.scot>
@gov.scot>;

Subject: RE: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland

Dear I

Thank you for the documentation submitted.

As you know, there are some regulatory questions to close off, in addition to the ongoing technical discussion. At the meeting at SEPA's office you proposed the submitted 'white paper' to provide the detail on the discharge to sea to enable MS to consider the regulatory pathway, whilst the technical discussion proceeded between Benchmark and SEPA, as the statutory consultee to the marine licensing process.

The consideration of the regulatory questions is ongoing. However, the application of marine licensing rules to your proposal is in relation to the actual discharge to sea. Your 'white paper' doesn't seem to provide sufficient detail on how that would happen, the interaction of the vessels, the transfer of effluent water and how and where the cleantreat vessel would undertake any discharge activity, for us to come to a view. I'm not able to find the required level of detail in the paper submitted to us by Benchmark titled 'Benchmark Animal Health Limited Ectosan® & Cleantreat, Effective Sea Lice Treatment with Proven Prevention of Environmental Impact, for Field Trials in Scotland' either.

As I have asked before, what we really need to know for our consideration of the regulatory questions is:

What is being discharged to sea?

Where is this taking place?

What is the pathway of the effluent water **Reg 10(5)(e)**

If you had any information in relation to how your trial was permitted in Norway.

I am aware that we are approaching the holiday period and I am on leave from Thursday, I therefore ask that you please copy my colleagues (all copied) into any further correspondence.

Kind regards

From: @bmkanimalhealth.com>
Sent: 07 June 2019 15:48
To: (MARLAB) @sepa.org.uk>; (MARLAB) <@gov.scot>;
@gov.scot>; @vmd.defra.gsi.gov.uk>;
@SEPA.org.uk>
Cc: @bmkanimalhealth.com>;
@bmkanimalhealth.com>; @bmkanimalhealth.com>;
@bmkanimalhealth.com>

Subject: Commercially Sensitive and Confidential: White paper on use of Clean Treat in field trials in Scotland

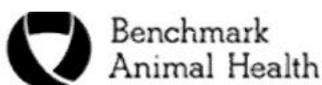
Dear Everyone,

Please find attached the white paper on how we would like to use our CleanTreat vessel during the field trials for Ectosan in Scotland. This paper includes information on the **Reg 10(5)(e)** and its validation. Also attached is the draft protocol for the trial we wish to perform. The draft ERA has already been shared with SEPA by _____ and discussed in a face to face meeting.

Following your review of the attached information it would be great to get your feedback as soon as possible so we can build a roadmap to the field trial application and commencement of trials in 2019. If you need any further information please don't hesitate to contact me and we would be happy to meet to discuss this at your earliest convenience.

Kind Regards

Animal Health Division



Bush House, Edinburgh Technopole, Edinburgh, EH26 0BB

LEGAL INFORMATION This email has been sent by and on behalf of Benchmark Holdings PLC or its subsidiaries (Registered Address: Benchmark House, 8 Smithy Wood Drive, Sheffield, S35 1QN, UK. Registered Number: 4115910). This email has been swept by anti-virus software. You are solely responsible for ensuring that any e-mail or attachment you receive is virus-free. We disclaim liability for any damage you suffer as consequence of receiving any virus. The views expressed within the e-mail are those of the author and may not necessarily constitute or imply their endorsement or recommendation by Benchmark Holdings.
CONFIDENTIALITY The information contained in this email is confidential. It is intended solely for use by the recipient and others authorised to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful. If this information has come to you in error you should take no action based on them, and should not copy or show them to anyone; simply please reply to this email and highlight the error.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email has been scanned by the Symantec Email [Security.cloud](#) service.
For more information please visit <http://www.symanteccloud.com>

This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return. Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-

mhàin. Chan eil e ceadachd a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more [Click Here](#).

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This email has been received from an external party and has been swept for the presence of computer viruses.

This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return. Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadachd a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan

Riaghaltas na h-Alba.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>

This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return. Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadachd a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.
