AP2-12-26
By hand

ALAB
An Bord Achomhairc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board

Notice of Appeal Under Section 40(1) of Fisheries (Amendment) Act 1997 (No.23)
APPEAL FORM

Please note that in accordance with Section 40(2) of the 1997 Act this form will only be accepted if delivered by **REGISTERED POST or by hand** to the ALAB offices at the following address: **Aquaculture Licences Appeals Board, Kilminchy Court, Dublin Road, Portlaoise, Co. Laois, R32 DTW5**

Name of Appellant (Block Letters)*	INLAND FISHERIES IRELAND
Address of Appellant	[redacted]
Eircode	[redacted]
Phone No.	[redacted] Email address (enter below)
Mobile No.	[redacted]

AQUACULTURE LICENCES APPEALS BOARD
28 SEP 2026
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* For administrative reasons, please provide one primary contact per appeal to which all correspondence in relation to the appeal will be sent. Please note if there is **any change** to the details given above, the onus is on the appellant to ensure that ALAB is notified accordingly.

FEES

Fees must be received by the closing date for receipt of appeals	Amount	Tick
An appeal by an applicant for a licence against a decision by the Minister in respect of that application	€380	
An appeal by the holder of a licence against the revocation or amendment of that licence by the Minister	€380	
An appeal by any other individual or organisation	€150	X
Request for an Oral Hearing* (fee payable in addition to appeal fee) *In the event that the Board decides not to hold an Oral Hearing the fee will not be refunded	€75	

Fees can be paid by way of Cheque or Electronic Funds Transfer

Cheques are payable to the Aquaculture Licences Appeals Board in accordance with the Aquaculture Licensing Appeals (Fees) Regulations, 2021 (S.I. No. 771 of 2021)

Electronic Funds Transfer Details	IBAN: IE89AIBK93104704051067	BIC: AIBKIE2D

Please note the following:

1. Failure to submit the appropriate fee with your appeal will result in your appeal being deemed invalid.
2. Payment of the correct fees **must be received on or before** the closing date for receipt of appeals, otherwise the appeal will not be accepted.
3. The appropriate fee (or a request for an oral hearing) must be submitted against each determination being appealed.
4. The joinder of Appeals 42 (1) does not give rise to an entitlement to a refund of any fee paid to ALAB.(Appendix 1)

The Legislation governing the appeals is set out at Appendix 1 below.

SUBJECT MATTER OF THE APPEAL

Inland Fisheries Ireland is appealing the granting of a salmon aquaculture licence to Silver King Seafood Ltd at site T06-202 (Deenish Island) on the grounds that the Appropriate Assessment (AA) does not substantively and adequately give consideration to issues of concern raised by us in our original submission in relation to the EIAR and NIS as part of the consultation process. The conclusion in the AA that, "the proposed operations will not pose a risk of adversely affecting (either directly or indirectly) the integrity of the Natura 2000 sites... and that there is no reasonable scientific doubt in relation to this conclusion" has not been demonstrated to IFI's satisfaction and further consideration of this matter is requested.

Site Reference Number: - (as allocated by the Department of Agriculture, Food, and the Marine)	Aquaculture Licence T06-202 (Deenish Island)

APPELLANT'S PARTICULAR INTEREST

Briefly outline your particular interest in the outcome of the appeal:

Inland Fisheries Ireland is the statutory agency charged with the management and protection of the inland fisheries of Ireland including the salmonid sea migrating species (wild Atlantic salmon and sea trout). The agency has a statutory responsibility to ensure that these species are not affected by the development.

GROUNDS OF APPEAL

State **in full** the grounds of appeal and the reasons, considerations, and arguments on which they are based) (if necessary, on additional page(s)):

The grounds of appeal and the reasons, considerations, and argument are detailed in the file attached named "IFI Grounds for Appeal" submitted with this appeal form.

ALAB
An Bord Achomhairc Um Cheadúnais Dobharshaothraithe
Aquaculture Licences Appeals Board

CONFIRMATION NOTICE ON EIA PORTAL (if required)

In accordance with Section 41(1) f of the Fisheries (Amendment) Act 1997, where an Environmental Impact Assessment (EIA) is required for the project in question, please provide a copy of the confirmation notice, or other evidence (such as the Portal ID Number) that the proposed aquaculture the subject of this appeal is included on the portal established under Section 172A of the Planning and Development Act 2000. (See Explanatory Note at Appendix 2 below for further information).

Please tick the relevant box below:

EIA Portal Confirmation Notice is enclosed with this Notice of Appeal	
Other evidence of Project's inclusion on EIA Portal is enclosed or set out below (such as the Portal ID Number)	X
An EIA was not completed in the Application stage/the Project does not appear on the EIA Portal	

Details of other evidence	Portal ID number 2021027

Signed by the Appellant	[signature]	Date	25/09/2026

Please note that this form will only be accepted by REGISTERED POST or handed in to the ALAB offices

Payment of fees must be received on or before the closing date for receipt of appeals, otherwise the appeal will be deemed invalid.

This Notice of Appeal should be completed under each heading, including all the documents, particulars, or information as specified in the notice and duly signed by the appellant, and may include such additional documents, particulars, or information relating to the appeal as the appellant considers necessary or appropriate."

DATA PROTECTION – The data collected for this purpose will be held by ALAB only as long as there is a business need to do so. Legal requirements in respect of transparency may necessitate the publication of appeal and appellant details may be included in an online list of appeals.

Appendix 1.

Extract from the Fisheries (Amendment) Act 1997 (No.23)

40. (1) A person aggrieved by a decision of the Minister on an application for an aquaculture licence or by the revocation or amendment of an aquaculture licence may, before the expiration of a period of one month beginning on the date of publication in accordance with this Act of that decision, or the notification to the person of the revocation or amendment, appeal to the Board against the decision, revocation or amendment, by serving on the Board a notice of appeal.

(2) A notice of appeal shall be served—

(a) by sending it by **registered post** to the Board,

(b) by **leaving it at the office of the Board**, during normal office hours, with a person who is apparently an employee of the Board, or

(c) by such other means as may be prescribed.

(3) The Board shall not consider an appeal notice of which is received by it later than the expiration of the period referred to in subsection (1)

41. (1) For an appeal under section 40 to be valid, the notice of appeal shall—

(a) be in writing,

(b) state the name and address of the appellant,

(c) state the subject matter of the appeal,

(d) state the appellant's particular interest in the outcome of the appeal,

(e) state in full the grounds of the appeal and the reasons, considerations and arguments on which they are based, and

(f) where an environmental impact assessment is required under Regulation 3 of the Aquaculture Appeals (Environmental Impact Assessment) Regulations 2012 (SI No 468 of 2012), include evidence of compliance with paragraph (3A) of the said Regulation 3, and

(g) **be accompanied by such fee**, if any, as may be payable in respect of such an appeal in accordance with regulations under *section 63*, and shall be accompanied by such documents, particulars or other information relating to the appeal as the appellant considers necessary or appropriate.

42. (1) The Board may, in its discretion, treat two or more appeals as, and the appellants as parties to, a single appeal and may at any time separate such appeals.

**Please contact the ALAB offices in advance to confirm office opening hours.

Appendix 2.

Explanatory Note: EIA Portal Confirmation Notice/Portal ID number

The EIA Portal is provided by the Department of Housing, Local Government and Heritage as an electronic notification to the public of requests for development consent that are accompanied by an Environmental Impact Assessment Report (EIA Applications). The purpose of the portal is to provide information necessary for facilitating early and effective opportunities to participate in environmental decision-making procedures.

The portal contains information on EIA applications made since 16 May 2017, including the competent authority(ies) to which they are submitted, the name of the applicant, a description of the project, as well as the location on a GIS map, as well as the Portal ID number. The portal is searchable by these metrics and can be accessed at:
https://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206c7e5f84b71f1

Section 41(1)(f) of the Fisheries (Amendment) Act 1997 requires that "*where an environmental impact assessment is required*" the notice of appeal shall show compliance with Regulation 3A of the Aquaculture Appeals (Environmental Impact Assessment) Regulations 2012 (S.I. 468/2012), as amended by the Aquaculture Appeals (Environmental Impact Assessment) (Amendment) Regulations 2019 (S.I. 279/2019) (The EIA Regulations)

Regulation 3A of the EIA Regulations requires that, in cases where an EIA is required because (i) the proposed aquaculture is of a class specified in Regulation 5(1)(a)(b)(c) or (d) of the Aquaculture (Licence Application) Regulations 1998 as amended – listed below, or (ii) the Minister has determined that an EIA was required as part of their consideration of an application for intensive fish farming, an appellant (that is, the party submitting the appeal to ALAB, including a third party appellant as the case may be) must provide evidence that the proposed aquaculture project that is the subject of the appeal is included on the EIA portal.

If you are a third-party appellant (that is, not the original applicant) and you are unsure if an EIA was carried out, or if you cannot find the relevant Portal ID number on the EIA portal at the link provided, please contact the Department of Housing, Local Government and Heritage for assistance before submitting your appeal form.

The Classes of aquaculture that are required to undergo an EIA specified in Regulation 5(1)(a)(b)(c) and (d) of the Aquaculture (Licence Application) Regulations 1998 S.I. 236 of 1998 as amended are:

a) Marine based intensive fish farm (other than for trial or research purposes where the output would not exceed 50 tonnes);
b) All fish breeding installations consisting of cage rearing in lakes;
c) All fish breeding installations upstream of drinking water intakes;
d) Other fresh-water fish breeding installations which would exceed 1 million smolts and with less than 1 cubic metre per second per 1 million smolts low flow diluting waters.

In addition, under Regulation 5(1) (e) of the 1998 Regulations, the Minister may, as part of his or her consideration of an application for intensive fish farming, make a determination under Regulation 4A that an EIA is required.

IFI grounds for appeal on the issuing of an Aquaculture Licence and a Foreshore Licence to Silver King Seafood Ltd at site T06-202 (Deenish Island)

Inland Fisheries Ireland (IFI) note the decision of the Minster to grant an Aquaculture and Foreshore licence to Silver King Seafood Ltd (Ref: T06/202). In general terms, it should be noted that IFI supports the sustainable development of the aquaculture industry in Ireland – the word sustainable is key and specifically encompasses sustainability of a development from an ecological as well as socio-economic point of view. Our submission under the consultation process can be viewed at https://assets.gov.ie/static/documents/49fc0ca7/1._2026.08.17_Submission_AGR_00994-26_Recommendation_to_grant_the_renew_and_review_application_of_an_Aquaculture_Licence_for_site_T06-202.pdf and should also be considered as an addendum to this appeal.

1. Overview of grounds for appeal

In summary, IFI is appealing the granting of this salmon aquaculture licence on the grounds that:

- Issues of concern raised by us in our original consultation submission were not substantively considered or addressed to our satisfaction in the Appropriate Assessment (AA) report or in the responses to our submission provided therein.
- As such, IFI consider that the potential for no adverse impacts associated with the development to wild salmonid interests has not been clearly demonstrated and reasonable scientific doubt remains. The conclusion made in the AA that, "the proposed operations will not pose a risk of adversely affecting (either directly or indirectly) the integrity of the Natura 2000 sites... and that there is no reasonable scientific doubt in relation to this conclusion" has not been established.
- In addition, the document *Submission AGR 00994-26: Recommendation to grant the renew and review application of an Aquaculture Licence for site T06-202* notes that "Issues raised by IFI have been addressed within the AA and EIA carried out in respect of this application". However, IFI is not satisfied that this is the case.
- It is also unsatisfactory that various information of relevance to the development were only provided through the AA document in an attempt to respond to issues raised during the consultation. Much of this information should already have been set out in the documents provided for the consultation to enable a more holistic appraisal of the application at that time. This highlights the inadequacies of the NIS and EIAR to fully inform the decision making process.

More specific information concerning our grounds for appeal are provided in the following sections.

2. Key points

The determination made that there will be no risk of adverse impacts to wild salmonid stocks (and associated fisheries) from the farm activities rely on a number of poorly supported assumptions, including:

- sea control measures are appropriate and will be effective;
- sea lice dispersal modelling used is an accurate reflection of field conditions; and
- escapes will not occur.

2.1 Sea lice control measures

It has not been demonstrated beyond a reasonable scientific doubt that sea lice control measures are sufficient to mitigate risks to wild salmonids for the following reasons:

- No scientific evidence-base is provided to justify the appropriateness of the treatment trigger threshold levels to protect wild salmonids.
- Total level of stocking and production is not considered when assessing lice loads and determining treatment trigger thresholds.
- Existing lice monitoring and control protocols are not specifically formulated to protect wild salmon.
- The efficacy and use of cleaner fish to control sea lice has not been satisfactorily demonstrated.

2.1.1 Proposed sea lice control measures

The code of practice for this pest control in Ireland is not, in the view of IFI, adequately robust to ensure the protection of wild salmon smolts and sea trout from sea lice emanating from the salmon farm. A recent scientific publication by Vormedal (2024) (*Sea-lice regulation in salmon-farming countries: how science shape policies for protecting wild salmon*), notes that in Ireland, "There was no scientific evidence-base or analysis conducted to justify the threshold level" [of an average of 0.5 egg-bearing lice]; "The 0.5 trigger level for treatment was intended to be precautionary, to ensure mitigation of potentially negative effects of farm sea lice. However, setting the level at 0.5 was also a pragmatic decision anchored in farm data, taking into consideration what was achievable." Related to this deficit, we consider that the total level of stocking and production (at the proposed site and in the bay as a whole) should be the key consideration when assessing lice loads in relation to determining treatment trigger levels in the context of their consequent risks to wild salmonids rather than using an average measure of lice levels on the farmed salmon to make such determinations. This is supported by a recent study published by Larsen *et al.* (2024), whose analyses of Norwegian fisheries demonstrated that catches of wild salmon were below that expected in some salmon farming areas where the total sea-louse load exceeds the limit of 0.1 average adult female sea louse per farmed fish. The authors concluded that, "in the context of allowing further growth in farmed salmon biomass, setting absolute sea-louse limits for entire production areas may be a more effective regulatory instrument than setting average lice limits per farmed fish."

The North Atlantic Salmon Conservation Organisation (NASCO) 'Guidance on Best Management Practices to address impacts of sea lice on wild salmon stocks' note that, "Lice control management programmes" should be "appropriate to the number of fish in the management area". Further to this, the review of Ireland's NASCO Implementation Plan found that the standard existing lice monitoring and control protocols used already in salmon farms in Ireland to attempt to fulfil the NASCO goal (that 100% of farms have effective sea lice management such that there is no increase in sea lice loads or lice-induced mortality of wild salmonids attributable to the farms) "is not specific in protecting wild salmon" and "it is not clear...how this action will enable progress towards achievement of the goals for effective sea lice management" to ensure wild salmonids are protected.

[redacted]

2.1.2 Efficacy of cleaner fish to control sea lice is uncertain

A recent review in the journal *Aquaculture Environment Interactions* on the use of cleaner fish to control sea lice in salmon farms contends that their use has been adopted too rapidly by the industry and has lacked sound evidence on their efficacy and welfare at commercial scale (Overton *et al.* 2026). It further recommends that use of cleaner fish be phased out by 2029 in Norway and notes that the use of wild-caught wrasse has the weakest evidence base on efficacy and welfare, in addition to risks associated with biosecurity and negative impacts on the wild source populations. This challenges the presumption made that cleaner fish will be effective means to manage lice on the farm including during the harvest period when some other treatments options may not be available.

Related to this, the ascertain is made in the AA documentation that the use of wild sourced cleaner fish is a sustainable practice. However, no evidential basis has been provided to support this. IFI continue to have concerns in this regard as detailed in our consultation submission.

2.2 Uncertainty of the sea lice dispersal modelling to reliably reflect actual field conditions

In our consultation submission, we highlighted a number of important deficiencies in the sea lice dispersal modelling used that provide uncertainty in its ability to accurately reflect field conditions. These have not been substantively resolved to IFI's satisfaction in the commentary contained in the subsequent AA report. Indeed IFI note with interest the commentary provided by the Marine Institute here in response to aspects of the issues we raised and this commentary also appears to support at least some of these concerns. As such, it is IFI's view that the modelling approach in its current form cannot be relied upon to support the conclusions made in the AA and consultation documents. This provides reasonable scientific doubt to the conclusion that there is no significant risk posed to wild salmonids in the region around the farm from dispersed sea lice. In this context, associated assumptions are made that cross-over with wild salmonid migration pathways and residence areas are unlikely. However, no substantive evidence is provided to support this.

2.3 Consideration of the risk to wild salmon populations from escapes

IFI note the information provided by the Marine Institute in the AA report in response to the public consultation which states that, "The exposed nature of this site means there is a real risk of equipment failure, which could result in fish escapes." It is important to highlight that escape events have occurred in salmon farms in Ireland including in recent years for a variety of reasons (including storm related damage) despite standard containment protocols being in place. The ability of operators or the responsible authorities to competently respond to escape events and minimise the risk of subsequent interbreeding with wild salmon has not been adequately demonstrated to date. In addition to this, the potential dispersal capacity of escaped farmed salmon entering river systems can range over a hundred kilometres from the source (as evidenced by the Killary escape event in 2024 as outlined in our consultation submission). Therefore, the zone of influence used to evaluate potential impacts is not considered appropriate. Consideration of likely significant effects and the zone of influence should be based on the source-pathway-receptor model, specific to the context of the assessment, and not based on an arbitrary distance such as 15 km. In consideration of a fish farm application, the pathway from source to receptor should consider the dispersal pathways of farm escapees from the source, along hydrologically-connected pathways (in this case, open coastal zones into rivers). The zone of influence should therefore include as receptors any potential rivers that fall

within the potential dispersal range of farm escapees and that include Atlantic salmon or freshwater pearl mussel as an SAC Qualifying Interest.

Related to this, a recent NASCO *Policy Brief on the Effect of Salmon Aquaculture on Wild Atlantic Salmon* (NASCO 2025) not available at the time of the consultation, provides an up-to-date summary of the serious threat posed to wild salmon populations from salmon aquaculture escapes. This brief was compiled by leading scientists in this field of expertise based on their ongoing review, *'Genetic introgression of farmed Atlantic salmon in wild salmon populations throughout its native range'*. The brief reports that, "genetic introgression was detected in 57 % (275) of the investigated rivers, throughout the North Atlantic" and notes that, "Introgression of wild Atlantic salmon is widespread across the North Atlantic and is the most serious threat for the viability and ability to adapt to current and future environmental changes."

In general, the lack of any environmental impact assessment of the potential threat of an escape of up to 650,000 farmed salmon present to wild salmon stocks in the wider vicinity of the proposed operation is considered a major deficit in the consideration of potential impacts. Indeed, information presented in the consultation documentation on the potential impact of escapes makes a strong argument for the precautionary principal to be applied in that there may be considerable risk of ecological damage from escape events. It is notable that a recently published report from Ireland not available at the time of submission, has found farmed salmon genes in approximately one third of the wild salmon river populations sampled (Anon. 2026). In addition, in Norway the degree of genetic introgression from farmed salmon in the 250 wild stocks assessed in 2024 indicates *that more than 30% of the wild populations are classified as "poor", with evidence of large genetic changes due to introgression* (https://www.nina.no/english/About-NINA/News/article/new-digital-portal-shows-interbreeding-between-wild-and-farmed-atlantic-salmon). Although the Irish industry is much smaller than that in Norway, and the prevalence of introgression in individual stocks is currently low overall, these studies highlights the risks posed by escapes to wild salmon populations. Such risk information was not provided in the consultation documentation or considered in any detail.

2.4 Insufficient regard given to the weight of evidence concerning the risk of sea lice to wild salmonids and the uncertainty of the efficacy of proposed measures to mitigate this

In our consultation submission, IFI highlighted the risks posed to wild salmonids from sea lice associated with salmon farming activities by providing reference to extensive peer-reviewed scientific literature documenting these risks and impacts. IFI consider that sufficient regard was not given to this in reaching the conclusions made that adverse effects on wild salmonids are unlikely and there is no reasonable scientific doubt in this regard. This was particularly evident in the EIAR and NIS documentation and raises uncertainty about whether assessments have been made with consideration to complete, up-to-date and best available scientific knowledge. This should be re-considered further in the context of the uncertainty of the efficacy of the mitigation measures proposed to control lice at a level where wild salmonids are not at risk and in the context of the limitation of the other related assumptions made (e.g. sea lice dispersal modelling).

Related to the above, the recent publication of Gargan *et al.* (2025a; b) is of note. It was not available at the time of our submission. This study investigated how sea lice infestation pressure from salmon farms in Ireland affected the marine survival of Atlantic salmon in the wild. The study incorporated the data used in Jackson *et al.* 2013 along with more recent unpublished data, in total comprising a period from 2001 to 2019. The results showed returns of untreated adults were 19% lower than adults

in the group treated with a prophylactic against sea lice and that increased lice infestation pressure from nearby salmon farms heightened this risk.

In addition, a recent NASCO *Policy Brief on the Effect of Salmon Aquaculture on Wild Atlantic Salmon* (NASCO 2025) also not available at the time of the consultation provides an up-to-date summary of the potential impacts of sea lice associated with the farm on wild salmonids. This brief was compiled by leading scientists in this field of expertise based on their ongoing review, *'Does exposure to sea lice from aquaculture have a population-reducing effect on wild Atlantic salmon? A systematic review'*. The key findings are as follows:

- evidence indicates that salmon lice from aquaculture negatively affects wild Atlantic salmon populations. Systematic review data show a reduction in survival and adult returns in salmon exposed to salmon lice;
- increased mortality linked to salmon lice infestations is documented in countries with significant salmon aquaculture, including Norway, Ireland, and Scotland, suggesting a widespread impact across the North Atlantic; and
- studies show a degree of bias due to limitations in study design, including inadequate documentation of salmon lice levels during out migration and the effectiveness of anti-parasitic treatments. These biases suggest that the true impact of salmon lice on wild salmon populations may be greater than current estimates.

Indeed, recent work indicates that sea lice impacts on salmon in randomised control trials such as those quoted above could be underestimated, as the survival of salmon smolts may be reduced by lower treatment efficacy attributed to increased resistance among sea lice (Vollset *et al.* 2023; Gargan *et al.* 2025 a, b) and by the treatment itself (Lennox *et al.* 2020; Gargan *et al.* 2025 a, b). In any case, the ICES (2016) WKCULEF report states that it is, "also true that a small incremental increase in marine mortality due to sea lice (or any other factor) can result in losses of salmon abundance that are relevant for fisheries and conservation management". These points are important to note in the context of the information provided in the consultation documentation and the AA report related to this issue.

2.5 No alternatives were considered as required for EIAs

In considering of alternatives, the EIAR states that, "The project area was identified as a suitable location for the proposed salmon farming .... [as it] is an existing site where salmon production has been carried out successfully for over 20 years with negligible impact on the environment". However, no alternatives for production are considered. Salmon farming technology has developed since that time including the recent movement to land-based alternatives which essentially eliminate the risk from escapes, sea lice and disease to wild salmonids; minimise any potential impacts to the receiving marine environment; and even mitigate for the impacts of climate change on farm production. This was not appraised in the NIS / EIA. As the introductory text in the EIAR states it is a requirement under the 2014 Directive to contain a *description of the reasonable alternatives studied by the developer* and 2011 Directive to include *an outline of the main alternatives studied by the developer and an indication of the main reasons for his choice, taking into account the environmental effects*.

[redacted]

3 Concluding remarks

For the reasons outlined above, Inland Fisheries Ireland considers that it has not been adequately demonstrated that this development will pose no significant risks of adverse impacts to wild salmonid interests, and as a consequence, reasonable scientific doubt remains in this regard that requires further reconsideration and evaluation.

4. References

Anon. (2026). An Assessment of the Level of Genetic Introgression in Irish Wild Salmon Populations from Farmed Escaped Salmon (GeneFlow). Marine Institute Report Series, EMFAF Operational Programme 2021–2027.

Gargan *et al.* (2025a). Salmon lice from aquaculture reduce marine survival of Atlantic salmon. *Journal of Animal Ecology*, 94(7): 1346–1360.

Gargan *et al.* (2025b). Correction to 'Salmon lice from aquaculture reduce marine survival of Atlantic salmon'. *Journal of Animal Ecology*, 94(9): 1879-1883.

ICES (2016). Report of the Workshop to address the NASCO request for advice on possible effects of salmonid aquaculture on wild Atlantic salmon populations in the North Atlantic (WKCULEF), 1–3 March 2016, Charlottenlund, Denmark. ICES CM 2016/ACOM:42. 44 pp.

Jackson *et al.* (2013). Impact of *Lepeophtheirus salmonis* infestations on migrating Atlantic salmon, *Salmo salar* L., smolts at eight locations in Ireland with an analysis of lice-induced marine mortality. *J Fish Dis* 36: 273–281

Larsen *et al.* (2024). Negative association of sea lice from fish farms on recreational fishing catches of Atlantic salmon. *Journal of Applied Ecology*, 61(8)1772-1783.

Lennox *et al.* (2020). Negative impacts of the sea lice prophylactic emamectin benzoate on the survival of hatchery released salmon smolts in rivers. *Aquatic Toxicology*, 224, 105519

NASCO (2009). Guidance on Best Management Practices to address impacts of sea lice and escaped farmed salmon on wild salmon stock. SLG(09)5. North Atlantic Salmon Conservation Organisation, 3 pp.

NASCO (2025). Policy Brief on the Effect of Salmon Aquaculture on Wild Atlantic Salmon Populations. CNL(25)18. North Atlantic Salmon Conservation Organisation, 4 pp.

Overton *et al.* (2026). The rise and fall of cleaner fish use in Norwegian salmon farming. *Aquaculture Environment Interactions* 18:aei00520 https://doi.org/10.3354/aei00520

Vollset *et al.* (2023). Direct evidence of increased natural mortality of a wild fish caused by parasite spillback from domestic conspecifics. *Proceedings of the Royal Society B: Biological Sciences*, 290(1991), 20221752.

Vormedal, I. (2024). Sea-lice regulation in salmon-farming countries: how science shape policies for protecting wild salmon. *Aquaculture International*, 32(3): 2279-2295.

Hand delivered
28/9/26

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28 SEP 2026
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