

1 **'Offshore' salmon aquaculture and identifying the needs for**
2 **environmental regulation.**

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20 **Abstract**

21 'Offshore' aquaculture has gained increased attention as a potential route of expanding production of
22 commercially important finfish species such as Atlantic salmon (*Salmo salar*). However, there is a lack
23 of clarity about the term 'offshore' and how different 'offshore' environments are, compared to more
24 traditional coastal or inshore locations. This uncertainty is an issue for effective governance and
25 regulation and is a bottleneck for development that must be addressed. This study used a mixed
26 method approach to evaluate what is meant by 'offshore' production and determine if existing
27 approaches are suitable for licensing and regulating 'offshore' salmon aquaculture in Scotland, as a
28 case study. First, a systematic literature review was used to assess academic studies and then an online
29 questionnaire was used to gather views from salmon aquaculture stakeholders in Scotland and other
30 countries. The results show there is inconsistency in what is perceived by the term 'offshore'
31 aquaculture, making it challenging to determine a global definition. Literature, which was not limited
32 to salmon production, tended to focus on distance from the coast but salmon aquaculture
33 stakeholders had very mixed views, though a slight majority considered wave exposure was the key
34 characteristic. The stakeholders indicated there may be a number of benefits of 'offshore' salmon
35 aquaculture, but also suggested that existing regulations are not appropriate for 'offshore' salmon
36 production and could be enhanced. The study results suggest that regulators and stakeholders need
37 to agree on consistent terminology that characterises the production environment. Depending on
38 local or regional complexities, several classifications that reflect key features, may be required.
39 Additionally, new or adapted approaches to aquaculture licensing, regulation and site suitability may
40 also be needed to account for physical and ecological differences from more traditional farming
41 locations. Ultimately, environmental regulation will only be fit-for-purpose if it is evidence-based and
42 relevant to the environmental conditions, surrounding ecosystem, and species being produced.
43 Ironically, the biggest constraint to 'offshore' aquaculture regulation seems to be understanding what
44 'offshore' is and means, and until this is addressed there will continue to be uncertainty and confusion
45 that hinders development of the sector.

46 **Key words:** Aquaculture planning, exposed, offshore aquaculture, regulation, salmon farming, site
47 selection.

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49 **Highlights**

- 50 • Regulation is a bottleneck that is limiting expansion of 'offshore' aquaculture
- 51 • Inconsistency in how 'offshore' aquaculture is defined is creating confusion and uncertainty
- 52 • 'Offshore' regulation must be relevant to the environment, species, and production method

53

54 **1. Introduction**

55 Coastal regions are highly productive and an important resource for food production through
56 aquaculture and fisheries. However, there is considerable competition and conflict from other users,
57 so space for expansion of aquaculture is often limited (Sanchez-Jerez et al. 2016). Such constraints
58 could affect contributions to global food supply as demand for aquatic products continues to rise (FAO,
59 2018). Thus, in many areas, if the aquaculture industry is to grow and increase production, there is a
60 need to consider other locations. One of the alternatives to coastal farms is the use of so called
61 'offshore' sites, and consequently 'offshore' aquaculture has gained increased attention in recent
62 years for both fish and shellfish (Jansen et al., 2016; Gentry et al., 2016; Barillé et al., 2020).

63 In 2010 the Food and Agricultural Organization of the United Nations (FAO) held a workshop that
64 classified mariculture into three categories based on site location (coastal, off the coast and offshore).
65 The expert group defined mariculture as *"offshore when it is located > 2 km or out of sight from the*
66 *coast, in water depths > 50 m, with waves heights of 5 m or more, ocean swells, variable winds and*
67 *strong ocean currents, in locations that are exposed (open sea, e.g. $\geq 180^\circ$ open) and where there is a*
68 *requirement for remote operations, automated feeding, and where remote monitoring of operating*

69 *system may be required*" (Lovatelli et al., 2013). This definition is prescriptive and consequently only
70 relevant at present to few existing or exploited sites. The workshop did not define 'off the coast'
71 mariculture, meaning there is still confusion in perceptions on what 'offshore' or 'non-coastal'
72 aquaculture is, and so how it should be included in regulation and governance. Most regulatory
73 systems for fish-cage mariculture have been developed for inshore sites. Through an extensive
74 analysis of primary and grey literature, Froehlich et al. (2017) have shown there is inconsistency in
75 definitions of 'offshore' and often the descriptions cover sites or areas that are closer to the coast and
76 shallower depths than one might originally expect. These descriptions do not conform to the FAO
77 definition outlined in Lovatelli et al. (2013). The 'offshore' wind sector has had similar issues, where
78 there are differences in opinion of what 'offshore' means, as some people consider 'offshore' to be a
79 considerable distance out to sea in open-ocean conditions, while others use the term literally as "*off*
80 *the shore and located in the sea*" (Haggett, 2008). The contrasting environmental conditions of coastal
81 areas and open sea have different implications for aquaculture operations, but the term 'offshore'
82 covers a range of conditions across studies and opinion. Thus, the lack of clarity surrounding 'offshore'
83 is a key issue for aquaculture planning, licensing and regulation and must be urgently addressed.

84 Most countries have a formal planning and licensing process for establishing fish farms and this will
85 involve meeting certain criteria and providing information on the proposed site and potential impacts
86 (Bankes et al., 2016; Carter, 2018). Once a fish farm has been developed, producers must meet
87 statutory requirements and operate in compliance with environmental limits that have been set by
88 regulatory authorities (McGhee et al., 2019). The limits are established based on scientific evidence
89 and vary between species due to the differences in how they interact with the environment (FAO,
90 2009). The scientific evidence is based on knowledge of existing sites, so if farms are to be established
91 in new areas 'offshore' then this may require revised regulations and/or new monitoring protocols
92 that are more relevant for those conditions (Roberts et al., 2014). Furthermore, the other activities
93 and user groups in 'offshore' environments may be very different to inshore locations, so multi-use
94 governance arrangements will need to be developed (Krause and Stead, 2018).

95 Atlantic salmon (*Salmo salar*) is an important farmed fish species due to its nutritional benefits and
96 popularity with consumers (Sprague et al., 2016). The salmon aquaculture industry is an important
97 economic activity in several countries, contributing to national economies and trade, while also
98 providing an important livelihood to many local communities, often in rural locations (McGhee et al.,
99 2019). In 2016, total annual production of salmon was 2.25 million tonnes, with Norway, Chile and
100 Scotland responsible for 54%, 24%, and 7% respectively (FAO, 2018). Salmon is one of the key focusses
101 for 'offshore' aquaculture, and industry press examples highlight some of the research and
102 development that is underway, particularly testing of cage technology (e.g. Garcés, 2019; Holland,
103 2020; Poulsen, 2020).

104 The aim of this study was to evaluate what is understood by 'offshore' salmon production and
105 determine if existing approaches are suitable for planning, licensing and regulation. A mixed-method
106 approach was used that included a systematic literature review followed by a stakeholder
107 questionnaire. The study primarily focused on Scotland, though broader context is provided via
108 responses and inputs from other countries. Salmon production has changed significantly since its
109 inception in Scotland and it has become a highly innovative industry for the country (Peel and Lloyd,
110 2008; Peel and Lloyd, 2014). At present, the Scottish salmon industry is in a period of growth and
111 transition (McGhee et al., 2019), and to ensure sustainability and long-term success is achieved, the
112 exploration of new sites is essential as there are limited opportunities for further development within
113 sheltered sea embayments. A new regulatory framework for marine finfish aquaculture in Scotland
114 has been established, but 'offshore' production is not specifically mentioned (SEPA, 2019). This makes
115 Scotland a good case study as 'offshore' sites may be part of the future of the Scottish salmon industry.
116 Though Scotland is the primary focus, the results are relevant to all countries that are considering
117 'offshore' aquaculture of any fish or shellfish species.

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120 **2. Methods**

121 A mixed method approach of systematic literature review followed by online stakeholder
122 questionnaires was used to gather a combination of qualitative and quantitative data for further
123 analysis. An important consideration was to identify if there is any disparity between scientific
124 research and stakeholder views, with the review of primary literature providing an insight into
125 research and academic studies, and the online questionnaires capturing the thoughts and experience
126 of stakeholders to help fill knowledge gaps from outcomes of the review.

127 **2.1 Review of literature**

128 A review of literature was completed following the guidance set in place by Preferred Reporting Items
129 for Systematic Reviews and Meta-Analysis (PRISMA) (Moher *et al.* 2009). The review process is given
130 in Figure 1. An initial search of literature took place using the literature database found on both Scopus
131 and Web of Science online databases. Three key search terms were used on Scopus using the phrases:
132 'offshore' AND 'aquaculture' OR 'fish farming'. To narrow the search results even further the search
133 was limited to 'Title, Abstract and Keywords'. This revealed 911 items from January 1970 to July 2019.
134 The same search terms were used in Web of Science to obtain any relevant literature missed from the
135 Scopus database. This uncovered 195 items with dates spanning 1970 to July 2019. Both search results
136 were collated, and duplicates (131 items) removed, to give a total of 975 records. The titles and
137 abstracts were then screened to identify the most relevant literature and disregard irrelevant items
138 (613 were excluded). During the final eligibility assessment, the full text of 362 articles was assessed,
139 from which 119 articles were selected for the final evaluation. These articles were selected for
140 evaluation as they were most relevant in relation to the aims set out for this paper, focusing on the
141 key topics of 'offshore' aquaculture, regulation, and governance and/or environmental
142 implementations of the aquaculture industry.

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144 **2.2 Online questionnaires**

145 The questionnaire used in this study comprised of 16 questions consisting of multiple choice,
146 scale/rank and short answer text questions (see Table 1). Its purpose was to pick up on issues raised
147 in the literature review and inquire further with 39 targeted stakeholders with known and extensive
148 expertise in the field. The limited number of stakeholders contacted was not designed to be of
149 statistical relevance, but to ensure that they had experience to give an informed answer to the
150 questions. The literature review highlighted areas that needed further investigation; relating to
151 environmental issues and regulation, biological and technological factors within offshore
152 environments, and how is 'offshore aquaculture' defined. Consequently, Questions 1 to 3 were
153 designed to collect demographic information on the respondents. Questions 4 to 7 were designed to
154 assess the respondents' opinions on present issues with salmon farming and explore a need for
155 offshore aquaculture. Questions 8 to 16 were designed to gain further information on environmental
156 and regulatory issues, and biological and technological issues in relation to offshore aquaculture and
157 on the definition of 'offshore'.

158 JISC online surveys (JISC, 2019) was used to construct and carry out the online questionnaire. This
159 software package has a wide range of features allowing a variation in question types to be produced,
160 to obtain both qualitative and quantitative results. The 39 participants, each acknowledged to have
161 experience and knowledge of salmon production and regulation, from different aquaculture and
162 related organisations were specifically targeted by email¹ with links to the online survey. The
163 organisations included feed companies, production companies, NGOs, regulators, research
164 academics, consultants, industry representative bodies, and equipment suppliers and manufacturers.
165 Participants were from a number of different countries: Scotland, Norway, USA, Canada, Chile and

¹ According to procedures outlined under the General Data Protection Regulations EC/2016/679 (under Data Protection Act 2018, UK).

166 China. All of participants were involved in salmon production and assessing the use of 'offshore' cage
167 systems.

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169 **3. Results**

170 **3.1 Literature review results**

171 Once compiled it was found that most of the reviewed articles could be assigned into 3 distinct
172 thematic groups, "Technical feasibility", "Biology" and "Environmental impact". Those that could not
173 be assigned were classed as "other". Where articles fell into more than one thematic group, the most
174 predominant subject represented was used during the assignment process. The theme, description
175 and number of articles in each group is given in Table 2. Of those reviewed, most concerned
176 'Environmental impact' (52 articles, 44% of the total), and biology (30 articles, 25%), with technical
177 feasibility of the systems accounting for 18 articles (15%).

178 The distribution of number of articles and their themes, from January 1986 to July 2019, are given in
179 Figure 2 and show an increase in publication over time. From January 2004 to July 2019 numbers of
180 articles for "Technical feasibility" and "Biology" remained relatively consistent. However, the
181 "Environmental impact" theme showed a consistent increase from 2016 and especially from January
182 2018, suggesting that published research in development of 'offshore' technology and production is
183 consistent, but interest in environmental impacts of 'offshore' aquaculture are becoming a more
184 important consideration and focus recently.

185 The studies found covered a range of species, though for ease of analysis were divided into three
186 groups; finfish, shellfish and 'not specified'. There were 70 studies on finfish, 11 studies on shellfish,
187 and 38 studies that did not fit into a specific category. The number of articles related to shellfish
188 aquaculture showed an increase from 2014 onwards to date, whereas the number of articles related
189 to finfish aquaculture tended to fluctuate initially with an increase since January 2018. Finfish research

190 focussed most specifically on salmon aquaculture with 27 (39%) out of the 70 articles relating to the
191 salmon industry.

192 Though most papers did not refer to a location for the research, those that did were spread over 16
193 countries. Most of these related specifically to salmon producing countries and aquaculture systems,
194 but also included 'offshore' research in the Mediterranean with seabass and seabream, as well as fish
195 cage culture along the coasts of Indonesia and Malaysia. Most papers which referred to environmental
196 impacts were associated with salmon and salmon producing countries (Norway, Chile, Scotland,
197 Canada, Australia, USA and China), with most papers being relevant to the USA and China. However,
198 in addition, there was interest in development of 'offshore' aquaculture in the Gulf of Mexico, the
199 Mediterranean Sea, the North Sea and off the coast of Indonesia. A breakdown of the 16 countries
200 where studies on offshore aquaculture are being undertaken and the number of publications relevant
201 to those countries is given in Figure 3.

202 A definition for 'offshore' aquaculture was given in only 11 of the 119 articles (9%) reviewed suggesting
203 that there is either little consideration or an implicit assumption of what 'offshore' aquaculture
204 actually means. For the 11 studies where a definition was found there was significant variation based
205 on physical factors such as distance, for example >2 km from shore (Bostock *et al.* 2010) or out of site
206 from the coast (Buck and Langan. 2017), considering a depth of >20 m (Lester *et al.* 2018), or 30 – 60
207 m (Ferreira *et al.* 2014), and/or focusing on wave exposure (Gentry *et al.* 2017). However, since only
208 a small number of definitions were provided, it is difficult to determine a definitive definition from
209 these results. 'Distance from the shore' and, a combination of both 'water depth' and 'distance from
210 the shore' were the two most popular criteria used. This suggests that the term 'offshore' in academic
211 publications is considered as a function of distance from shore rather than exposed environments.

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214 **3.2 Dictionary review results**

215 To determine a clear and general definition for the term 'offshore', an analysis of online dictionaries
216 was conducted. Eight of the most well used online dictionaries were evaluated, with the same term
217 of 'offshore' inserted into each search engine. The dictionaries and corresponding definitions for the
218 term 'offshore' are given in Table 3. Out of the eight dictionaries analysed, all suggested that the term
219 is derived as a 'distance'. Though there are no values included, several of the definitions emphasised
220 at 'some distance' from the coast which implies a considerable distance from the coast rather than
221 close proximity. Public perception can be influenced by what is promoted to them, and this is true
222 when it comes to defining the term 'offshore'. Consequently, it may be reasonable to assume that,
223 based on the dictionary definitions, the general public would perceive 'offshore' aquaculture to be at
224 a considerable distance from the coast.

225 **3.3 Questionnaire results**

226 The scope of the questions was constructed to investigate the environmental differences and likely
227 sensitivities between inshore and 'offshore' environments. They were formulated to relate to the aims
228 set out for the paper, to identify what stakeholders perceive as the environmental regulations and
229 implementations of governance for 'offshore' aquaculture are, whilst determining how 'offshore'
230 production could be a satisfactory solution for environmental sustainability of the salmon industry.

231 In total there were 21 questionnaire responses from 39 targeted stakeholders (54%), representing all
232 countries contacted; Scotland (11), Norway (2), USA (1), Canada (1), Chile (1) and China (5) (Question
233 1). Respondents from Scotland represented the largest national group, with relatively low numbers
234 from other salmon producing countries, therefore respondents were collated into two groups -
235 Scotland, and 'Outside Scotland' (Norway, USA, Canada, Chile and China) – for further interpretation.
236 However, the background expertise of the respondents for these two regions (Questions 2 and 3) were
237 skewed with Scotland having a wide range of different stakeholder types, whereas the 'Outside

238 Scotland' countries they were less diverse, with a strong representation by academics. Table 4 shows
239 a breakdown of stakeholders for each country and their experience. The different range of
240 stakeholders in the different regions may lead to skewed opinion and outcomes, suggesting that the
241 wider stakeholder range for Scotland are more representative of the salmon aquaculture sector, as a
242 whole.

243 Further background questions about the existing situation (Question 4) indicated that most
244 respondents for both groups, Scotland and 'Outside Scotland', and across all stakeholders found that
245 their existing regulatory systems do not meet the needs of the salmon industry. Scottish respondents
246 felt there was more space to expand aquaculture in the coastal environment than the 'Outside
247 Scotland' countries (Question 6), though this comparison could have been due to the large percentage
248 of academic respondents in the latter. All stakeholder types in both regions felt that at present sea
249 lice and disease transfer were biggest environmental issues for the salmon industry at present
250 (Question 7). The presence of predators and visual impacts of the farms were considered the least
251 important, see Table 5.

252 Results from the open question (Question 8) "*How would you define 'offshore' aquaculture?*" were
253 compiled into seven categories which were most fitting in terms of the response. These are presented
254 in Figure 4. In contrast to the results from the literature review and dictionary analysis (Sections 3.1
255 and 3.2) that highlighted distance as the key factor, questionnaire responses were mixed, though
256 descriptions that contained waves ('wave exposure', 'wave and depth', 'wave, depth and distance')
257 had a slightly higher majority (11 respondents in total, 6 for Scotland and 5 for Outside Scotland).
258 Distance (defined as 'Distance', 'Depth and distance', 'Wave, depth, and distance') was seen as the
259 second most important factor (9 respondents in total, 4 for Scotland, and 5 for Outside Scotland), with
260 depth ('Depth', 'Depth and distance', 'Wave, depth and distance') being least popular choice (7
261 respondents in total, 3 for Scotland, and 4 for Outside Scotland). One respondent suggested the
262 definition of 'offshore' should be related to specific technology, monitoring and regulation, and

263 economics required in 'offshore' locations, rather than the environment (description under Other in
264 Figure 4). Several respondents commented that alternative terminology to 'offshore' such as 'open
265 sea' or 'high energy' would be more useful as this describes the dispersive characteristics of the site
266 and that is an important feature that should be the focus of new sites rather than an arbitrary distance.

267 Participants were asked to select one option from the Likert Scale (Extremely likely, Likely, Neutral,
268 Unlikely, and Extremely unlikely) to answer the question (Question 9) "*How likely do you think*
269 *aquaculture will move to 'offshore' in the next ten years?*" Responses are presented by stakeholder
270 and country groupings in Figure 5. Four out of the twenty-one respondents (19%) were undecided or
271 felt that a move to 'offshore' aquaculture was unlikely during the next decade while the remaining
272 seventeen (81%) assured that 'offshore' development is either likely or extremely likely to take place.
273 There was clear similarity in responses between the two country groups (see Figure 5). Of the 11
274 Scottish respondents, six considered it likely and a further three thought it was extremely likely that
275 aquaculture will move offshore. Only the environmental regulator suggested this was unlikely.

276 To obtain an overview of perceived benefits and risks of 'offshore' aquaculture, participants were
277 asked (Question 10) to select one option from the Likert Scale (Much better, Somewhat better, About
278 the same, Somewhat worse, and Much worse), in association to whether they think that 'offshore'
279 aquaculture will offer advantages in comparison with inshore aquaculture under six categories. A
280 relative percentage was then determined for each response within its category and presented in
281 Figure 6. It is evident that, for each of the areas, 'offshore' aquaculture was perceived as being
282 advantageous or "the same" compared to inshore aquaculture. Only a small percentage of
283 participants considered it would be worse. In particular, public perception, environmental
284 sustainability and production potential were considered 'much better' for 'offshore' aquaculture.
285 However, it was thought that factors related to the fish (health/welfare and disease risk) would have
286 no advantage in 'offshore' systems, and in some cases be worse. Interestingly, the majority of

287 respondents (85%) considered that there would also be no advantage for aquaculture practice in
288 relation to impact from climate change if moved into more 'offshore' environments.

289 Participants were asked (Question 12) to select one option from the 3-point scale (Yes, No, and
290 Unsure), in answer to whether they think that there are suitable techniques available for 'offshore'
291 salmon farmers to measure and monitor impacts of salmon production on the environment in their
292 country. The responses by stakeholder and country groups are given in Figure 7. Results show different
293 opinions found between the stakeholders and by country groups. In Scotland there was relatively
294 more confidence by industry stakeholders that techniques for suitable environmental monitoring
295 were available, though several stakeholders including the environmental regulator were still unsure.
296 The 'Outside Scotland' stakeholders generally believed that these techniques were not yet available.
297 The difference this could be because due to the higher number of academic and low number of
298 industry stakeholders in the 'Outside Scotland' region and that there was little consensus of what
299 'offshore' means between the groups. (see Figure 4).

300 Figure 8 shows percentage responses from a Likert Scale (Strongly agree, Agree, Neutral, Disagree,
301 and Strongly disagree) for eight topics related to the availability of knowledge and research (Question
302 13) to ensure the success of salmon aquaculture in 'offshore' environments. Respondents suggested
303 that there was a lack of knowledge available on regulation cost/finance and operational issues, but
304 more was known about the technology needed, and suitability of 'offshore' sites for salmon
305 aquaculture. Environmental monitoring and modelling gave a mixed response, with there being both
306 agreement and disagreement from the various stakeholders.

307 These results suggest that though it is believed the technology is available to exploit these
308 environments, there is still some doubt about whether enough is known or understood about
309 environmental monitoring/modelling, regulation and finance issues to ensure environmental and
310 economic sustainability of these systems. A respondent highlighted that "*currently there are no*
311 *protocols for environmental monitoring of 'offshore' sites*", many respondents noted that further

312 research will be required to ensure appropriate techniques are developed for these complex systems.
313 It was noted that modelling techniques for physical characteristics for the 'offshore' environment have
314 been established by other sectors. To support sustainable development of 'offshore' aquaculture, a
315 respondent suggested that *"a broader ecosystem approach to environmental monitoring might be
316 required to guarantee sustainable farming"*. The stakeholder also noted that changes in
317 environmental conditions due to 'offshore' production will have changes in the wider ecology and
318 different food web dynamics to those commonly found at inshore sites. So further research into the
319 different conditions and the impact of aquaculture is required before licenses are granted in such
320 areas.

321 As previously mentioned, the respondents suggested that there is enough knowledge and research
322 available for technology to ensure the success of salmon aquaculture in 'offshore' locations. A point
323 was addressed by a respondent that *"as technology advances, so too will the development of locations
324 previously unexplored for marine farming"*. Although some respondents disagreed or were unsure,
325 one producer suggests that *"the technology and knowledge is available to make the development a
326 success, there will just need to be a period of transition and learning"*.

327 Figure 9 shows the responses by stakeholder and country group to the question (Question 14) *"Is
328 existing regulation in your country effective for regulating 'offshore' aquaculture?"*. The stakeholders
329 showed agreement in that only two from the 21 respondents (10%) thought that existing regulation
330 would be effective for managing 'offshore' aquaculture. In Scotland, nine out of the 11 (82%)
331 respondents thought that regulation was not appropriate or should be improved. Interestingly the
332 respondent from the Scottish environmental regulator gave a positive reply, though it is important to
333 note the same person thought Scottish aquaculture is unlikely to move 'offshore' in the next ten years
334 (Figure 5). Without appropriate regulation available, it will be very challenging for aquaculture to
335 expand into 'offshore' locations. This agrees with the outcomes from perception of research and
336 knowledge availability, shown in Figure 8, where more research was believed to be required for

337 effective 'offshore' regulation. It can be suggested from the results in Figure 9, that regulation could
338 be the key bottleneck which is hindering the move to 'offshore' environments.

339 **3.4. Additional comments from stakeholder feedback**

340 The respondents to the questionnaires were also given the opportunity to provide additional
341 comments. There were several comments on the ability of present environmental regulation to
342 manage the needs of more 'offshore' sites for sustainability, with some disagreement between
343 stakeholders. It was reiterated that environmental regulation required for 'offshore' locations is a
344 *"different ball game"* in comparison with inshore sites, and though it was accepted that 'offshore'
345 technology is *"advanced and that the design and engineering should not be considered as a significant*
346 *challenge"* regulation may prove to be a bottleneck

347 Many respondents identified that there is presently almost no regulation cover for 'offshore'
348 aquaculture, but that in Scotland *"the new [regulatory] framework can cope with the movement to*
349 *further offshore"* and replace the *"outdated"* system that does not serve the needs of the industry. It
350 is unclear whether this statement is referring to distance offshore and/or more dynamic open coast
351 environments, as the term "offshore" is not mentioned in the new regulations (SEPA, 2019). It was
352 pointed out that an *"increasing number of farms [away from the coast] are placed on hard and mixed*
353 *bottom habitats"* and that *"little is known about the impact of organic enrichment on long lived*
354 *epibenthos"*. There was a suggestion that regulation and licensing would therefore need to be
355 assessed over different temporal and spatial scales to those used presently. In addition, it was pointed
356 out that any new legislation had to be based on *"strong, fair, science-based regulation"* which supports
357 sustainability of the industry and provides confidence to consumers.

358

359 **4. Discussion**

360 'Offshore' aquaculture is often considered a way of increasing sustainable aquaculture production
361 (Gentry *et al.* 2016; Holm *et al.* 2017). However, from this study, it is clear there are several

362 fundamental issues that must be addressed for the salmon industry in Scotland and elsewhere. First
363 and foremost, is the need to establish clear and consistent definitions and terminology when referring
364 to 'offshore' systems. The literature review showed that most studies did not provide a clear definition
365 and, of the minority that did, distance to coast was the key consideration. The assumption of authors
366 may be that 'offshore' aquaculture as a concept is widely understood and (based on the definition of
367 'offshore' in the dictionaries), refers to distance from the coast. However, this is not the case amongst
368 stakeholders in the online questionnaires. The most used term to describe offshore conditions was
369 'wave exposure', though terms referring to distance and depth were also selected to a lesser degree,
370 suggesting there is no clear consensus on what 'offshore' means.

371 The majority of respondents in Scotland thought that existing regulation could be improved for
372 offshore salmon aquaculture. Lack of suitable regulation has been highlighted as a constraint to
373 'offshore' aquaculture development in other countries throughout the world (Davies et al., 2019;
374 Galparoso et al., 2021). Scotland's new regulatory framework for marine finfish aquaculture does not
375 refer to 'offshore' sites specifically, although a justification for revising the original framework was in
376 recognition that farms are moving away from the very sheltered locations where fish farming was first
377 established (SEPA, 2019). Instead, when discussing differences between sites, the regulatory
378 framework refers to how hydrodynamically dispersive a site is (SEPA, 2019). This is unsurprising since
379 finfish aquaculture in Scotland is primarily regulated based on dispersion of wastes. In this case,
380 suggestions by respondents to use terminology such as 'open-ocean' and 'high energy' may be more
381 useful than 'offshore'. However, since the term 'offshore' is frequently used by stakeholders, media
382 and researchers, even if it is not formally used in policies or regulation, it is important to explain this
383 and adopt clear terminology and avoid confusion. Consequently, as shown in this study, it may be
384 better to consult with a range of stakeholders and take location and/or species into account to relate
385 the terminology to production requirements and regulations. Given the present findings, broad terms
386 and generalisations such as 'offshore' are clearly insufficient and there may be a need for several
387 categories or terms to cover the range of conditions, regional and local factors.

388 Considering that Scottish salmon aquaculture regulation is focused on dispersion of wastes and
389 benthic impact, it is interesting that most of the respondents chose physical or hydrodynamic features
390 to define 'offshore' rather than substrate. In Scotland, most of the existing inshore sites are found in
391 areas of soft sediment, but as aquaculture expands into new locations, other substrate types may be
392 encountered, including hard bottom areas (Roberts et al., 2014), with epifauna being more common
393 than infauna. The seabed in many of these areas are also dominated by sandy sediments (Scottish
394 Government, 2016), which have different infaunal communities and environmental sensitivities than
395 those of the sedimentary inshore sites (Tyler-Walters, 2005), suggesting that there would be different
396 environmental effects from fish farm wastes. In Scotland's new regulatory framework, the need for
397 different biological standards for the different seabed habitats is recognised and it is acknowledged
398 that they are not available for all habitats at present. The Scottish Environment Protection Agency
399 (SEPA) will use visual surveys in the intermediate term, until scientific evidence is available to establish
400 appropriate biological standards (SEPA, 2019). In this present study, nearly half of the Scottish
401 respondents thought suitable techniques already exist to monitor impact. This could be related to
402 different interpretations of what 'offshore' is, or an opinion that development would not occur in hard
403 substrate areas, or there may also be a perception that monitoring approaches that are used or under
404 development in other locations would be suitable. In Canada and Norway, salmon aquaculture farms
405 are already located in areas with mixed and hard substrates. Some of the standard monitoring
406 requirements have been adapted (Hamoutene et al., 2016), but the need for new and improved
407 approaches for monitoring impact in such environments is acknowledged, particularly where it is
408 difficult or not possible to obtain grab samples, so research is underway to identify and develop new
409 methods and techniques (Hamoutene et al., 2015; Keeley et al., 2021).

410 Although the literature review showed an increasing number of studies, there were mixed opinions
411 amongst the stakeholders regarding the knowledge and research available on a number of key aspects
412 of 'offshore' salmon farming. More than half of the respondents thought that there is suitable
413 technology available for 'offshore' salmon aquaculture. This will be linked to their own perception of

414 what 'offshore' means, and it is not clear if they mean existing cage technology that is currently used
415 or the technology that is being developed and tested. Biophysical and environmental modelling can
416 play a key role and simulate interactions between the environment and aquaculture sites (Rabe et al.,
417 2020), or assess site suitability (Falconer et al., 2013). However, in situ trials at commercial scale are
418 still required for testing, validation, and confirmation, but there are so few examples of 'offshore'
419 salmon farming systems, that there only limited or initial results presently available (Hersoug et al.,
420 2021). As such, this may contribute to the stakeholders' broad and ambiguous range of views on
421 offshore aquaculture.

422 As this study shows, there are differences between stakeholders in perception of 'offshore', the
423 operational issues in the environment and the regulatory and data needs for exploitation of 'offshore'
424 aquaculture. This is particularly illustrated in the differences between the literature review and the
425 'Outside Scotland' stakeholders, both dominated by academic perceptions, and those of the most
426 diverse stakeholder group in Scotland. Though the sample site is acknowledged as small, the targeted
427 stakeholders' responses, along with the literature review, illustrate that there are still many questions
428 to answer before 'offshore' aquaculture can be fully implemented. The study shows there is interest
429 in understanding more about how 'offshore' salmon aquaculture can be developed and most
430 stakeholders thought that 'offshore' aquaculture will either have the same advantages or be better
431 than inshore production for selected criteria, particularly environmental sustainability, and public
432 perception. The results from the study can be used to show the issues to focus on and open a wider
433 discussion.

434

435 **5. Conclusion**

436 Regulatory bottlenecks are one of the main factors limiting expansion of 'offshore' aquaculture. If
437 environmental regulation is to be fit-for-purpose, then it must be relevant to the environmental
438 characteristics of the area and the production methods used. However, as shown here for salmon

439 aquaculture in Scotland, there are different perspectives over understanding what 'offshore' refers
440 to, which makes it difficult to characterise what 'offshore' conditions actually are. Clearly, 'offshore'
441 can mean different things in different contexts, for different countries and legislations. Therefore, it
442 should not be assumed that people know what 'offshore' is referring to. There may be a need to use
443 as range of definitions that offer more clarity about specific characteristics and it is recommended to
444 consult with relevant stakeholders to relate the terminology to production requirements and
445 regulations. Researchers should also clearly define what they mean if using 'offshore' within studies
446 to better facilitate knowledge exchange and open discussion about the opportunities and issues of
447 moving aquaculture 'offshore'.

448

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452 by the Tools for Assessment and Planning of Aquaculture Sustainability (TAPAS) project which has
453 received funding from the EU H2020 research and innovation programme under Grant Agreement No
454 678396.

455

456 **Ethics statement**

457 All questionnaires and data collected from stakeholders during this study conform to and have been
458 approved by the General University Ethics Panel of the University of Stirling. All stakeholder data has
459 been fully anonymised and informed consent received.

460

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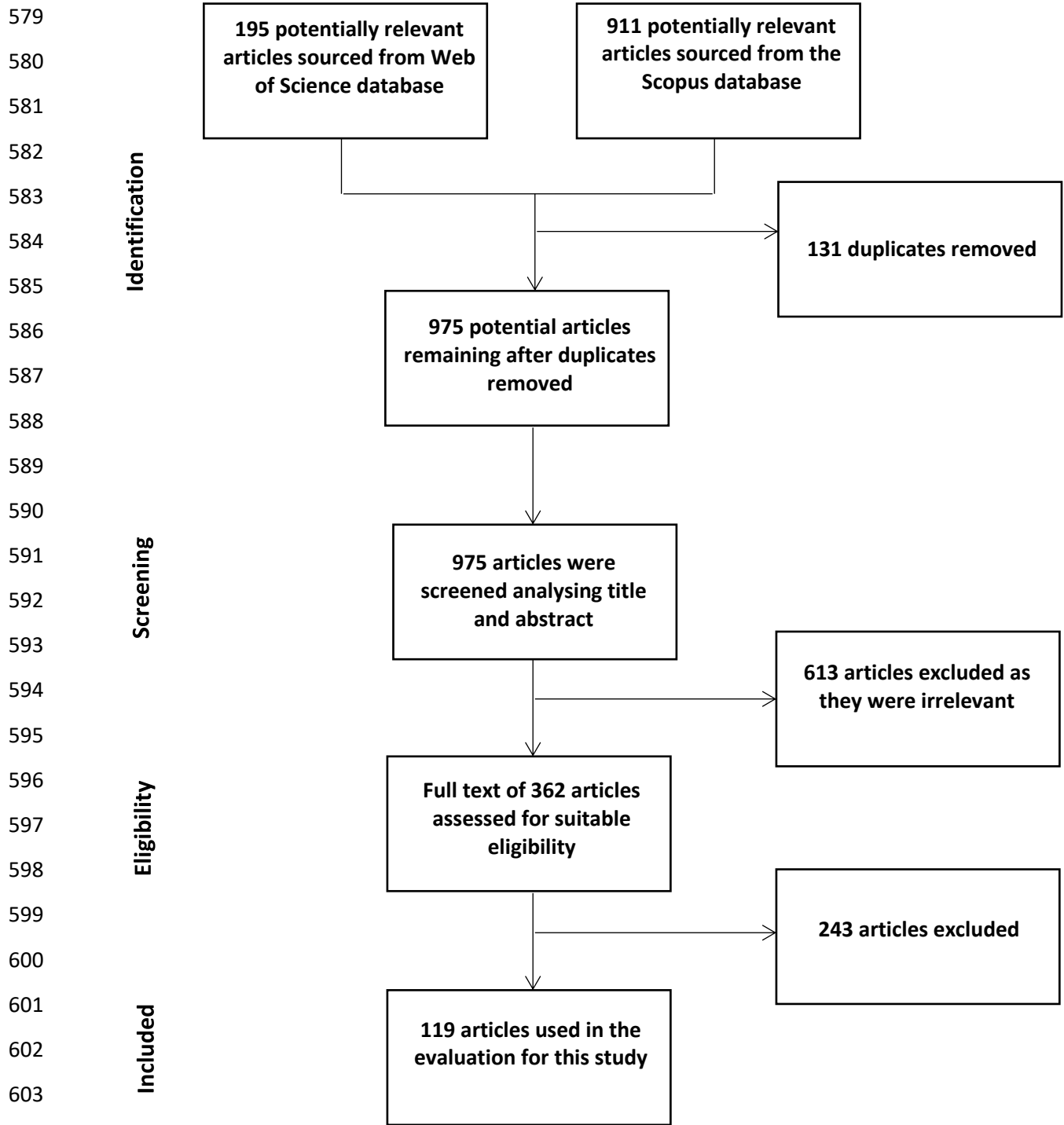
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606 *Figure 1: Overview of the literature search on offshore and aquaculture for more in-depth analysis*
 607 *using the guidance set by Preferred Reporting Items for Systematic Reviews and Meta-analysis*
 608 *(PRISMA).*

	Question	Potential Answers
Q1	What country is your company / organisation based in?	Scotland Norway Other
Q2	What best describes your organisation?	Feed company Producers NGO Regulator Academic Consultant Industry representative body Other
Q3	How long have you worked in the aquaculture sector?	Under 5 years 5-10 years 15-20 years 20 years or above
Q4	Do you think the existing regulatory system is effective and meets the needs of the salmon industry?	Strongly agree Agree Neutral Disagree Strongly disagree Additional comment box
Q5	Do you think the salmon industry in your country is operating sustainably at present?	Yes No Unsure Additional comment box
Q6	Do you think there is space for aquaculture to expand in the coastal environment?	Yes No Unsure Additional comment box
Q7	What are the greatest environmental issues that your organisation experiences with the salmon industry in inshore locations at present? (Rank in order of Importance; 1 = most, 8 = least)	Disease transfer Sea lice spread Escapees Discharge of organics waste Feed sustainability Pollution (e.g. eutrophication) Predators Visual impact
Q8	How would you define 'offshore aquaculture'?	Comment box
Q9	How likely do you think aquaculture will move to 'offshore' in the next 10 years?	Extremely likely Likely Neutral Unlikely Extremely likely Additional comment box
Q10	Do you think that 'offshore' aquaculture will offer any of the following advantages in comparison with inshore? (Much better, somewhat better, about the	Production (tonnes) Disease risk Health and welfare

	same, somewhat worse, much worse)	Environmental sustainability Public perception Climate change impact
Q11	Are there 'offshore' salmon farms in your country?	Yes No
Q12	Are there suitable techniques available for 'offshore' salmon farmers to measure and monitor impacts of salmon production in an 'offshore' environment in your country?	Yes No Unsure Additional comment box
Q13	In your opinion, do you think there is enough knowledge and research available to ensure the success of salmon aquaculture in these 'offshore' environments? (Strongly agree, agree, neutral, disagree, strongly disagree)	Technology Regulation/governance mechanisms Monitoring methods Environmental modelling Operational issues Site suitability Health and welfare knowledge Costs/finance
Q14	Is existing regulation in your country effective for regulating 'offshore' aquaculture?	Yes No Could be improved Additional comment box
Q15	Do you think moving aquaculture to 'offshore' could present challenges for your organisation?	Yes No Unsure Additional comment box
Q16	Is there anything else you would like to share that you think is relevant to this research?	Comment box

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616 *Table 2: Summary of thematic groups that covered the range of evaluated articles from the review*
617 *process*

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Thematic groups	Description	Number of articles
Technical feasibility	Studies which require engineering requirements	18
Biology	Studies highlighting the physical, chemical, physiological, and development processes	30
Environmental impact	Studies which highlight the consequences (positive and negative) of a development, and/or regulations and governance associated.	52
Other	Studies that did not fit into a specific thematic group	19
Total		119

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621 *Table 3: Summary of dictionary and definition for the term “offshore “*

Dictionary	Definitions for the term “offshore”
Collins Dictionary	From, away from, or at some distance from the shore
Oxford English Dictionary	In a direction away from the shore At some distance from the shore; at sea
Cambridge Dictionary	Away from or at a distance from the coast
Merriam-Webster	At a distance from the shore
Dictionary.com	Off or away from the shore At a distance from the shore
The Free Dictionary	Moving or directed away from the shore Located at a distance from the shore
Lexico	Situated at sea some distance from the shore
Google Dictionary	Situated at sea some distance from the shore

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625 *Table 4: Summary of research participants and background in the industry*

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Country	Background	Years of experience in industry
Scotland	Rental Equipment Provider (Tech)	5-10 years
Scotland	Technical Supplier (Tech)	21 years or above
Scotland	Equipment Manufacturer (Tech)	11-15 years
Scotland	Feed Company	16-20 years
Scotland	Regulator	5-10 years
Scotland	Consultant	11-15 years
Scotland	Industry Rep. Body (Other)	Under 5 years
Scotland	Academic	5-10 years
Scotland	Producer	5-10 years
Scotland	Non-depart. Public Body (Other)	21 years or above
Scotland	Producer	Under 5 years
Canada (Outside Scotland)	Academic	16-20 years
USA (Outside Scotland)	NGO	11-15 years
Norway (Outside Scotland)	Academic	5-10 years
Norway (Outside Scotland)	Regulator	11-15 years
Chile (Outside Scotland)	Producer	5-10 years
China (Outside Scotland)	Academic	21 years or above
China (Outside Scotland)	Academic	5-10 years
China (Outside Scotland)	Academic	16-20 years
China (Outside Scotland)	Academic	11-15 years
China (Outside Scotland)	NGO	5-10 years

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630 *Table 5: Ranking of environmental issues in order of importance in response to the online questionnaire*
631 *question: what do you think the greatest environmental issues are with the salmon industry in inshore*
632 *locations at present?*

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Environmental Issues	Issues in rank order of importance*	Relative weighting of respondents (%)
Sea lice spread	1	60
Disease transfer	2	45
Discharge of organic waste	3	35
Feed sustainability	4	35
Escapees	5	30
Predators	6	30
Visual impacts	7	25

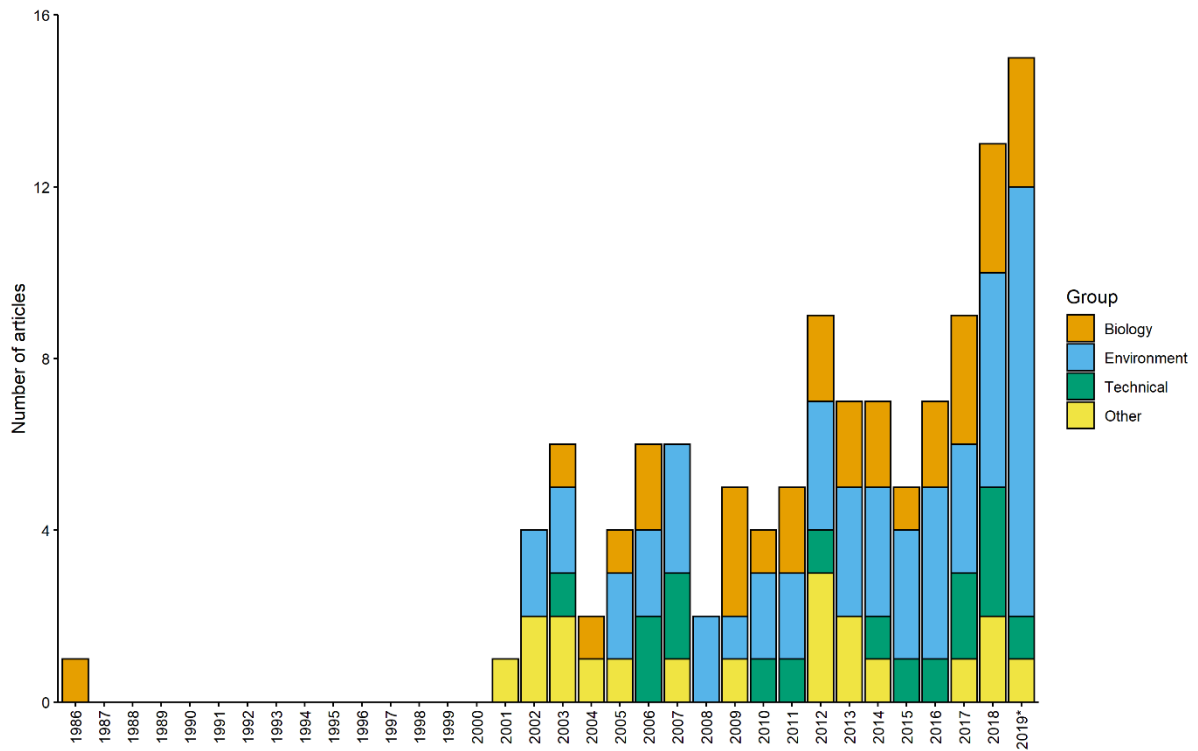
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635 * (1 = most important, 7 = least important)

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641 *Figure 2: The number of articles published each year in the thematic groups; Technical feasibility,*
642 *Biology, Environmental impact and Other. * = up to July 2019.*

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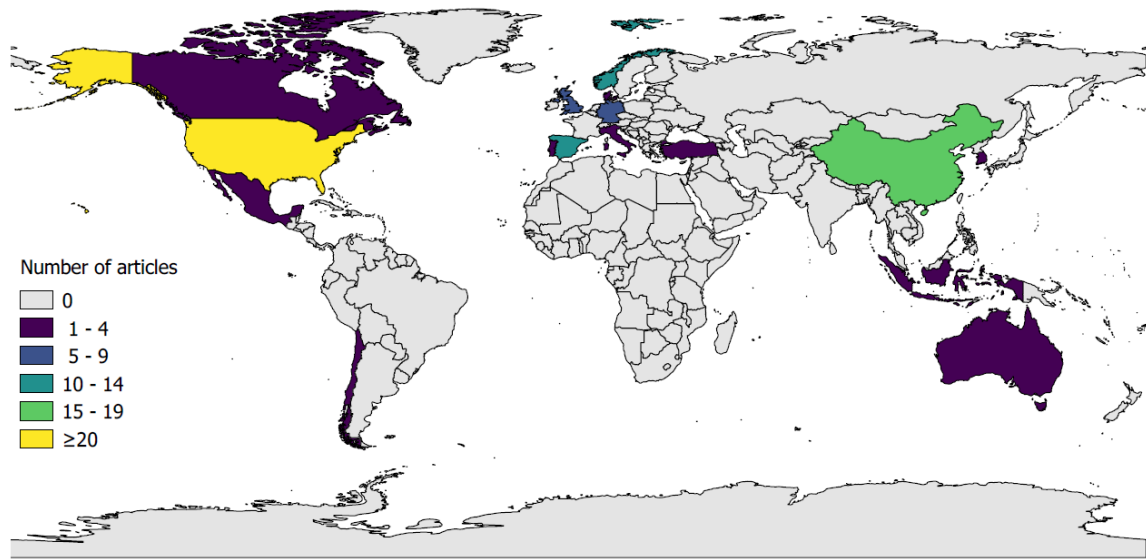
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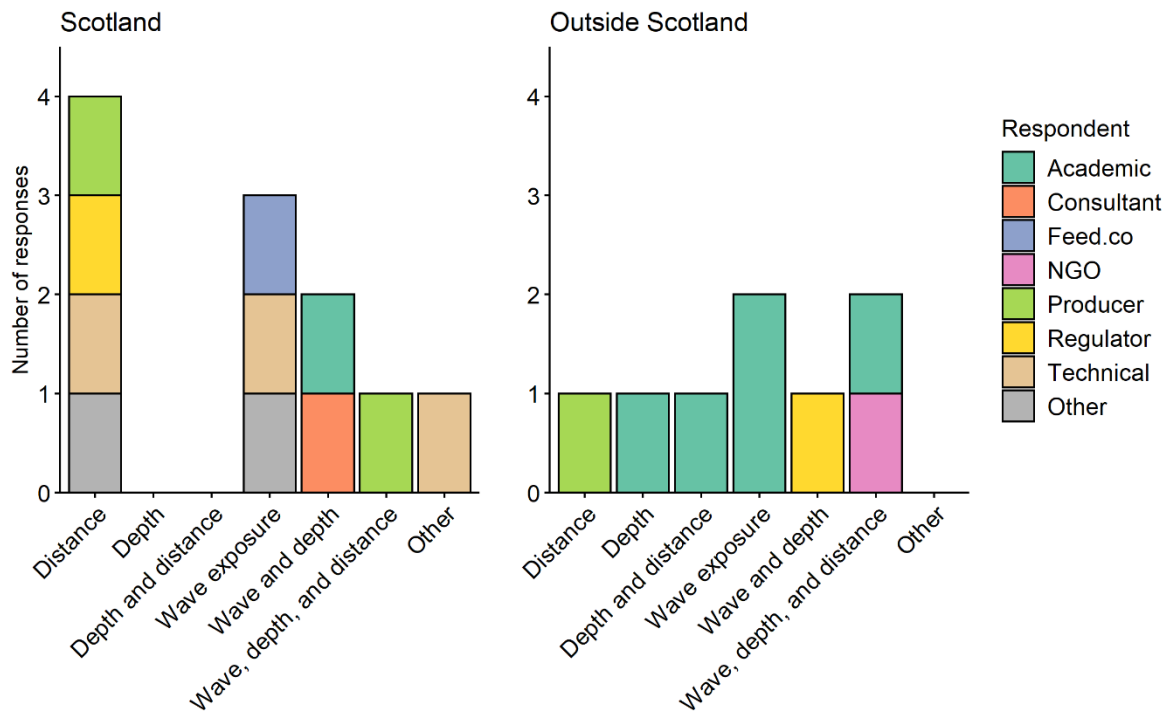
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651 *Figure 3: Countries where studies on 'offshore' aquaculture are taking place (N = 16). The colours refer*
652 *to the numbers of publication articles relating to these countries found during the literature review.*

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657 *Figure 4: A stacked bar chart displaying the number of responses (country and stakeholder level) to the*
658 *question: How would you define 'offshore' aquaculture?*

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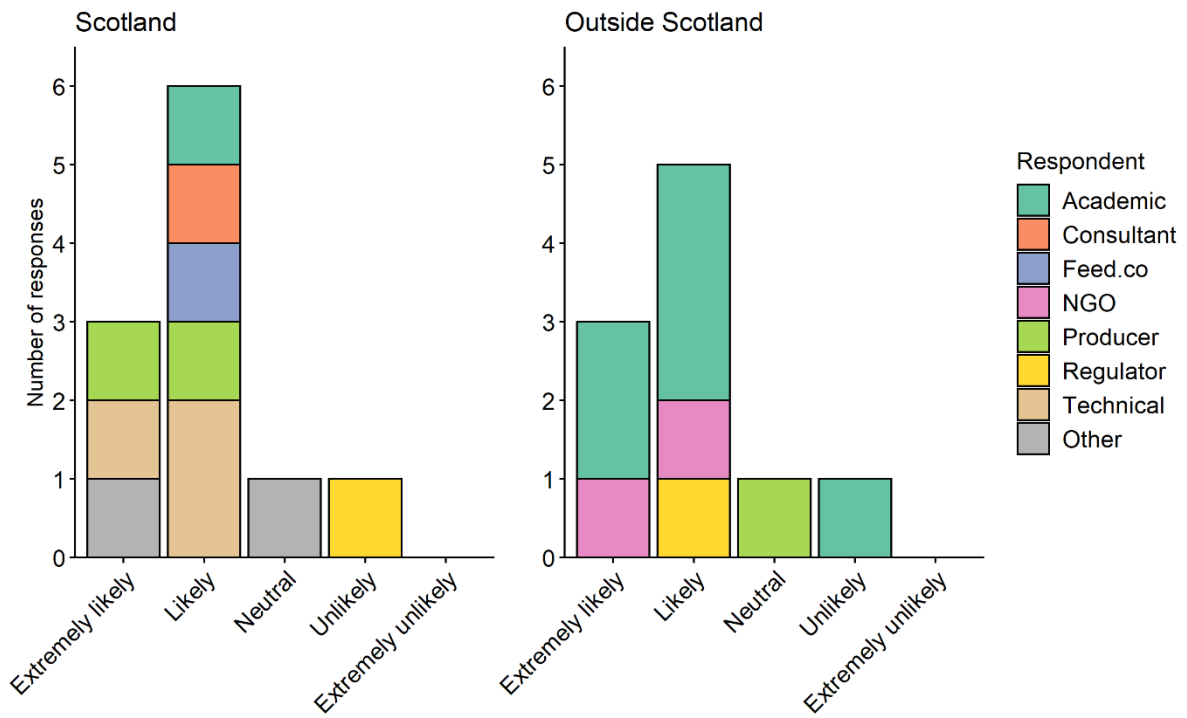
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666 *Figure 5: A stacked bar chart displaying the number of responses (country and stakeholder level) to the*
667 *question: How likely do you think aquaculture will move to offshore in the next 10 years?*

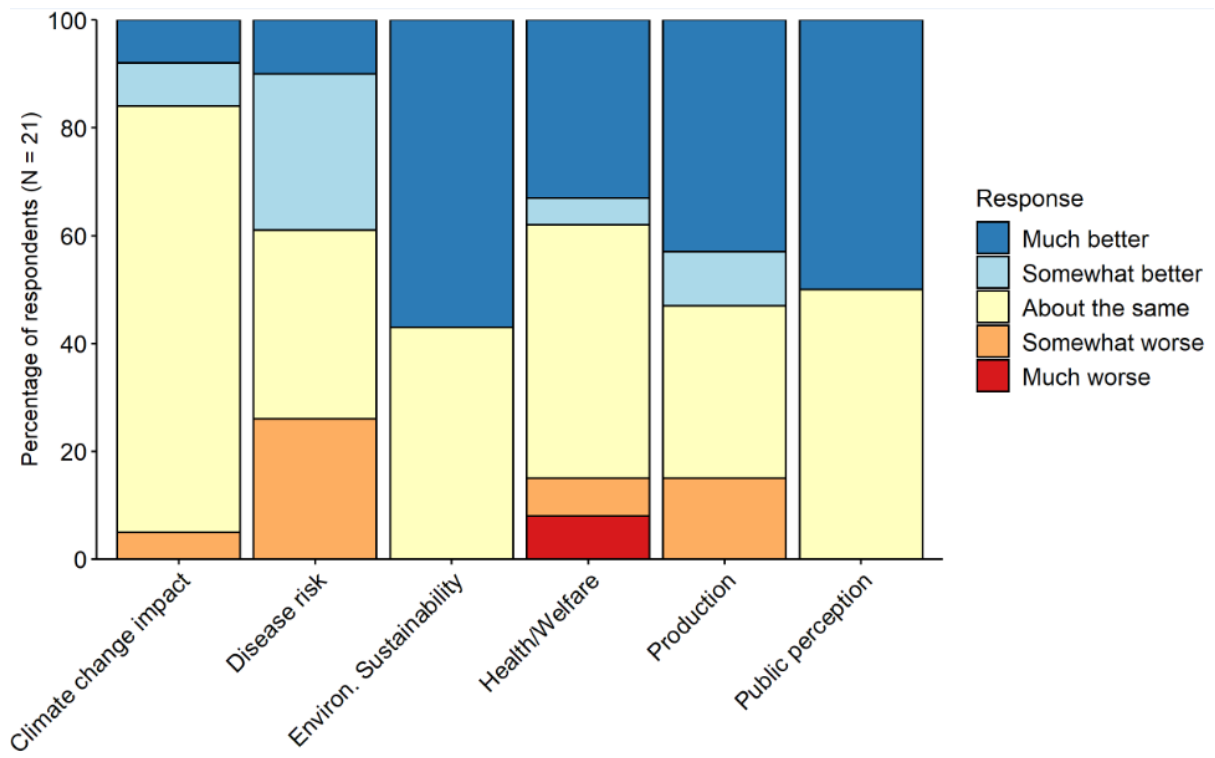
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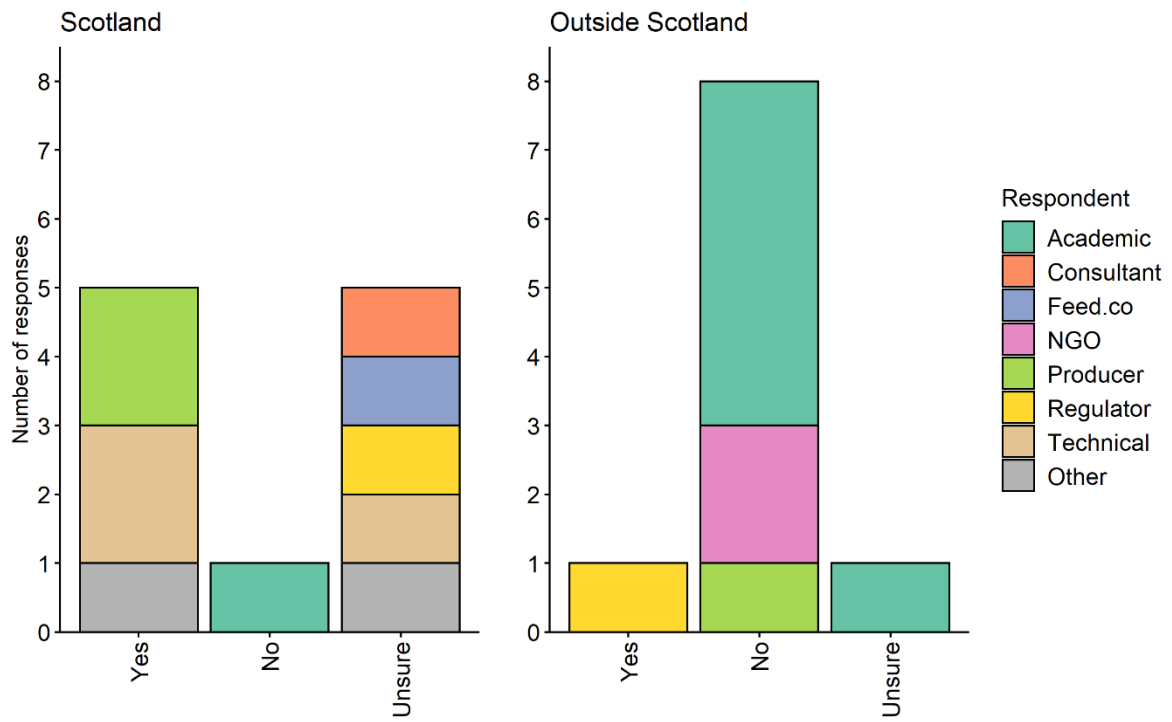
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675 *Figure 6: A 100% stacked bar chart displaying the percentage response to the question: Do you think*
676 *that offshore aquaculture will offer any of the following advantages in comparison with inshore? N =*
677 *21*

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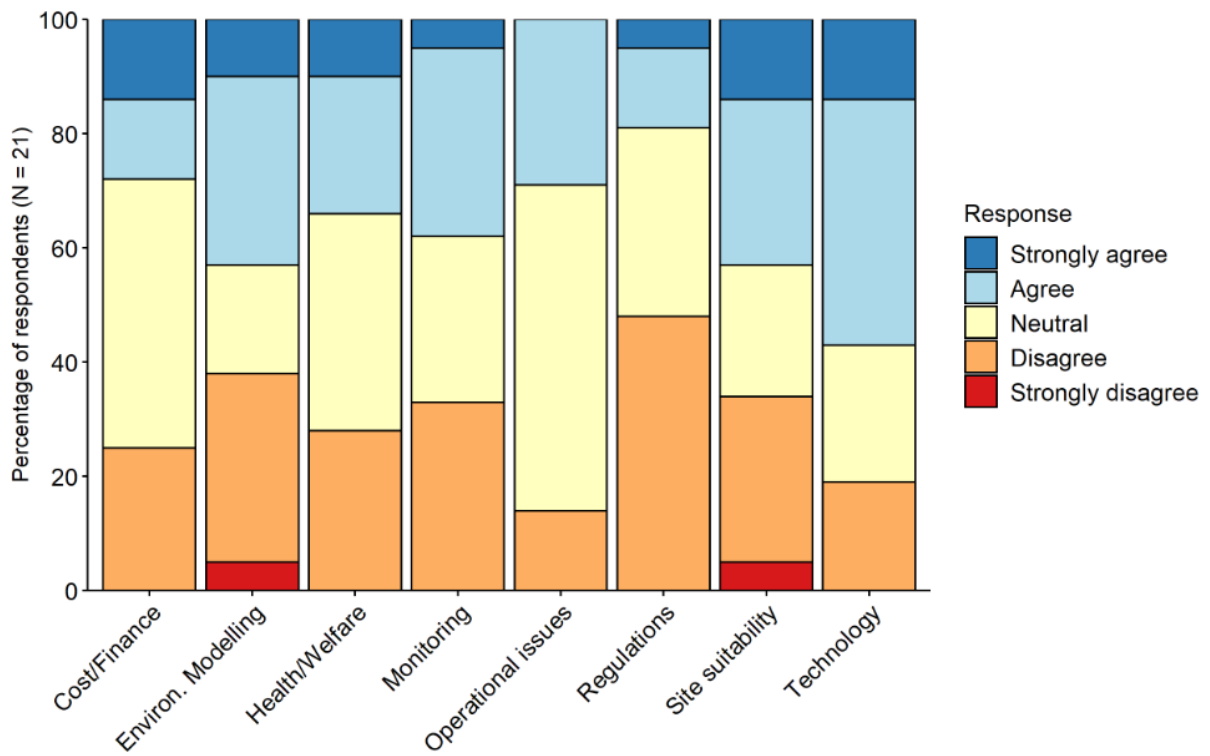
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683 *Figure 7: A stacked bar chart displaying the number of responses (country and stakeholder level) to the*
684 *question: Are there suitable techniques available for offshore salmon farmers to measure and monitor*
685 *impacts of salmon production in an offshore environment in your country?*

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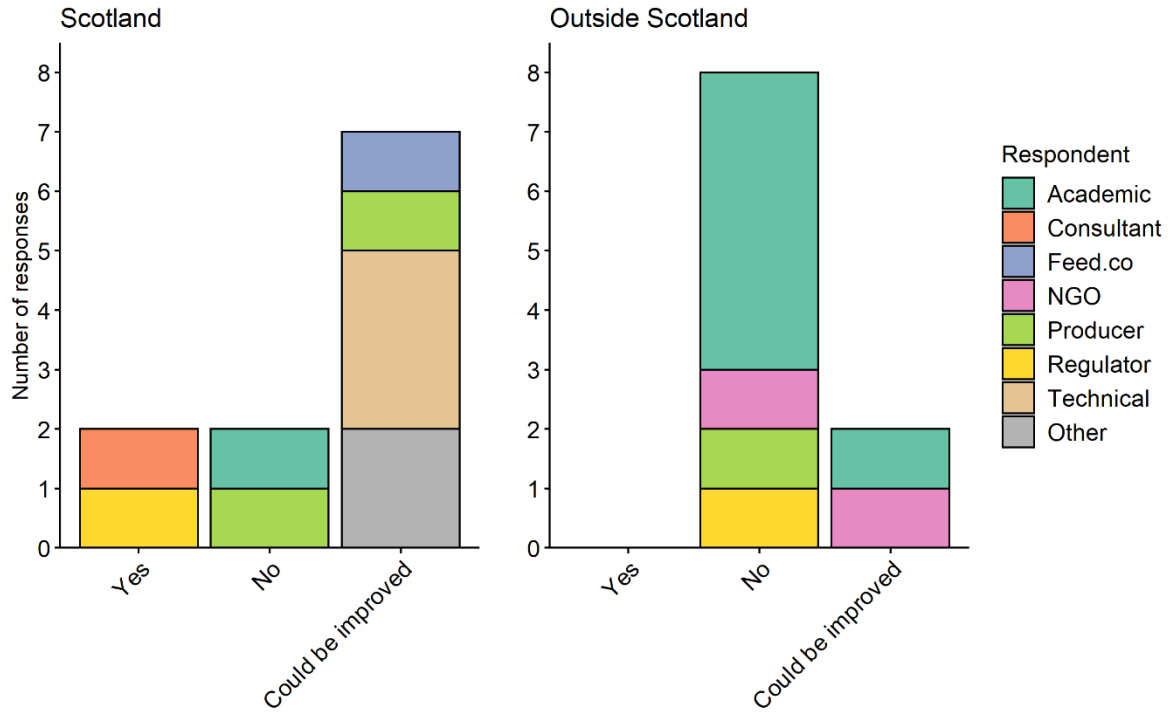
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691 *Figure 8: A 100% stacked bar chart displaying the percentage of response to the question: Do you think*
692 *there is enough knowledge and research available to ensure the success of salmon aquaculture in these*
693 *offshore environments? N = 21*

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697 *Figure 9: A stacked bar chart displaying the response (country and stakeholder level) to the question:*
 698 *Is existing regulation in your country effective for regulating offshore aquaculture?*

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