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14/09/2017



**Scottish  
Wildlife  
Trust**

### **Application 17/03660/FUL: Site 3130M NE of The Tattie House Isle Of Rum**

The Scottish Wildlife Trust welcomes the opportunity to respond to the Highland Councils consultation on the proposed salmon farm located off the coast of the Isle of Rum. The Trust would like to see Scotland become a world leader in sustainable aquaculture, but to achieve this the Trust believes that the growth of the industry must not be to the detriment of Scotland's environment.

The Trust supports sustainable finfish aquaculture and will campaign for effective regulation, monitoring, enforcement and research to achieve a Scottish fish farming industry sold on the basis of high quality and unrivalled environmental credentials. In order to be sustainable, the Scottish fish farming industry must maintain the quality, health and biodiversity of the waters it occupies and avoid significant, cumulative, long-term or irreversible damage to the environment.

The Trust believes a key component of a sustainable aquaculture industry is appropriate location. With this in mind, the Trust would like to register its **objection** to this fish farm application.

The site of the proposed farm lies within and in the vicinity of a number of protected areas, most notably an SPA designated for protecting manx shearwaters (amongst others birds) and the Small Isles nature conservation MPA, an area that has been identified as important for a number of features that includes:

- burrowed mud,
- circalittoral sand and mud communities,
- the UK's only known aggregation of fan mussels,
- northern sea fan and sponge communities, and
- northern feather star aggregations on mixed substrata

Salmon farming poses a threat to the health of all of these benthic features, primarily through the release of waste from the farm (i.e. faecal matter and uneaten foods that contain chemical therapeutants). The proposed farm lies over an area of burrowed mud and the release of faeces and uneaten food can lead to nutrient enrichment of the surrounding seafloor, which can alter the community composition of organisms living within this habitat.

The proposal to use the chemical therapeutant Emamectin benzoate (also known as Slice) to treat sea lice is of particular concern to the Trust. Slice has been found to impact the health of non-target species, in particular crustaceans. The high abundance of *Nephrops norvegicus* (an important commercial species) within the vicinity of the proposed fish farm, as identified by the applicant's benthic survey (1.22 nephrops per m<sup>2</sup>, pg. 120 of Environmental Statement), suggests the use of Slice would have a direct impact on the health of local populations of Nephrops.

**Patron** HRH The Prince Charles, Duke of Rothesay **Chairman** Robin Harper **Chief Executive** Jonny Hughes

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Although Nephrops are not a protected species, they are a crucial component of burrowed mud ecosystems and a decline in Nephrops numbers would have an indirect impact on the health of these protected habitats. Recent research has also shown that chemical therapeutants can be toxic at low concentrations and that unacceptable impacts resulting from their use can reach far beyond the range of the Allowable Zone of Effect.<sup>1</sup> The Trust considers the proposed use of Slice for controlling sea lice unacceptable, especially for a fish farm located within an MPA.

The Trust is concerned the presence of a salmon farm, and more specifically the risk of increased numbers of sea lice, at the proposed location will have a detrimental impact on the wild salmonid populations within the surrounding area (specifically Atlantic Salmon and Sea Trout, both of which are Priority Marine Features in Scotland). The applicants Environmental Statement acknowledges the presence of juvenile sea trout in the nearby rivers, which suggests an uncontrolled or unmitigated increase in sea lice abundance could be detrimental.

The Trust recognises that the applicant's surveys detected sea lice on the wild sea trout, but we are concerned about the unnaturally high numbers of sea lice that the fish farm will host on farmed salmon and the increased numbers of sea lice larvae in the surrounding waters. Sea lice are a widespread problem throughout Scotland's salmon farming industry, a problem which the industry has yet been able to control. The suggested controls for sea lice within this application (i.e. Slice and cleaner fish) are no different to those currently being applied by other farm operators, suggesting that the operators of the proposed farm will also fail to control a sea lice infestation.

The applicant has made reference to the use of cleaner fish (e.g. wrasse) as a method of controlling sea lice, and that the industry is developing hatcheries to meet the need for cleaner fish. The Trust is concerned that the fish farm operators will use wild caught wrasse as well as wrasse from hatcheries and would like clarification over what percentage of cleaner fish from hatcheries will be used and, preferably, confirmation that the operators will not use wild caught cleaner fish.

The Trust recognises that for the Scottish salmon farming industry to increase its production, the number of salmon farms will also need to increase. However, the Trust believes that, through appropriate location, sustainable growth can occur without unnecessarily threatening the health of the marine environment. The proposed fish farm lies within a number of protected areas and directly threatens many protected features. Approval of this site would undermine the national and international legislation that protect these areas and set a dangerous precedent for future fish farm applications. There are many sites off the west coast of Scotland that provide suitable conditions for salmon farming without posing a risk to protected species and habitats. These sites should be prioritised over those that lie within MPAs.

Please could you keep me informed of how this application progresses.

Yours faithfully,

Samuel Collin

Marine Planning Officer

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<sup>1</sup> SARF098: Towards Understanding of the Environmental Impact of a Sea Lice Medicine – the PAMP Suite, 2016. A study commissioned by the Scottish Aquaculture Research Forum (SARF).

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