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**Scottish
Wildlife
Trust**

22/10/2020

Scottish Wildlife Trust response to application CAR/L/1188421

Scottish Sea Farm salmon farm off Horse Island

The Scottish Wildlife Trust welcomes the opportunity to submit a response to the Controlled Activities Regulations (CAR) Licence application by Scottish Sea Farms for a 12-cage marine fish farm off the east coast of Horse Island, Summer Isles.

The Trust is [willing to support](#) 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. However, in order to be sustainable, the quality, health and biodiversity of the water salmon farms occupy must be maintained, avoiding significant, cumulative, long-term or irreversible damage to the environment and marine life.

With this in mind, the Trust considers the site of Scottish Sea Farm's proposal is not suitable for a salmon farm and is concerned that it poses unnecessary risk to protected features within the Wester Ross Nature Conservation Marine Protected Area (MPA), some of which could be permanently damaged.

Scottish Wildlife Trust activity around the Wester Ross MPA

The Trust is currently involved in a number of activities, partnership projects and operations in the North West of Scotland that take place within or next to the Wester Ross MPA. These include:

- The management of **Ben Mor Coigaich**, the Trust's largest wildlife reserve, which sits on the coast of the Scottish mainland opposite Horse Island,
- The Trust-led **Coigach & Assynt Living Landscape** is a community partnership project that aims to bring environmental, social and economic benefits to the Coigach and Assynt regions of North West Scotland; and
- The community engagement component of our **Living Seas** project, based in Ullapool, aims to raise public awareness and interest in the value of a healthy marine environment and the importance of the Wester Ross MPA to local communities. This work also includes the establishment of the Ullapool Marine Festival and our innovative and award-winning [snorkel trails](#). The Ardmair site within the North West Highlands snorkel trail lies within the MPA.

Previously, the Trust worked collectively with other members of Scottish Environment LINK towards the establishment of Scotland's Nature Conservation MPA network, and then towards the

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design of the Marine Conservation Orders for the Wester Ross MPA to ensure the designated features of the MPA were protected.

Protected features of the Wester Ross MPA

The Wester Ross MPA was designated in 2015, along with 29 other MPAs, for the purpose of 'conserving marine flora and fauna', 'in particular conserving any species that is rare or threatened because of –

- the limited number of individuals of that species,
- the limited number of locations in which that species is present.¹

With respect to the Wester Ross MPA, the conservation objectives are to 'recover' maerl beds and 'conserve' the other protected features within the MPA.²

The protected features within the MPA are:

- burrowed mud
- circalittoral muddy sand communities
- flame shell beds
- kelp and seaweed communities on sublittoral sediment
- maerl beds
- maerl or coarse shell gravel with burrowing sea cucumbers
- northern feather star aggregations on mixed substrata

All of these features are benthic habitats and are, therefore, at risk from increased sedimentation and smothering (particularly for maerl beds³). The waste material released from an open-cage salmon farm would, therefore, pose a direct risk to these features.

In Scotland, maerl beds are found along the west coast, Hebrides and Northern Isles. Scotland hosts approximately 30% of the maerl beds in north-west Europe.⁴ They are protected features within 11 of Scotland's MPAs. Records of maerl can be found throughout the Wester Ross MPA (see Marine Scotland's National Marine Plan interactive), and the Trust was actively involved in collecting supporting data on the distribution of maerl within the MPA.

The proposed site at Horse Island is adjacent to known records of maerl (as recorded on Marine Scotland's National Marine Plan Interactive), and the applicants benthic survey of the site identified maerl beds and maerl or coarse shell gravel with burrowing sea cucumbers present within the survey transects.

The benthic survey also identified the following features:

- burrowed mud
- northern feather star aggregations, and
- kelp and seaweed communities on sublittoral sediment.

It is evident that the site of the proposed salmon farm is in the vicinity of protected features and would present a direct risk to maerl, for which the MPA has a 'recover' objective, and three other

¹ Marine (Scotland) Act 2010 – Part 5, 68 (5)

² Wester Ross NCMPA - <https://www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/marine-protected-areas/nature-conservation-mpas/wester-ross-ncmpa-designation>

³ Hall-Spencer, J. et al. (2006) Impacts of fish farms on maerl beds in strongly tidal areas. Marine Ecology Progress Series. 326: 1-9

⁴ Marine Scotland information – Maerl beds. <http://marine.gov.scot/information/maerl-beds>

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protected features, which have a 'conserve' objective. Indeed, there is a 'target management area' for maerl identified adjacent to the proposed site⁵, which this development has the potential to directly impact.

The chemicals proposed to be used by Scottish Sea Farms are also of concern as they pose a risk to marine species. Of particular concern is the in-feed sea lice treatment, Slice (emamectin benzoate). Slice has been found to cause substantial (60-90%) mortality of wild crustaceans, which includes commercially important species such as crabs, lobsters and nephrops^{6,7}. Within Scottish Sea Farms' benthic survey for the site, squat lobsters and burrow sites, thought to belong to nephrops, were identified. The site is also known to be regularly fished by local creelers. The use of Slice has the potential to cause damage to the surrounding ecosystem and could also have an economic impact on the local creel industry.

The features designated for protection support the wider community of marine species and provide important nursery grounds for some commercially important species (for example, maerl beds are important nurseries for scallops). Damage to these habitats could, therefore, have wider impacts on the marine ecosystem and local commercial fisheries.

Blue carbon habitats

In addition to their ecological and economic importance, many of these features are recognised as 'blue carbon' habitats, known for their potential to capture and store carbon. For example, maerl beds provide a long-term standing stock of carbon that, in some areas of Scotland, date back 11,000 years.⁸ Records of maerl bed presence is improving, but data on the distribution around Scotland's coastal waters is still limited. Although maerl beds can be long-lived, the coralline algae that form them are incredibly slow growing and any damage done (e.g. siting of aquaculture above maerl⁹) will take decades to recover from.

Existing management measures within the MPA

It is important to recognise that the [Marine Conservation Order](#) for the Wester Ross MPA, which places management measures for commercial fishing activity within the MPA, prohibits demersal trawls and dredging at the same site of the salmon farm proposal. It would seem perverse to prohibit one activity in order to protect the MPA features, yet allow another that directly affects the same features.

Parliamentary inquiries into salmon farming

In 2018, the Environment Climate Change and Land Reform (ECCLR) Committee and the Rural Economy and Connectivity (REC) Committee carried out two inquiries into salmon farming in Scotland.

⁵ Scottish Natural Heritage Commissioned Report No. 764: Upper Loch Fyne and Loch Goil pMPA and Wester Ross pMPA - the identification of conservation management areas to support protected feature recovery

⁶ SARF Report: Towards understanding of the Environmental Impact of a Sea Lice Medicine - <http://www.sarf.org.uk/cms-assets/documents/251503-644637.sarf098---whole-document-aug2016.pdf>

⁷ Burrige, L., Weis J., Cabello F., Pizarro, J. and Bostick, K. (2010) Chemical use in salmon aquaculture: A review of current practices and possible environmental effects. *Aquaculture*. 306 (1-4): 7-23.

⁸ Burrows, M.T. et al. 2014. Assessment of carbon budgets and potential blue carbon stores in Scotland's coastal and marine environment. Scottish Natural Heritage Commissioned Report No. 761.

⁹ Barbera, C. et al. (2003) Conservation and management of northeast Atlantic and Mediterranean maerl beds. *Aquatic Conservation: Marine and Freshwater Ecosystems*. 13: S65-S76

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The conclusions of the ECCLR Committee's report included the following points (for clarity, the text in bold is contained in the original ECCLR Report):

- *There need to be changes to current farming practice. The industry needs to demonstrate it can effectively manage and mitigate its impacts.*
- *Further development and expansion must be on the basis of a precautionary approach and must be based on resolving the environmental problems. **The status quo is not an option.***

The REC Committee's report provided a set of recommendations for the future growth of the industry. These include:

- **RECOMMENDATION 29**

The Committee believes that it is essential that the issue of waste collection and removal is given a high priority by the industry, the Scottish Government and relevant agencies. It is clearly one of the main impacts on the environment and needs to be addressed as a matter of urgency.

- **RECOMMENDATION 48**

The Scottish Government should provide strong and clear leadership in ensuring that the precautionary principle is applied, producing appropriate policy and guidance documents as necessary. These should make clear that the potential impact on the environment, known wild salmon migratory routes and other species must be comprehensively and robustly assessed and fully taken into account as part of the consideration of salmon farm applications.

- **RECOMMENDATION 51**

It is therefore of the view that the Scottish Government should, as a matter of priority, initiate a spatial planning exercise with a view to developing strategic guidance specifying those areas across Scotland that are suitable or unsuitable for siting of salmon farms. This work should take full account of existing strategic documents such as the Marine Plan, and incorporate an assessment of the potential impact of salmon farms on Marine Protected Areas (MPAs) and Priority Marine Feature (PMFs) and the species which inhabit them.

Scottish Sea Farms' proposal for a salmon farm off Horse Island indicates that the findings from the ECCLR inquiry and the recommendations from the REC inquiry have not been considered, particularly with regard to waste management and impacts on MPAs and PMFs. The continued pursuit of a CAR licence for a poorly located site within an MPA, which their own benthic surveys identify contains PMFs, indicates a disregard for the conservation objectives of the MPA.

The Trust considers that Scottish Sea Farms' proposal is an example of the type of proposal the ECCLR and REC Committees were aiming to discourage – i.e. the use of traditional, open-cage designs within an MPA, which pose a direct threat to protected features. The proposed activity does not align with the conservation objectives of the Wester Ross MPA and with advancements made in semi-closed and offshore sites, this proposal represents a move in the wrong direction for the salmon farming industry.

Recommendation 51 of the RECC report highlights the need for strategic spatial guidance and an assessment of the potential impacts of salmon farms on MPAs, but these have not yet been produced. In their absence, and to achieve the objective of Recommendation 48 – provide strong and clear leadership in ensuring that the precautionary principle is applied – the Scottish

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Government (and SEPA) must provide clearer guidance on salmon farm proposals that have the potential to directly impact protected features.

The first objective in SEPA's Aquaculture Sector Plan is to 'ensure all business in the sector reach and maintain full compliance with Scotland's environment protection laws...', which must surely apply to new proposals within MPAs.

General concern over salmon farm applications in MPAs

While this letter is in response to a specific application, the Trust is increasingly concerned over the continuation of proposals for open-cage salmon farms within Scotland's MPA network, in particular within MPAs that have designated features at risk from salmon farming.

The MPA network was established to 'meet national objectives and help deliver an ecologically coherent MPA network in the North East Atlantic, contributing to the protection and enhancement of [Scotland's marine area]¹⁰, yet there are salmon farms already operating within the MPA network and applications for more. In order to conserve and improve the health of Scotland's marine environment, it is imperative that new farm proposals within MPAs are discouraged.

The Trust considers it vital that SEPA and the Scottish Government advance the spatial strategic guidance and assessment of potential impacts salmon farming has on MPAs and PMFs, as recommended by the REC Committee, and clarify their position on new and existing salmon farms in MPAs.

The Trust has concerns that the approval of Scottish Sea Farms proposal off Horse Island could set a dangerous precedent for future salmon farm applications within MPAs, where the presence of a protected feature is not enough to deter the applicant, nor prevent approval for the development.

I look forward to your response.

Yours faithfully,

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¹⁰ Marine Scotland's National Marine Plan

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