

Cameron, Zara

From: Jon Gibb <jongibb123@gmail.com>
Sent: 15 November 2022 17:32
To: centralvalidationteam
Cc: roger.brook; Alan Kettle-white; Charlotte Middleton; Alan Wells; robert.younger
Subject: 22/02263/SCOPE

Categories: Zara

Dear Sir/Madam,

**Scoping Request for the proposed development of a semi-closed containment
salmon farm and supporting shore base
SITE ADDRESS: North Of Lurignish Farm Appin Argyll And Bute PA38 4BN**

The Lochaber District Salmon Fishery Board welcomes the opportunity to feed in to the Scoping exercise for this proposed fish farm.

Firstly, please note that you have the incorrect postal address for this DSFB and it is listed correctly at the bottom of this email.

The Lochaber DSFB generally supports the use of newer technologies in the production of salmon in the West Highlands, particularly those that offer protection from wild salmonid populations from the known threats of sea lice infestation and genetic pollution from escaped farm fish breeding in the wild. In this respect the semi closed containment system appears to come under this general heading.

The information given says that the system is successfully used in Norway. In order to assess the actual risk of this proposal we would need to see far more information on that. For instance, are these systems used successfully in Norway for the full grow-out period and is there a record of accidents at these facilities resulting in any escapes of fish or examples of where the fish have needed to be treated for sea lice?

The application recognises that human error is often the cause of breaches to the security systems in all fish farm systems. We have to assume that this will be the case in this system as well. For instance there have been any examples of operator error in net maintenance in open net systems, or indeed breaches by predators or storm damage, resulting in escapes of farmed fish - is there anything to suppose that something similar could not happen with the membrane system being proposed? More information on this is required, with the use of examples from existing operations.

It is also critical when assessing the actual risk of any potential escapes or sea lice impacts to know what the potential range of influence is. The applicant has used a figure of 15km and drawn a circle round the farm site. We would argue that this is rudimentary at best and would query what methodology and evidence is being used for that assumption. The proposed location lies in the middle of a long south-west facing and thin fjord-like sea loch (Loch Linnhe). With this topography and alignment sea lice can move very significant distances and accumulate in 'hot spots' due to concentration and the prevailing wind etc. It is not simply a case of thinking the zone of influence will be 15kms in diameter. We would argue that the zone of influence of this farm should there be any problems will be the whole of Loch Linnhe all the way up to Fort William where, for example, the River Lochy (one of the largest and most important salmon rivers on the West Coast) and several other key salmonid rivers are located, let alone the rivers already mentioned in the application. A far more detailed assessment of zone of risk is required.

The semi closed containment system is viewed as being a sustainable way of farming fish. This is only true if the whole grow out period happens in the contained system. It would appear that the applicant may wish

to use this system for only half of the full growout period (Model 2) - thereafter moving the fish to a traditional open net system. If that is the case then this proposal does not address the environmental concerns that this Board has about local salmon farming in inshore waters, it simply adds another way farmers have of growing fish that will eventually be farmed in unsustainable open net pens. If that was the case then it is difficult to see how this Board as the statutory body for the protection of migratory salmonids could support the application as it will actually add nothing positive to the protection of wild fish overall, and arguably add even greater risk through unsustainable inshore expansion.

So perhaps the applicant could provide evidence of where this technology is being used in other parts of the world for the full growout of salmon in its marine phase? Or indeed perhaps the applicant could remove the option of moving the fish to open net system in the late growout phase - this would certainly add considerably to the sustainability credentials being asserted.

yours faithfully

--

Jon Gibb, Clerk to the Board
Tel 07786 493048

Clerk to the Board, Lochaber DSFB
Camisky Steading
Torlundy
Fort William
PH33 6SP

<http://lochaber.dsfb.org.uk/>