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11th March 2021

Dear Sir/Madam

REF: 20/02358/MFF

I am writing to object strongly to the Dunstaffnage Scottish Sea Farms Extension biomass and cages based on the following:

1) JOBS

Automated farm, no extra direct jobs.

2) CHEMICALS & VETERINARY MEDICATION

Wild swimmers are at risk, alongside entire ecosystems from chemical/faecal pollution.

Important rare seagrass beds found near Ganavan will be adversely affected. F.O.I. SEPA data suggest Emamectin Benzoate is already in use at this farm, despite the manager's claim that they use no chemicals.

Flame retardants are impregnated in generic smolt feed to prevent spontaneous combustion en route from Chile.

Antibiotics regularly administered.

More fish = more chemicals/antibiotics used.

Studies show our West Coast Orcas cannot reproduce due to toxic overload evidential during necropsy of Lulu. Why add further chemicals into the sea?

<https://www.nms.ac.uk/explore-our-collections/stories/natural-world/lulu-the-killer-whale/>

3) MARINE HAZARD

More hazardous for marine traffic (we were on a yacht, rescued by RNLI, prop fouled by a stray anchor rope from this farm). Our friends' yacht was a write-off. This happened in the channel, well outside the farm marker buoys and between the Ganavan headland and the farm buoys.

4) INCOMPATIBILITY with tourism and eco-tourism industries. There is one farm to every 10 miles of coastline on the West Coast, all using chemicals, incinerating mortalities and discharging untreated waste into our seas. We now have to tolerate well-boats, chemical container boats, hydrolicers and thermolicers dominating the seascape and anchorages. At what point did we all agree to this industrialisation of our beautiful coastline? Our seas are not a sewer and now more than ever we have to address the real challenge of repairing the damage that has already been done. The harvesting schedule provided in the supporting documents for this site if the expansion is allowed to go ahead, will turn this area into industrial arena, at odds with locals' quiet enjoyment of the beautiful surroundings..

5) **FAECES** Untreated waste emissions (faeces) plus feedwaste/organophosphates going directly into our seas and near Ganavan. According to the National Trust for Scotland, the raw sewage equivalent to one town of 10,000-20,000 population, from each farm.

6) **DIVIDING COMMUNITIES.** In these difficult times, where we are facing global ecological collapse, fish farms are dividing communities by prioritising a few jobs. Salmon welfare issues are being repeatedly exposed through filming and recent F.O.I. requests. It is really sad that any (mostly young lads) have to work in this dark industry, whose profits go overseas into Norwegian bank accounts.

7) **SEA LICE** infestation is so bad on most farms especially where the biomass/cage numbers has been increased, incurring the need for industrial Hydrolizer/Thermolizer boats . This expanding of biomass statistically increases the necessity for more incinerations on the barges, potentially leading to increased air pollution. We have witnessed the black discharge from these incinerators.

8) **DISTURBANCE BY Acoustic Deterrent Devices (ADDs) AND INDUSTRIAL NOISE.** This petition explains the ADD's problem <http://chng.it/bgpfgGV7QZ> 'How can the high decibel resonance from ADD's be good for the salmon, seals or cetaceans?'

9) **'PREDATOR CONTROL'** New licencing laws have seen an increase in the cruel business of seals being indiscriminately shot. <https://donstaniford.typepad.com/my-blog/2021/02/daily-mirror-nearly-80-seals-were-legally-shot-in-scotland-in-2020-highest-number-in-seven-years.html>

Apparently, during Covid lockdown last year, Marine Scotland waived the rules for reporting the shootings and rarely are the carcasses photographed or retrieved as they should be. This is extremely lax. Dead seals have washed up at North Shian regularly in the past.

10) **SUSTAINABILITY** Fish farming is not sustainable. Ben Hadfield of Mowi for instance has freely admitted that fish farming cannot even now equate the 1 kg of wild fish derived from world fish stocks to produce 1 kg of farmed fish. It is somewhere in the region above 2:1. Biodiversity elsewhere in the world is suffering from this plundering. Expanding this fish farm would only compound the problem.

11) **PROFITS** go overseas to Norwegian companies.. Communities are torn apart as the gulf between those who understand the damage fish farming is doing to our seas is tentatively ransomed over providing one or two local jobs. Any money going into the community is used as a sweetener and softener to outweigh the "inconveniences" of the farm as and when they arise, making it difficult to justify valid complaints. F.O.I. figures for 2017 show that of the £1.61 profit per kilo, only £0.01 goes to environmental protection (SEPA) and £0.005 goes to charitable works. Economically, the business therefore is

profiteered by the few, whilst simultaneously destroying our unique and sensitive environment.

12) **AQUACULTURE LITTER** This is prolific as ever increasing number of storms continue to batter our shores. Cleaning up the aquaculture litter on remote beaches is a huge challenge. The unseen aspects of such consistent littering such as toxins and microplastics I have described below in 14).

13) **ESCAPES** A very real risk of an increased number of 'salmon escapees' if expansion happens, crossbreeding with wild salmon and accelerating their demise.

14) **MICROPLASTICS** from cages by photo-degradation (sunlight) and mechanical action caused by wind and waves. Also by feed-pipe abrasion released or deposited in the faeces. We have micro-plastics in plankton. Toxic chemicals are known to adhere to micro-plastics in our seas. Increased cage size will mean increased micro-plastics into the sea.

<https://www.sciencedirect.com/science/article/pii/S0269749118333190>

<https://www.fishfarmingexpert.com/article/feed-pipe-wear-putting-tonnes-of-plastic-into-sea>

15) **CLEANER FISH** and the usage of pretend black plastic kelp. They suffer themselves from an overburden of lice in the cages and they are then discarded at the end of the production cycle, if not sooner. The wrasse and sucker fish are pillaged from Cornwall/Devon, depleting those natural resources and transported here. Extending Dunstaffnage biomass and cages would further aggravate this challenging UK-wide problem.

16) **MORTALITIES** The mortality rate last year was brutal on the larger SSF farm at Loch Creran (14 cages), due to pathological gill disease and sea lice. Recently, allegedly, the survival rate on the nearby Lismore East farm was only 63%. Increasing the cage size and biomass at Dunstaffnage would only encourage statistically more mortalities due to increased prevalence of disease.

<https://theferret.scot/farmed-salmon-deaths-disease-reach-record-high/>

17) Skye and Arran communities have rallied together to protect their coastline from industrial farming and we should be able to do the same.

... and finally I would like to show my concern at the supporting documents from persons who are already on the industry payroll. Surely the planning portal should not be a voice for those already employed in the industry or related industries to further their stakes?

Kind regards

Maggie Brotherston