

**WESTER ROSS AREA SALMON FISHERIES BOARD**

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Mr James Bromham  
Planning and Development Services  
Highland Council  
Glenurquhart Road  
Inverness  
IV3 5NX

Dear Mr Bromham,

**Application for alteration of existing fish farm to 46 square steel pens at Loch Kanaird,  
eastern side of Isle of Martin – Reference 13/01494/FUL**

After careful consideration of the above application and undertaking a review of the best available wild fisheries data for this area, we consider that this proposed development will continue to cause an adverse impact effect on the Kaniard River and the wider area in general. We wish to register an objection to the above application submitted to the Highland Council by Wester Ross Fisheries Limited.

The Wester Ross Area Salmon Fisheries Board (WRASFB) has a statutory duty under s.45 of the Salmon and Freshwater Fisheries (Consolidation) (Scotland) Act 2003 for the protection and improvement of fisheries within their district. As such, the WRASFB would like to present our reasoning behind this current objection and support the Highland Council in the decision making process in managing the interactions between aquaculture and wild fisheries interests within this coastal area.

**1. Interactions between Aquaculture and Wild Fisheries**

An analysis completed in 2004 demonstrated that freshwater angling in Scotland results in the Scottish economy producing over £100 million worth of annual output, which in turn supports around 2,800 jobs and generates approximately £50million in wages and self-employment into Scottish households, most of which is within rural areas<sup>1</sup>. The wild fisheries sector that is dependent on ecologically healthy coastal and rivers zones has experienced an absolute decline since the introduction of aquaculture into the west coast starting in the 1970s<sup>2</sup>.

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<sup>1</sup> Radford, A., Riddington, G. and Anderson, J. 2004. Research Report; The Economic Impact of game and Coarse Angling in Scotland. Scottish Executive Environment and Rural Affairs Departement.

<sup>2</sup> RAFTS, 2011. Comparison of the decline of Scottish East and West Coast Salmon Fisheries. Available online <http://www.rafts.org.uk/wp-content/uploads/2011/10/East-v-West-final-RWB.pdf>

It is important to note that there is a current presumption against aquaculture development on the east coast of Scotland. A comprehensive analysis of official rod catch statistics was undertaken by the Rivers and Fisheries Trusts of Scotland<sup>3</sup> (RAFTS) in which they compared the West coast rod catches with East coast rod catches during the time that aquaculture became established on only the west coast. This analysis clearly demonstrates that the rod catch on the west coast of Scotland has declined significantly compared with catches on the east coast.

This application for the change in configuration, re location and expansion of the pen group area in Loch Kanaird is located within 1.5km of the mouth of the River Kanaird and is within approximately 25km of the salmon and sea trout river mouths of the Ullapool, Broom, Dundonnell, Little Gruinard and Gruinard along with many smaller river systems. The Little Gruinard is currently designated as a Special Area of Conservation with the species “Atlantic salmon” as the qualifying feature. In the first assessment cycle on the conservation status of Atlantic Salmon in SACs, it was confirmed that the Little Gruinard was in an unfavourable but recovering state.

### **1.1 Managing Interactions Aquaculture Project**

The WRASFB wishes to draw attention to the forth-coming publication of the Managing Interaction Aquaculture Project 3 Report: Locational Guidance and Zones of Sensitivity analysis, (MIAP). The Rivers and Fisheries Trusts of Scotland (RAFTS) on behalf of a number of project partners with wild fisheries interests undertook a study to produce spatial models and guidance on the interactions of aquaculture and wild fisheries on the west coast of Scotland<sup>4</sup>.

This work has been presented to the WRASFB on a number of occasions, most recently on the 30th of April 2013. The preliminary findings of this work, as presented to WRASFB, are indicative that the Loch Kanaird area would fall within a high sensitivity classification for the rivers and fisheries within this area. Furthermore, the Coastal and Transitional Prioritisation model which considers the potential risk of sea lice and water-borne diseases arising from aquaculture developments to each of the defined water bodies, is indicative that this loch system is also a highly sensitivity area. These two high sensitivity classifications from a wild fisheries perspective would be considered as areas that ideally, aquaculture should not be present and relocation should be a consideration for any active farms within these areas.

It is imperative that the models, briefly discussed above, are presented appropriately and WRASFB wishes to express that these models are solely a risk assessment to identify areas of sensitivity from a wild fisheries perspective and they do not determine the impact of a

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<sup>3</sup> *Ibid*, RAFTS, 2011.

<sup>4</sup> <http://www.rafts.org.uk/aquaculture/> This work is currently being finalised and the project report will be available shortly, Please contact Callum Sinclair Director of RAFTS for further details on this project.

development on wild fish populations. The responsibility of determining impact lies with the WRASFB and Highland Council.

## **2. Specific Comments relating to the applicants Supporting Information for this Planning Application.**

As identified in the ASFB/RAFTS guidance on the aquaculture planning process<sup>5</sup>, information regarding the management strategies such as sea lice management and data on the existing farm is critical for the assessment of any likely impact the proposed development will have on the wild fish populations.

We are disappointed to see that the consideration within this application for the interactions with the wild fisheries in relation to sea lice is rather dismissive. There is now increasing evidence that sea lice emanating from aquaculture sites have been a significant causative factor in the decline of west coast salmonid populations<sup>6</sup>. Also, once fish farms become infected with pathogens, they can magnify infection pressure in the local environment<sup>7</sup>. The highest detrimental impact of sea lice is demonstrated nearest to the farm site however it can reach a potential range of up to 31km<sup>8</sup>. Finally as Robbins *et al* (2010)<sup>9</sup> demonstrated, good sea lice management can effectively lower release rates of the planktonic sea lice phase.

Wild fisheries monitoring information for this area suggests that the wild salmonid populations are carrying some of the highest detrimental sea lice loadings seen across all of the monitoring sites on the west coast. The monitoring work for this area is carried out by the Wester Ross Fisheries Trust (WRFT) to assess the health of sea trout and record the sea lice levels. There is a monitoring site in Loch Kanaird which is one of twenty four sites across the west coast that is monitored and reported on in the Managing Interactions Aquaculture Project 1: Strategic programme of post-smolt sweep netting and analysis<sup>10</sup>. As reported in 2011 the detrimental lice loadings found on these sea trout post-smolts, was recorded at

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<sup>5</sup>ASFB and RAFTS June 2012. Advice to Boards/Trust on engaging with the planning process for finfish aquaculture. <http://www.asfb.org.uk/wp-content/uploads/2011/04/Advice-on-Aquaculture-Planning-Process.pdf>

<sup>6</sup> *Ibid*, RAFTS 2011

<sup>7</sup> Murray AG 2009. Using simple models to review the application and implications of different approaches used to simulate transmission of pathogens among aquatic animals. *Prev Vet Med* 88: 167-177.

<sup>8</sup> Middlemas S.J, Fryer R.J., Tulett D. and Armstrong J.D 2013. Relationship between sea lice levels on sea trout and fish farm activity in western Scotland. *Fisheries Management and Ecology*, Volume 20, Issue 1, pages 68–74.

<sup>9</sup> Robbins, C., Gettinby, G., Lees, F., Baillie, M., Wallace and Revie, C. W., 2010. Assessing topical treatment interventions on Scottish salmon farms using a sea lice (*Lepeophtheirus salmonis*) population model. *Aquaculture*, 306 pp191-197.

<sup>10</sup> RAFTS 2012. Managing Interactions Aquaculture Project 1: Strategic programme of post smolt sweep netting and analysis <http://www.rafts.org.uk/wp-content/uploads/2013/01/RAFTS-Regional-Monitoring-Report-2012.pdf>

33% and in 2012 this number rose to 48%<sup>11</sup>. As identified within this report a level of 10% or greater on a wild fish population should be considered a cause for concern.

To be able to ascertain the likely impact the farm in this application may be having on the current sea lice situation we required information on the status of the current sea lice management and levels for the farm. The only publicly available information on the current status of the sea lice management and levels for all fish farms across Scotland is provided in an aggregated manner from the Scottish Salmon Producers Association (SSPO). The results of which to date are extremely concerning.

From December 2010 up to December 2012, sea lice management was reported on for six regional areas and data provided through the SSPO regarding the North Mainland, which covers the Kaniard area, reported a peak during June 2012 that *“lice numbers across the North Mainland region, on average, were 458% above the suggested lice treatment threshold set out in the NTS and CoGP (i.e. 0.5 adult female lice per fish)”*. This recorded peak during the critical wild smolt migration period is very concerning. In May 2013, the SSPO refined this reporting strategy and now presents information on thirty areas. The Kaniard site under consideration in this application falls within area code 27 known as the Kennart to Gruinard area. It is reported that over the months of January to March 2013, the adult female lice counts were over the threshold levels as defined in the Code of Good Practice. In addition to this, area 27 is consistently recording the highest adult female lice counts throughout the reporting period of all thirty areas<sup>12</sup>. It should be noted that only WRF Ltd with 5 sites and Scottish Sea farms (SSF) with 3 sites, operate in area 27 which is also known as the Two Brooms.

As the data presented in these reports is in an aggregated format, it was felt appropriate to obtain a more site-specific picture of the actual management and sea lice counts for the farm in this application. Information on the historical sea lice counts and effectiveness of sea lice control for this site was requested from WRF Ltd. This request was met with a refusal and they implied that the WRASFB is not a *“competent statutory consultee”*<sup>13</sup>. Clearly the position undertaken by WRF Ltd is in conflict with our statutory responsibility and without the requested information we could not fully assess any potential impacts between the farm application and wild salmonids. As such WRASFB has had no option but to use data previously released through Freedom of Information requests, to assess the likely impact this development may have on the wild fisheries of the Kaniard River. Unequivocally the data supplied and reviewed by WRASFB demonstrates that the WRF Ltd sea lice management practices, as applied, are failing to effectively manage sea lice as they

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<sup>11</sup> *Ibid*, RAFTS 2012.

<sup>12</sup> Scottish Salmon Producers Association, Fish Health Management, P36: Summary. May 2013.

<sup>13</sup> Email from WRF Ltd to WRASFB dated 30th May 2013.

consistently breach the thresholds as set out in the Code of Good Practice<sup>14</sup>. This data coupled with the wild fish monitoring data and the publically available data, demonstrates that area 27 and the WRF Ltd Loch Kaniard site in particular, appear to be currently one of the most problematic sites for sea lice management on the West of Scotland.

It is clear that the wild fisheries within area 27 are being affected by sea lice and that the WRF Ltd Kanaird site is potentially a significant source and magnification of sea lice which are being released into the receiving waters of Loch Kaniard. By refusing to supply the specific sea lice data for this site as evidence, WRF Ltd cannot demonstrate that the identified sea lice problem within Loch Kaniard is being effectively managed. Any potential plans for increasing the onsite biomass in the future would escalate the problem catastrophically for the River Kaniard. We would urge WRF Ltd to engage with WRASFB and supply the requested sea lice data so we can fully assess this aspect in more depth.

### **3. General Application Comments**

#### **3.1 Policy**

The Highland Council policy guidance for the marine area in Loch Kanaird is contained in the Coastal Plan for the Two Brooms Area, published in 2006<sup>15</sup>. The plan expresses a number of points of which the following policy statements are important in regards to this application:

*“The Coastal plan supports the responsible development of aquaculture on sites and at a scale which is compatible with other interests.”<sup>16</sup>*

*“The Coastal plan encourages measures to relocate existing finfish farms away from inner sea loch areas and the mouths of rivers, where possible to more seaward locations”<sup>17</sup>*

WRASFB support the clear guidance in the Policy Plan that recognizes balancing any aquaculture development with all relevant interests within the area and as it stands, this application simply does not meet these policy statements or the ethos as set out in the guidance which would support and safeguard the restoration and recovery of the wild salmonid stocks in the River Kanaird.

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<sup>14</sup> Please see Appendix 3 for further details of the information assessed from the FOI requests.

<sup>15</sup> Interreg 3B,Coastatlantic, Atlantic Coast (Wester Ross) Project

<sup>16</sup> Coastal Plan For the Two Brooms Area, page 18 (Aquaculture policies), 5.1.7 (1)

<sup>17</sup> Coastal Plan For The Two brooms Area, page 18 (Aquaculture policies), 5.1.7 (3)

## Conclusions

In light of the information presented in the application and the data available for this area relating to the wild fisheries, WRASFB believes the following conclusions can be drawn:

- The area for the proposed location should be considered as fragile and highly sensitive from a wild fisheries perspective.
- The supporting evidence provided within the WRF Ltd application has failed to demonstrate that the proposed configuration change and expansion of the pen group area, would not adversely affect this fragile and sensitive area.
- The evidence presented by WRASFB suggests that the proposed development would continue to suppress the recovery of the wild fisheries of the River Kaniard.
- WRASFB in line with the Highland Council policy is supportive of responsible development and the removal of fish farms from river mouths. This application opposes both these principles.
- Finally this fish farm has not undergone the Scottish Government Review Process. Permanent planning permission should not be granted to this application without that process being successfully completed.

Whilst WRASFB are strongly against this application as it stands, if in the future WRF Ltd are considering any such development or expansions we would encourage them to actively open dialogue and discuss matters with us before a planning application is submitted. Had such discussion between WRF Ltd and WRASFB taken place in this instance, a number of aspects that are discussed above could have been addressed and incorporated within the application. At the forefront of these is the requirement for a revised area specific action plan on the control of sea lice as all available evidence suggests there is a significant problem within this development area and WRF Ltd have not been able to provide evidence or demonstrate, that this is not the case.

It would seem logical that any appropriate mitigation measures required to safeguard wild fisheries would also be beneficial if applied as conditions to responsible planning consents. These would include,

- Engagement with the WRASFB to include regular sea lice monitoring and a real time information exchange for the farm site. All data supplied should be made publicly available to ensure accountability and transparency.
- Synchronised lice treatments of all farms within the area.

- The introduction of lower threshold levels of sea lice than is currently suggested in the Code of Good Practice. Including zero female ovigerous sea lice, during the critical wild smolt migration period (Feb - June).
- Synchronised fallowing of all farms within the area.
- No movement of live fish between management zones unless they are below the lice treatment threshold set out in the NTS and CoGP.
- Should a consent be granted, there should be legally binding measures incorporated as conditions, to reduce on-farm biomass and/or to review the planning consent after installation, if evidence continues to show that the farm site is failing to meet the mitigation measures.

In conclusion, on review of the information presented within the WRF Ltd application and the points discussed above, WRASFB believes that in order to ensure we are complying with our statutory obligations to protect and improve the fisheries within our district we must object to this fish farm application as it currently stands and would advise the Highland Council to reject this application.

If you require any further information or clarification of the any points raised above please do not hesitate to contact me.

Yours sincerely,

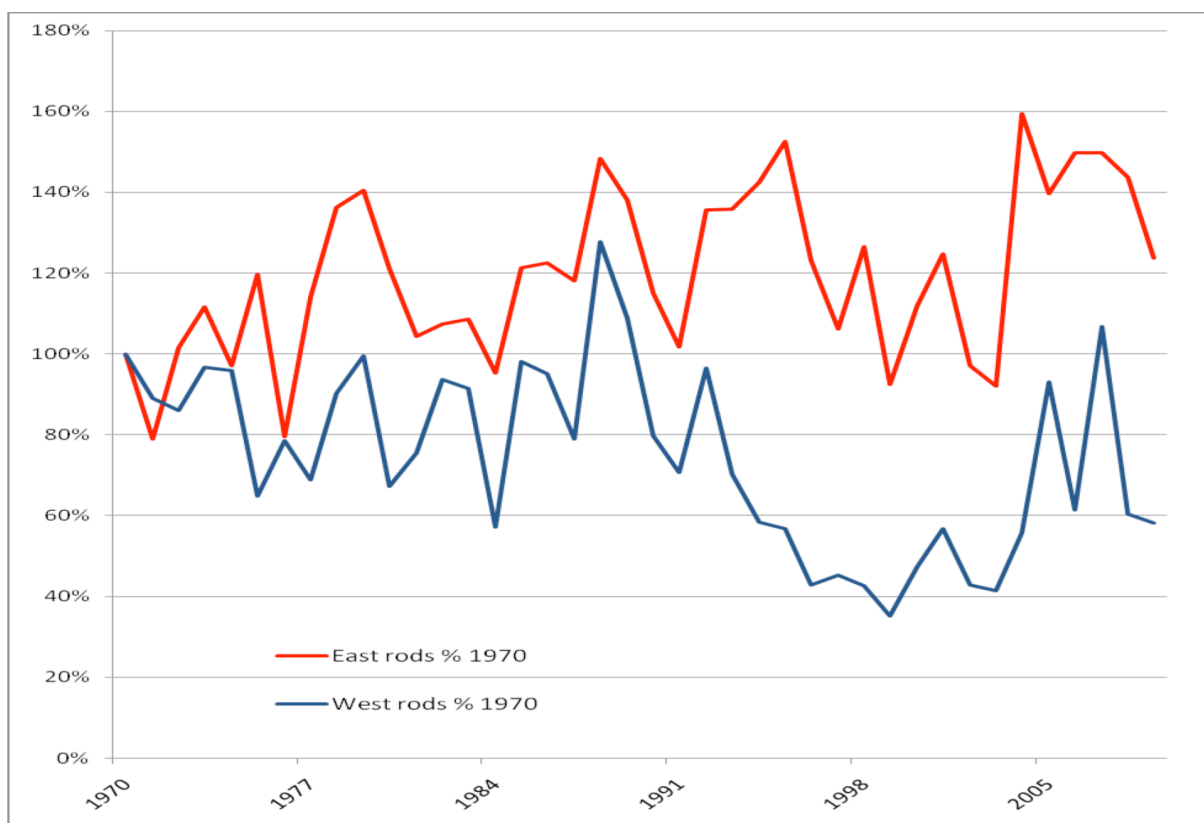


Mr Bill Whyte  
Chairman

## Appendix

### Appendix 1:

Table 1: Decline in Scottish wild salmon catches by rod (1970 = 100%) north and west coast (Cape Wrath to Ardnamurchan) compared to east coast as datum. Data taken from the Marine Scotland annual catch Statistics.





## Appendix 2:

Table 2: Raw data from SSPO Regional Health reports for N. Mainland. (0.5 adult female lice per fish from February until June, and 1.0 adult female lice per fish from July until January).

| Report Period | N. Mainland  |
|---------------|--|
| Dec-Feb '11   | Below/9%   |
| Mar-May '11   | 32%  |
| Jun-Aug '11   | 138%/149%  |
| Sep-Nov '11   | 284%   |
| Dec-Feb '12   | Data not checked during this time period and no longer available from the industry |
| Mar-May '12   | 152%   |
| Jun-Aug '12   | 458%/233%  |
| Sep – Dec '12 | 263%   |

## Appendix 3:

The Fish Health Inspectorate (FHI) inspected the Wester Ross Fisheries' Ardmair / Loch Kaniard farm on 10th November 2009 and recorded that, adult female sea lice counts were above the suggested threshold in the Code of Good Practice (CoGP). A subsequent inspection of Ardmair, on 15th June 2011, also recorded that sea lice levels were above CoGP thresholds, with the site manager reporting that Alphamax treatments were not as effective as in the past. A further inspection on 2nd August 2011 recorded that before an Alphamax treatment on 28th July, adult female lice levels were at 8.4 per fish, reducing to 6.7 the day after the treatment, but still way over the CoGP thresholds. During 2011, the farm had also treated with SLICE in May and July, which does not therefore appear to have been effective in controlling lice levels. In 2012, lice levels were again over the CoGP. An inspection in April 2013 at this site by the WRFT biologist indicates that again the lice levels are above the CoGP targets. It is therefore evident that sea lice levels on farmed salmon at the Ardmair site have breached CoGP levels consistently over a number of years and the current sea lice treatment strategies show no signs of effectively managing the problem.