

**Wester Ross Area Salmon Fishery Board
The Harbour Centre
Gairloch
Wester Ross
IV21 2BQ**

Planning and Development Department
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

~~09 August 2017~~

17 April 2018

Dear Sir/Madam

Site 2130m East Of Sconser Quarry, Sconser. ~~17/02707/FUL~~ 18/00993/FUL

This response has been prepared primarily with regard to the potential threat to wild salmon and sea-trout fisheries on the Scottish mainland, to the east of the Inner Sound, including those areas within the southern part of the Wester Ross Area Salmon Fishery Board (WRASFB) area.

After considering the existing published information relating to biomass and the management of existing fish farms in the area, the on-farm control of sea lice within the area as reported by SSPO, sea lice monitoring data held by S&WRFT and rod catches of wild salmon as reported by Marine Scotland, we conclude that the proposed Sconser fish farm has the potential to present further significant adverse impact within an area where there have been sea lice control issues.

The WRASFB, therefore, objects to this proposed fish farm application.

The nearest salmon river within the WRASFB area is the Applecross river which is approximately 20km from the site of the proposed Sconser fish farm. There are also several salmon rivers on the Isle of Skye, notably the Sligachan and Broadford rivers, from which wild salmon and sea-trout will pass close to the farm (see response from the SDSFB). Salmon smolts from rivers on the mainland of Scotland to the south and east of the proposed farm are also likely to pass within 20km as they migrate through the coastal waters where WRASFB has the responsibility for safeguarding wild salmon and sea-trout.

Larval sea lice are known to move downwind of their sources of origin and infectious stages are likely to be present within the water column up to 40km from the source of origin depending on wind and currents (See Johnsen *et al* 2016 <http://www.int-res.com/abstracts/aei/v8/p99-116/>). The prevailing wind in this area is from the southwest and it is likely that any larval lice from this proposed farm will drift to areas through which salmon smolts from other rivers, including the rivers Carron, Ling, Elchaig, Croe, Shiel, Glenmore, Glen Beag, Arnisdale and quite possibly rivers further south including those within Lochaber, will pass.

The general area of the proposed fish farm has been subject to high levels of infectious parasitic sea lice during the second year of production cycles in recent years. Some of the fish farms within the SSPO reporting area of Skye and Small Isles area North, are located less than 30km from some of the fish farms

within the SSPO reporting areas of Loch Long/Croe and the SSPO reporting area on Carron/ Kishorn. Therefore, for the purposes of managing parasitic sea lice, they, in effect, could be considered to belong within one large fish health management area. Fish farm companies may have already recognised this, as production within all three areas has largely been synchronised in recent years.

The WRASFB has concerns that wild salmon smolts migrating through coastal waters in this area were subjected to significant adverse impact from salmon farms within this Inner Sound /Loch Carron /Loch Duich sea louse management area during 2012, 2014 and 2016. The reported levels of on-farm sea lice in these management areas were far above the Code of Good Practice threshold for treatment which, it should be remembered, is there to prevent adult female sea lice from breeding.

Catch records from rivers within these SSPO reporting areas are consistent with the hypothesis that sea lice infection pressures have already caused elevated mortality of wild salmon smolts migrating through these areas. Grilse (1SW) catches have fluctuated in correlation with the salmon farm production cycles and their corresponding sea lice infestation. (see graphs in appendix below)

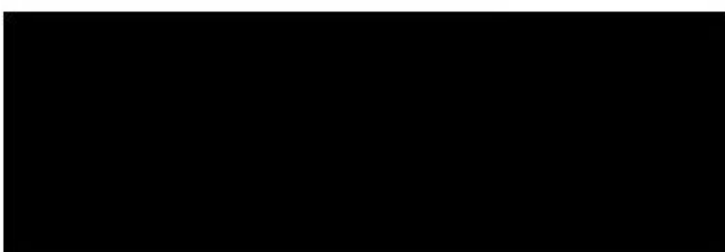
In a similar situation, scientists in Ireland have investigated the impact to wild salmon, which migrate to sea from the River Erriff, from sea lice emanating from salmon farms within the area. This also suggests that sea lice infestation levels, emanating from salmon farms have strongly reduced annual returns of 1SW Erriff salmon.

(See Shephard and Gargan, 2017 <http://www.int-res.com/abstracts/aei/v9/p181-192/> & <http://www.fisheriesireland.ie/Press-releases/new-study-finds-that-sea-lice-from-salmon-farms-can-cause-a-50-reduction-in-runs-of-wild-atlantic-salmon.html>)

Referring back to the original planning consent for the existing Sconser fish farm (11/00181/FUL), many assurances were given about the applicant`s ability to control sea lice. Marine Scotland backed this up with the statement that efficient measures were in place to ensure effective sea lice control...as far as could be foreseen. Despite these assurances and attestations regarding efficient measures, actual sea lice control is still not being consistently achieved.

We believe that it has now come to the stage where promises of sea lice control (in a planning application) should be replaced with hard facts and a clear demonstration of control needs to be submitted at the pre-application stage. It would also be crucial that any required EMP should be required to be submitted and agreed prior to an application being made. The graphs (in appendix below) are “flagging up” a correlation between the higher levels of sea lice during the second year of fish farm production and a reduction of returning wild grilse. Given the current number of fish farms in this area and the desire for further planned fish farm expansion (see map in appendix below), it may be premature to grant planning permission for any fish farm in this area until a thorough scientific investigation of past and current impacts from salmon farming to wild salmon and trout populations, involving Marine Scotland Science, can be carried out.

Yours sincerely,

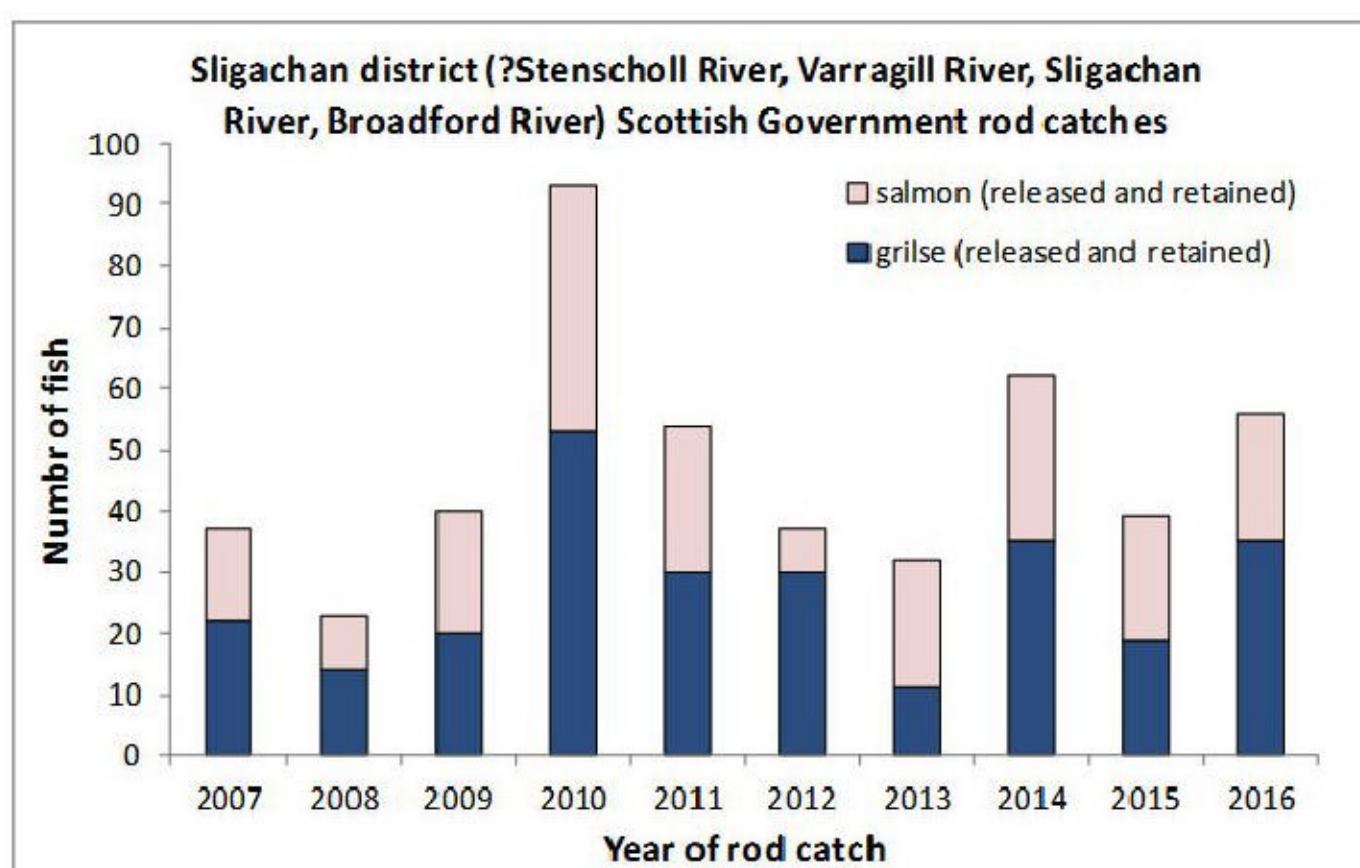
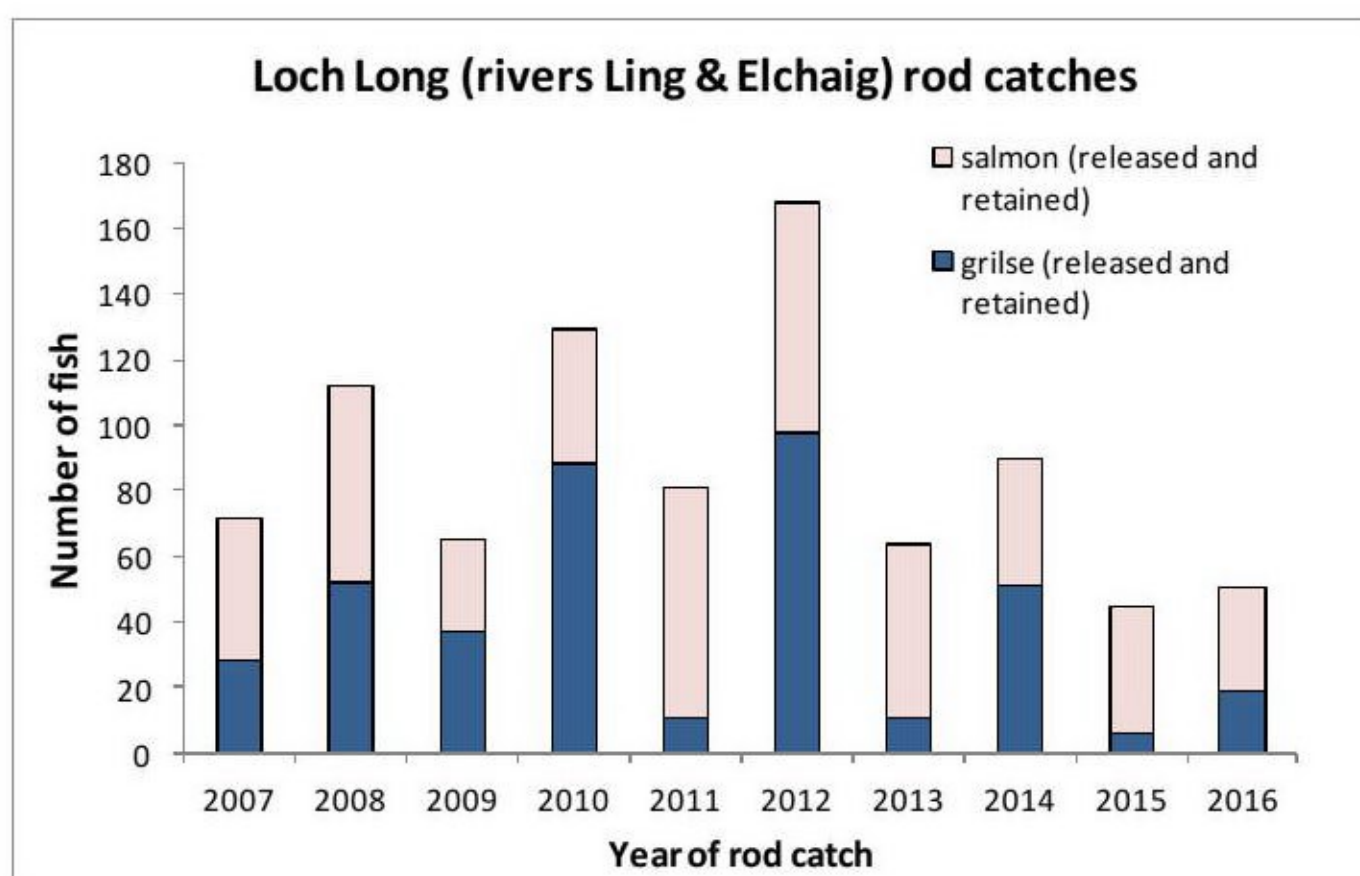
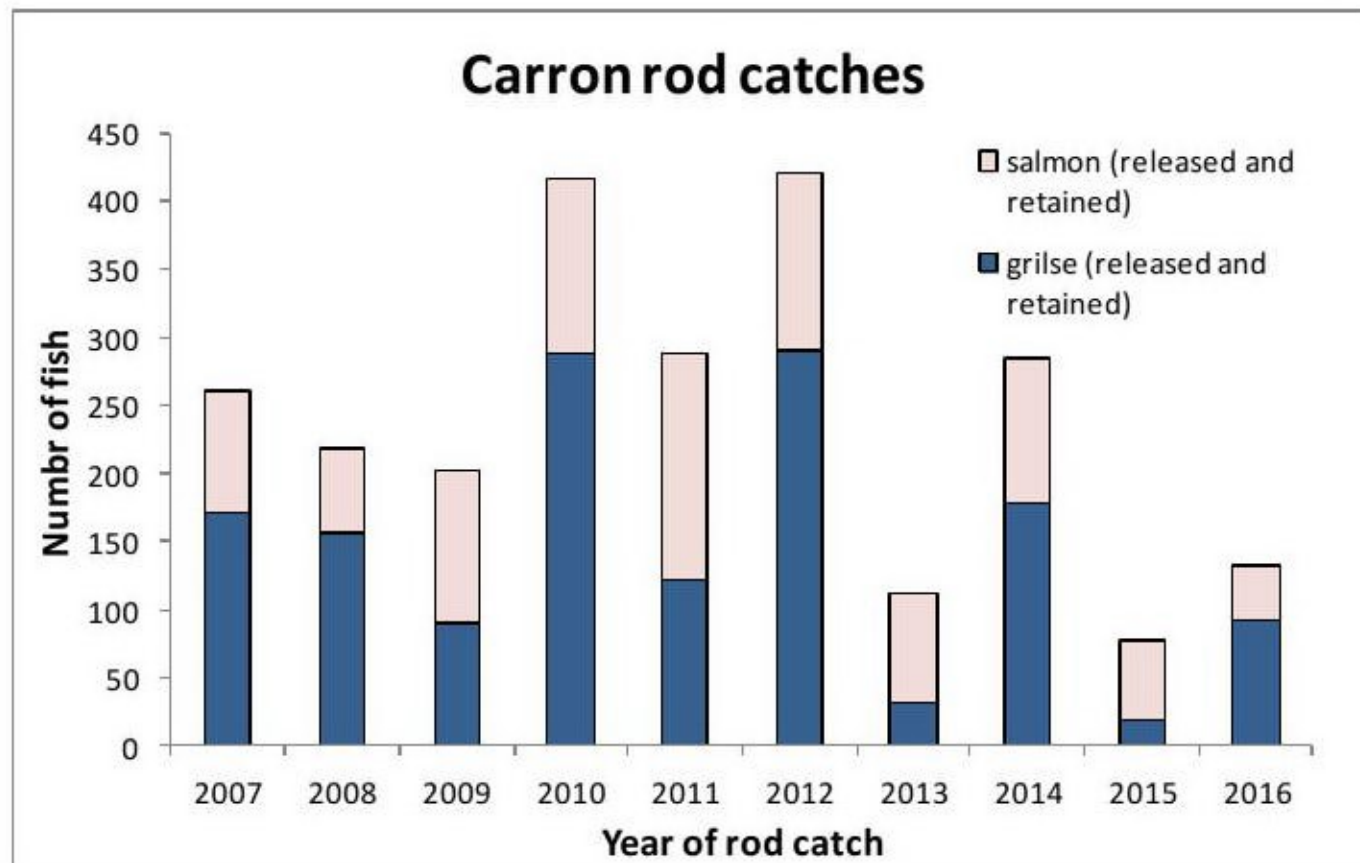
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Bill Whyte
WRASFB Chairman

APPENDIX 1: Supplementary information

1. Scottish Government rod catches

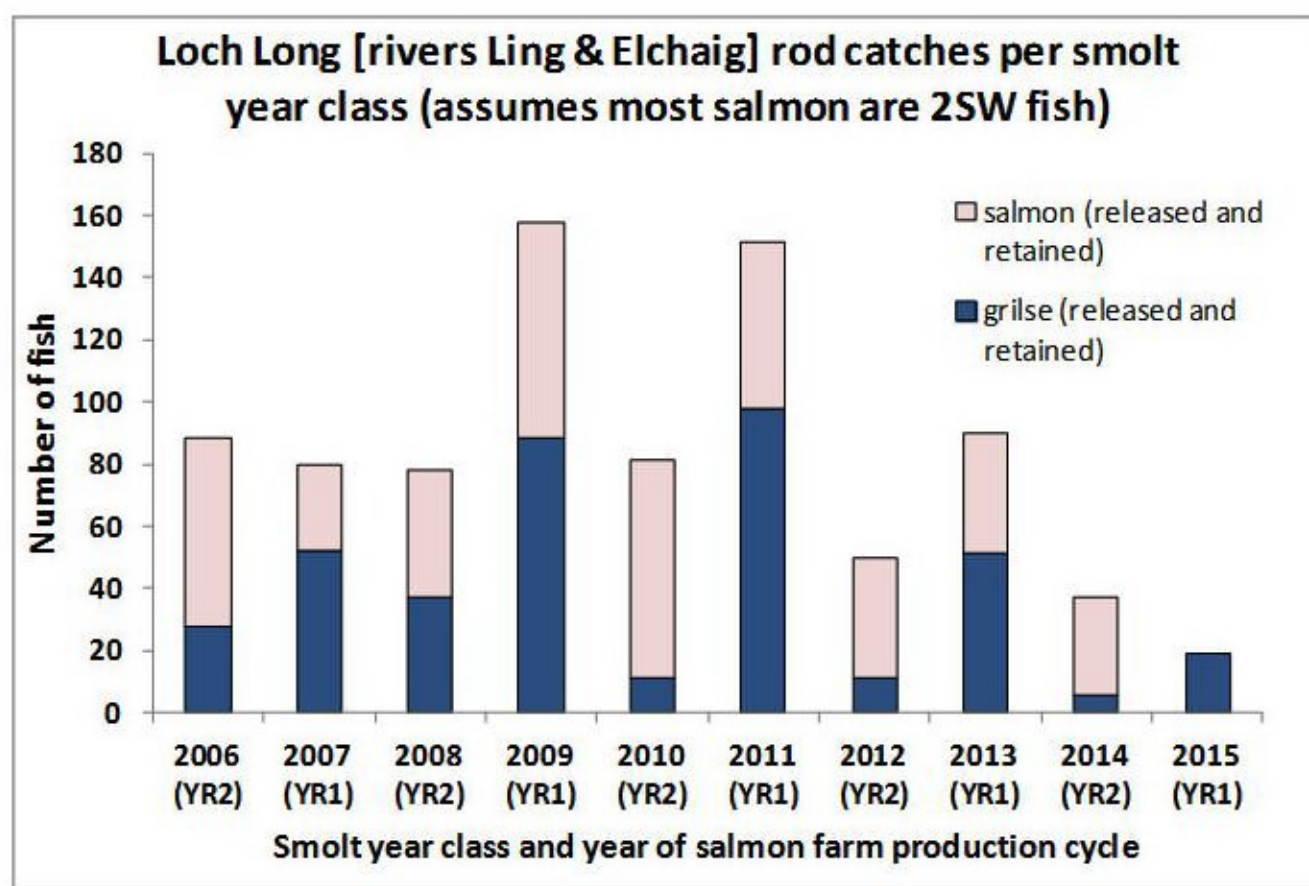
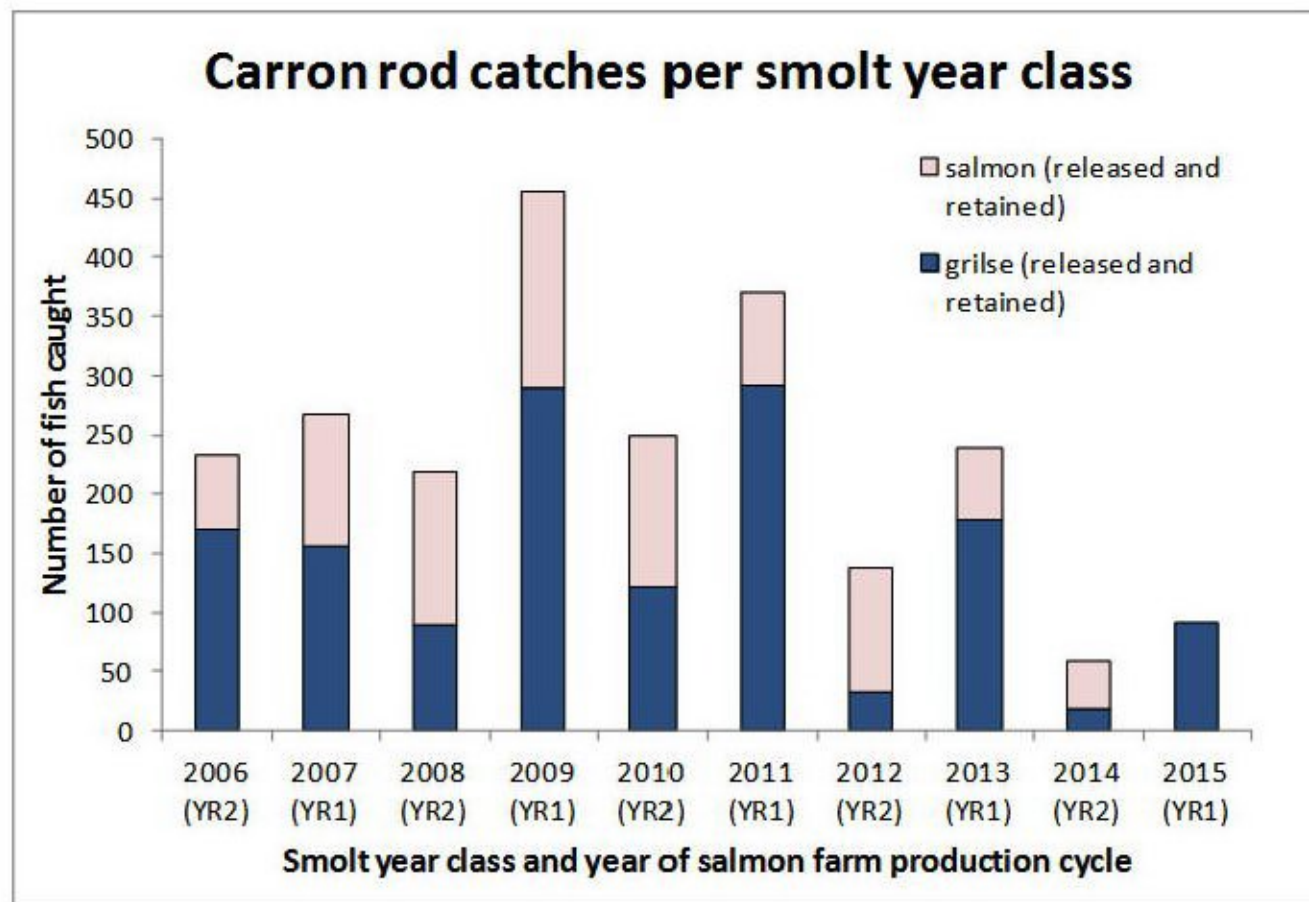
Figures from Scottish Government Rod catch statistics <http://www.gov.scot/Publications/2017/04/5245>



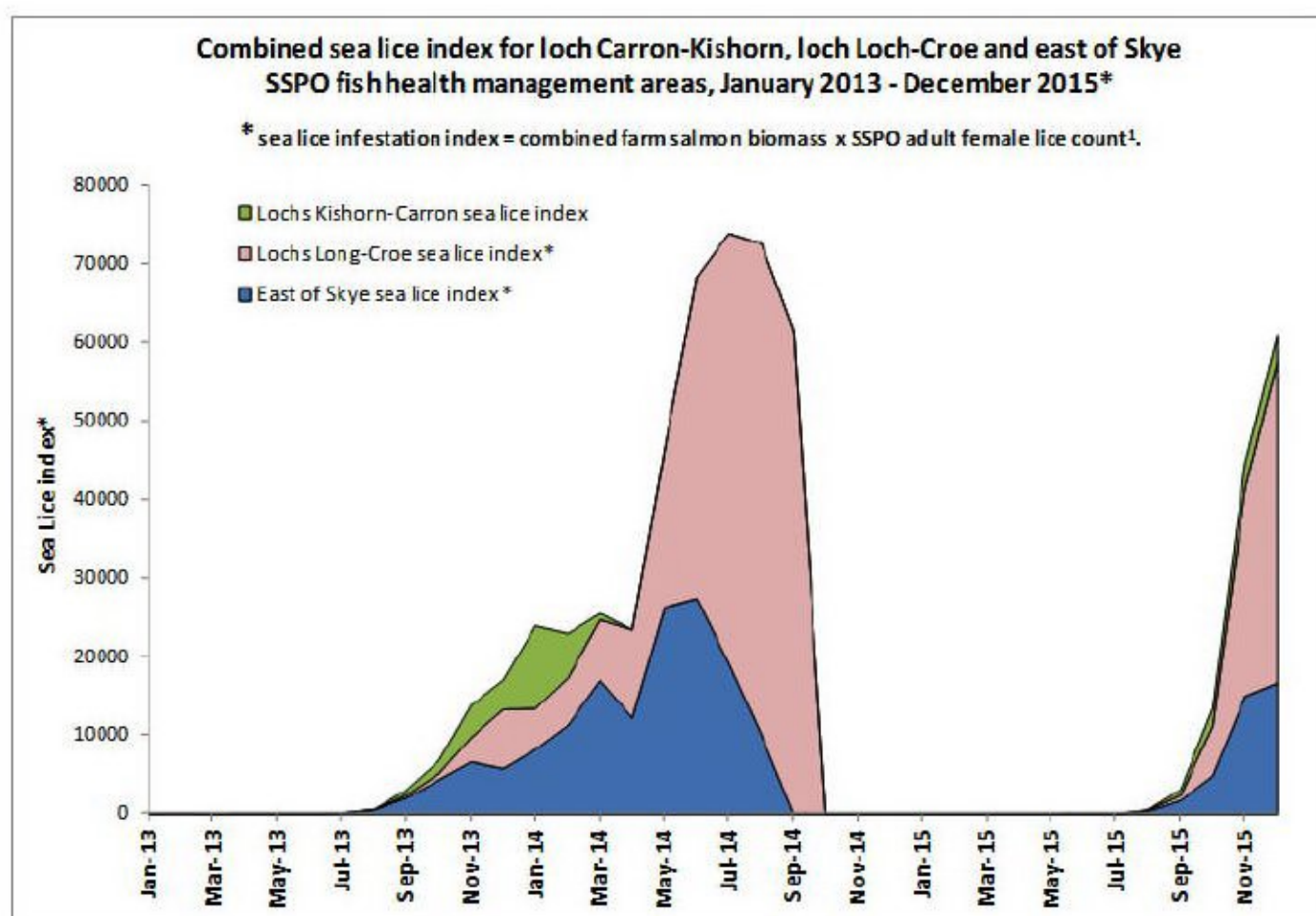
2. Rod catches from wild salmon smolt year classes for rivers in area affected

*assumes that 'salmon' are all 2SW fish; in practice some 3SW fish will also be present

Figures from Scottish Government Rod catch statistics <http://www.gov.scot/Publications/2017/04/5245>



3. Graph of on-farm sea lice levels for area



Note ¹.

Figures for farm salmon biomass have been compiled from those published on Scotland's Aquaculture website <http://aquaculture.scotland.gov.uk/>; figures for monthly lice averages (adult females) have been taken from the SSPO fish health report <http://scottishsalmon.co.uk/publications/>.

4. Map of existing, planned and proposed salmon farms

This map is based on information from [Scotland's Aquaculture website](#) and [Highland Council e-planning website](#).

