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Environment

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Friday 24th March 2017

Dear Mr Kerr

Re-equipment of an existing marine fish farm at Port Na Croe, Isle of Shuna. Ref 16/03407/MFF

I am writing on behalf of members of Scottish Environment LINK Marine Group to voice our concerns about some elements of the application for proposed changes to the existing Port Na Croe fish farm, Isle of Shuna, Argyll and Bute.

The Port Na Croe fish farm is located within the Loch Sunart to the Sound of Jura MPA. Research carried out by SEPA has shown that the benthic sediments in the Sound of Shuna have already breached Environmental Quality Standards in respect of contamination with the chemical sea lice therapeutant, Emamectin Benzoate. Farms operated by Marine Harvest were amongst the worst offenders in relation to this chemical. The neighbouring farm at Rubh an Trilleachain, suffered a major mortality event in 2016, losing over 400 tonnes of salmon, and had to apply for permission to use additional quantities of sea lice chemicals. Coupled with that, a study commissioned from SAMS has shown that Emamectin Benzoate (EMB) released from fish farms causes substantial mortality of wild crustaceans (up to 90% of the population) at some considerable distance from the limits of the farm. This mortality was found to be "at a sea loch scale" and to cause 'wide scale and cumulative impacts' that 'are observable when EMB concentrations are at or below current detection limits'. It is therefore inevitable that the Environmental Quality Standards, which are necessarily based on detectable limits of residues, will substantially underestimate the potential impacts on wild populations of crustaceans.

Increased mortality of crustaceans will not only impact important local creel fisheries but potentially also the benthic invertebrates on which the local population of common skate depends. Common Skate have been reported in this part of the Loch Sunart to the Sound of Jura MPA and are likely to transit through the Sound of Shuna. SEPA have undertaken to review existing consents for fish farms to discharge Emamectin Benzoate in the light of this research and it is to be expected that this will result in the reduction in some biomass limits. It would be premature to grant permission for modifications to this farm before this review has been completed.

We welcome the use of top netting, tension netting, seal blinds and lift up technology to reduce marine predator interactions, as detailed in the application.

The site contains significant concentrations of seals and cetaceans. Shuna Sounds falls within the candidate harbour porpoise Special Area of Conservation and frequently used by harbour porpoises, including mother and calf pairs. Harbour porpoises are sensitive to noise pollution, and the disturbance and displacement impacts of acoustic deterrent devices (ADDs) are well known, including substantially reducing porpoise densities over very considerable areas. For example, Olesiuk *et al.* (2002) showed that porpoise densities were reduced by around 90% within 3.5km of a fish farm ADD (the maximum distance

at which they looked for effects) and Brandt *et al.* (2013) showed that all observed porpoises avoided a seal scarer within 1.9 km. In Scottish waters, Northridge *et al.* (2013) and Booth (2010) demonstrated that the use of ADDs disturbs porpoise over a wide area (around 7 Km) and potentially 'block' channels to porpoise. Shuna Sounds is narrow, which may similarly increase impacts. As a result, we object to the use of ADDs at the site. We understand that the existing neighbouring fish farm has a licensing condition not to use ADDs so maintenance of this approach would mean consistent impact management.

Whilst it is beyond the scope of this application, we believe that a review and a habitats regulation assessment of the use of ADDs in the cSAC is required.

We also object to the shooting of seals, and strongly request that only passive deterrents, such as those mentioned previously, be consented. We note the recent US Ruling on fish imports and international marine mammal bycatch criteria and the resulting Scottish Salmon Producers Organisation commitment to reduce seal shooting to zero, which we wholeheartedly support.

Yours sincerely



Calum Duncan

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Convenor, Scottish Environment LINK Marine Group
www.scotlink.org/workareas/marine/

On behalf of:

Hebridean Whale and Dolphin Trust
National Trust for Scotland
Whale and Dolphin Conservation

Marine Conservation Society
Scottish Wildlife Trust

References

Booth CG. 2010. Variation in habitat preference and distribution of harbour porpoises west of Scotland. PhD thesis. University of St Andrews.

Brandt MJ, Höschle C, Diederichs A, Betke K, Matuschek R and Nehls G. 2013. Seal scarers as a tool to deter harbour porpoises from offshore construction sites. *Marine Ecology Progress Series*, 475, 291-302.

Northridge S, Coram A, and Gordon J. 2013. Investigations on Seal Depredation at Scottish Fish Farms. Edinburgh: Scottish Government.

Olesiuk PF, Nichol LM, Sowden MJ and Ford JKB. 2002. Effect of the sound generated by an acoustic harassment device on the relative abundance and distribution of harbor porpoises (*Phocoena phocoena*) in Retreat Passage, British Columbia. *Marine Mammal Science*, 18, 843-862.



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