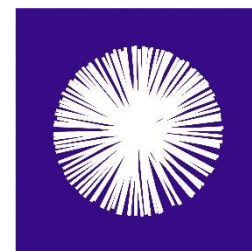


**Written response to CAR/L1188421**  
**Horse Island Marine Pen Fish Farm**  
**Scottish Sea Farms**



Scottish  
Environment

**LINK**

**Date: October 2020**

### **Summary**

- LINK members are concerned about the impact the proposed development would have on the protected features of the Wester Ross Marine Protected Area, primarily through increased sedimentation caused by waste released from the farm, and also through the proposed use of Slice (emamectin benzoate).
- LINK consider the recommendations from the Rural Economy and Connectivity Committee's inquiry into salmon farming in Scotland, in particular those that focus on waste management and impacts on MPAs and Priority Marine Features, have not been considered.
- LINK believe that the proposed development does not align with the objectives of SEPA's Aquaculture Sector Plan, in particular ensuring "all businesses in the sector reach and maintain full compliance with Scotland's environmental protection laws".
- LINK are concerned over the growing number of salmon farm proposals located within MPAs and consider it vital that SEPA and the Scottish Government advance the spatial strategic guidance and assessment of potential impacts salmon farming has on MPAs and PMFs, and clarify their position on new and existing salmon farms in MPAs.

### **Introduction to Scottish Environment LINK**

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35-member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

LINK members welcome the opportunity to comment on this application.

### **Introduction**

LINK Marine Group members would like to register their concerns over Scottish Sea Farms' application for a salmon farm adjacent to Horse Island. The proposed location lies within the Wester Ross Nature Conservation Marine Protected Area, which contains a number of designated features that would be at risk from food, medicine and faecal waste released from the salmon farm.

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It is the view of LINK members that the proposed developed is inappropriately located and places unnecessary risks on the surrounding benthic habitats, many of which are protected features of the Wester Ross MPA.

### Impacts on protected features

The Wester Ross MPA was designated in 2015, with the conservation objective to 'recover' maerl beds and 'conserve' the other protected features within the MPA.<sup>1</sup>

The protected features within the MPA are:

- burrowed mud
- circalittoral muddy sand communities
- flame shell beds
- kelp and seaweed communities on sublittoral sediment
- maerl beds
- maerl or coarse shell gravel with burrowing sea cucumbers
- northern feather star aggregations on mixed substrata

All of these features are benthic habitats and are, therefore, at risk from increased sedimentation and smothering (particularly for maerl beds<sup>2</sup>. The waste material released from an open-cage salmon farm would, therefore, pose a direct risk to these features.

The proposal at Horse Island is adjacent to known records of maerl beds (as recorded on Marine Scotland's National Marine Plan Interactive), and the applicants benthic survey of the site identified maerl beds and maerl or coarse shell gravel with burrowing sea cucumbers present within the survey transects. Other protected features identified within the benthic surveys are:

- burrowed mud
- northern feather star aggregations, and
- kelp and seaweed communities on sublittoral sediment.

Therefore, it seems evident that the proposed salmon farm would present a direct risk to maerl, for which the MPA has a 'recover' objective, and three other protected features, which have a 'conserve' objective. Indeed, there is a 'target management area' for maerl identified adjacent to the proposed site<sup>3</sup>, which this development has the potential to directly impact.

The features designated for protection support a wide range of marine species and provide important nursery grounds, including for some commercially important species (for example, maerl beds are important nurseries for scallops). Damage to these habitats would, therefore, have an impact on the wider ecosystem.

Additionally, the chemicals proposed to be used by Scottish Sea Farms will also pose a risk to marine species. Of particular concern is the proposed used of the in-feed sea lice treatment, Slice (emamectin benzoate). Slice has been found to cause substantial (60-90%) mortality of wild crustaceans, which includes commercially important species such as crabs, lobsters and nephrops.<sup>4,5</sup> Within Scottish Sea Farms' benthic survey for the site, squat

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<sup>1</sup> Wester Ross NCMPA - <https://www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/marine-protected-areas/nature-conservation-mpas/wester-ross-ncmpa-designation>

<sup>2</sup> Hall-Spencer, J. et al. (2006) Impacts of fish farms on maerl beds in strongly tidal areas. Marine Ecology Progress Series. 326: 1-9

<sup>3</sup> Scottish Natural Heritage Commissioned Report No. 764: Upper Loch Fyne and Loch Goil pMPA and Wester Ross pMPA - the identification of conservation management areas to support protected feature recovery

<sup>4</sup> SARF Report: Towards understanding of the Environmental Impact of a Sea Lice Medicine - <http://www.sarf.org.uk/cms-assets/documents/251503-644637.sarf098---whole-document-aug2016.pdf>

<sup>5</sup> Burrige, L., Weis J., Cabello F., Pizarro, J. and Bostick, K. (2010) Chemical use in salmon aquaculture: A review of current practices and possible environmental effects. Aquaculture. 306 (1-4): 7-23.

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lobster and burrow sites, thought to be nephrops, were identified, along with other burrowing megafauna. The site is also regularly fished by local creelers. The use of Slice has the potential to cause damage to the surrounding ecosystem and also have an economic impact on the local creel industry.

In addition to their ecological and economic importance, many of these features are recognised as 'blue carbon' habitats, known for their potential to capture and store carbon. Maerl beds are recognised as a significant blue carbon store, capable of locking away carbon for hundreds, if not thousands of years.<sup>6</sup> However, due to their slow growth rate, maerl beds are particularly sensitive, and any physical damage (e.g. smothering due to increased sedimentation) could cause long-lasting, if not permanent, damage.

It is also important to recognise that the [Marine Conservation Order](#) for the MPA, which places management measures for commercial fishing activity within the MPA, prohibits demersal trawls and dredging at the same site of the salmon farm proposal. It would seem perverse to prohibit one activity in order to protect the MPA features, yet allow another that directly affects the same features.

### Recommendations from the Rural Economy and Connectivity Committee

In 2018, the Rural Economy and Connectivity Committee's inquiry into salmon farming in Scotland provided a set of recommendations for the future growth of the industry. These included:

- **RECOMMENDATION 29**

The Committee believes that it is essential that the issue of waste collection and removal is given a high priority by the industry, the Scottish Government and relevant agencies. It is clearly one of the main impacts on the environment and needs to be addressed as a matter of urgency.

- **RECOMMENDATION 48**

The Scottish Government should provide strong and clear leadership in ensuring that the precautionary principle is applied, producing appropriate policy and guidance documents as necessary. These should make clear that the potential impact on the environment, known wild salmon migratory routes and other species must be comprehensively and robustly assessed and fully taken into account as part of the consideration of salmon farm applications.

- **RECOMMENDATION 51**

It is therefore of the view that the Scottish Government should, as a matter of priority, initiate a spatial planning exercise with a view to developing strategic guidance specifying those areas across Scotland that are suitable or unsuitable for siting of salmon farms. This work should take full account of existing strategic documents such as the Marine Plan, and incorporate an assessment of the potential impact of salmon farms on Marine Protected Areas (MPAs) and Priority Marine Feature (PMFs) and the species which inhabit them.

Scottish Sea Farms' proposal for a salmon farm off Horse Island indicates that the recommendations from the RECC inquiry have not been considered, particularly with regard to waste management and impacts on MPAs and PMFs. The continued pursuit of a CAR licence for a poorly located site within an MPA, which their own benthic surveys identify contains PMFs, indicates a disregard for the conservation objectives of the MPA.

Recommendation 51 of the RECC report highlights the need for strategic spatial guidance and an assessment of the potential impacts of salmon farms on MPAs, but these have not yet been produced. In their absence, and to achieve the objective of Recommendation 48 – provide strong and clear leadership in ensuring that the precautionary principle is applied – the Scottish Government (and SEPA) must provide clearer guidance on

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<sup>6</sup> NatureScot: Maerl beds - <https://www.nature.scot/landscapes-and-habitats/habitat-types/coast-and-seas/marine-habitats/maerl-beds>  
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salmon farm proposals that have the potential to directly impact protected features. The first objective in SEPA's Aquaculture Sector Plan is to 'ensure all business in the sector reach and maintain full compliance with Scotland's environment protection laws...', which must surely apply to new proposals within MPAs.

It is LINK's view that Scottish Sea Farms' proposal is an example of the type of proposal the REC Committee were aiming to deter – i.e. the use of traditional, open-cage designs within an MPA and posing a direct threat to protected features. The proposed activity does not align with the conservation objectives of the Wester Ross MPA and with advancements made in semi-closed and offshore sites, this proposal represents a move in the wrong direction for the salmon farming industry.

While this letter is in response to a specific application, LINK members are increasingly concerned over the continuation of proposals for open-cage salmon farms within Scotland's MPA network. In order to conserve and improve the health of Scotland's marine environment, it is imperative that these proposals are discouraged. We consider it vital that SEPA and the Scottish Government advance the spatial strategic guidance and assessment of potential impacts salmon farming has on MPAs and PMFs, and clarify their position on new and existing salmon farms in MPAs.

This response is supported by the following LINK members: Fidra, Hebridean Whale and Dolphin Trust, Marine Conservation Society, Whale and Dolphin Conservation, and the Scottish Wildlife Trust

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