

ARGYLL DISTRICT SALMON FISHERY BOARD

Cherry Park, Inveraray, Argyll, PA32 8XE

Development and Infrastructure Services
Argyll & Bute Council
1A Manse Brae
Lochgilphead
PA31 8RD

25th February 2019

Your Ref. 19/00233/SCRSCO

Dear Sir / Madam,

Screening and scoping opinion: New marine fin fish farm East Off Hawk's Nib, South East Coast Of The Island Of Bute Argyll And Bute

On behalf of the Argyll District Salmon Fishery Board we are keen to state our considered opinion that an Environmental Statement (ES) should accompany the planning application for the proposed new rainbow trout farm off south East of the Isle of Bute.

It is our view that this application to farm between 2,000 and 3,000 tonnes of rainbow trout represents a further challenge to migratory salmonid fish natal to the numerous rivers that flow into the Firth of Clyde which include important fisheries on the Rivers Ruel, Goil, Eachaig, Clyde and Lomond where there is a Special Area of Conservation (SAC) for salmon (on the River Endrick). You will also be aware of the recent recommendations made by the Scottish government's REC Committee;

RECOMMENDATION 45

The Committee shares the view of the ECCLR Committee that the siting of farms in the vicinity of known migratory routes for wild salmon must be avoided. (see paragraph 384)

RECOMMENDATION 46

The Committee is of the view that a similar precautionary approach must be taken in Scotland to assist in mitigating any potential impact of sea lice infestation on wild salmon. It therefore recommends that there should be an immediate and proactive shift towards siting new farms in more suitable areas away from migratory routes and that this should be highlighted in the strategic guidance on the siting of salmon farms. (see paragraph 386)

Based on these recommendations we propose that the ES should consider migratory fish pathways of salmon smolt migration from Loch Striven, Loch Long, the Loch Lomond catchment and Ayrshire Rivers.

The ES also needs to identify how the production of rainbow trout at the proposed new site will be managed alongside existing fish farming operations in the Firth of Clyde in relation to management of fallow periods and strategic sea lice control.

Chairman – Roger Brook

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Additionally, the applicant needs to develop an Environmental Monitoring Plan which detail how they plan to monitor potential for interactions with wild fish populations and how this will affect management of farm production.

In summary, it is the view of the Argyll District Salmon Fishery Board (ADSFB) and Argyll Fisheries Trust (AFT) that no development of new fish farming sites should be permitted until the fish farming company can;

- Provide a production plan of their farming operations and how this relates to existing farming in the Firth of Clyde (Kilbrannan Sound & Loch Fyne).
- Identify the likely migration routes of salmon smolts in Firth of Clyde and how the farm may affect them.
- Provide detail of how the applicant will manage sea lice; implement control measures that can reduce emissions of sea lice larvae.
- ensure the health of wild fish populations are monitored to establish if the site can operate sustainably with minimal impact on wild fish in the longer-term.
- provide a commitment to undertake all possible actions to recover escape farm fish and recognise damage to the fishery amenity caused by escapes.

The above may be part of an Environment Monitoring Plan that is linked to their planning permission. To fully reflect the environment in which the additional production is situated, the EMP should in effect monitor what is happening in a farm management area due to the linkages of tidal and wind-driven movement of sea lice larvae and movement of any farm fish which may escape. On this basis, EMPs need to include both the management of sea lice larvae production in a farm management area as well as collecting representative data on wild fish that reflect the health of the ecosystem.

Yours sincerely

Robert Younger
Clerk to the Argyll District Salmon Fishery Board