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11 January 2022

Dear Sirs,

Re: Loch Hourn fish farm expansion Highland Council planning reference 21/05582/FUL

The John Muir Trust has considered the proposed expansion of the MOWI operated fish farm in Loch Hourn. As a conservation charity dedicated to the experience, protection and repair of wild places, we take an interest in development that might harm wild places, their indigenous species and habitats. This particular application is near Trust land and was brought to our attention by members of the local community. The Trust purchased Li and Coire Dhorrcail, 1,255 hectares on the north-eastern slopes of Ladhar Bheinn, a mountain above Loch Hourn, in 1987. We have been working to restore native woodland at this property in the years since. Loch Hourn is within the Knoydart National Scenic Area and is surrounded by Kinlochhourn-Knoydart-Morar Wild Land Area – one of the wildest and most beautiful parts of Scotland.

We have the following observations and comments to make with respect to this application.

- 1) The nationally important landscape is a constraint on the expansion of fish farms in Loch Hourn, particularly expansion of fish farms located further inland within the loch. This is recognised in the Highland Council's Aquaculture Framework for Loch Hourn 'The need to conserve the scenic quality and landscape character of the loch inevitably constrains the development options for aquaculture installations and shorebase facilities, particularly in the sensitive inner area.'
- 2) Wild salmon populations in Scotland are at a record all-time low. Already salmon populations in the Barisdale and Guiseran Rivers are extinct. Salmon populations in the Arnisdale River are close to extinction and the same is true for the Glenelg and Glen Bheag Rivers (see chart 'Arnisdale river catches 1980-2020' submitted with this letter, and graphs at page 5 of Marine Scotland Science's response). In 2018, the Scottish Government identified 12 high-level pressures, including fish farms, that could be contributing to the decline of wild salmonids. A Report from the Salmon Interactions Working Group (published April 2020) followed. This contains 42 recommendations for action which have all subsequently been accepted by the Scottish Government.
- 3) The recommendations of the Salmon Interactions Working Group Report are relevant policy context to this application's proposed plans to increase biomass. The Report accepts that fish farms are having a detrimental impact on Scotland's wild salmon and sea trout populations, stating, 'In managing the impact of aquaculture activities on the environment greater priority should be given to the protection of wild migratory salmonids balanced with

more efficient protection of seabed and water quality in line with the Scottish Regulators Strategic Code of Practice' (paragraph 1.8, page 6). It recommends, 'As a priority, the consenting of new developments should be managed within an adaptive spatial planning model which is risk based, of suitable resolution, underpinned by best available scientific evidence, and takes into account the cumulative effect of management practices of existing developments and impacts on wild salmonid fish.' (paragraph 2.4, page 8)

- 4) One serious impact of fish farms on wild salmonids is the spread of sea lice from farmed salmon to wild salmon and the resulting rises in mortality rates of wild salmon infected by sea lice. The proposals to increase the biomass from 2500t to 3100t at the existing fish farm will invariably lead to increased sea lice contamination amongst farmed fish, spreading to wild salmonids (Marine Scotland Science agree this is a problem, see page 6 of their response). Sea lice can travel for miles out to sea and therefore the full extent of harm to migrating wild salmon is hard to know but it is reasonable to conclude there will be harm to wild salmon in Loch Hourn and the surrounding coastal waters (see Figure 2 in 'Loch Hourn Sea Lice Modelling Report Summary', a report from the Friends of Loch Hourn Group submitted with this letter, which shows a snapshot of hydrodynamic modelling of the dispersion of particles representing sea lice from seven salmon farms, including Loch Hourn). In our view, the degree of risk is high enough, at a time when the state of Scotland's salmon populations – including populations along the rivers feeding into Loch Hourn - is dire enough, to justify a precautionary policy approach to fish farm expansion along Scotland's west coast, including at this particular site.
- 5) Although there are chemical controls for sea lice, and MOWI already use these at the Loch Hourn site, these are known to be environmentally harmful. In a sensitive marine environment, increasing the chemical controls for sea lice tries to address one problem whilst causing wider collateral environmental harm. Important marine species in Loch Hourn which have already suffered from chemical pollution from the existing fish farm operations, according to Friends of Loch Hourn and members of the Arnisdale community, include maerl beds, native oysters, wild salmon, sea trout, northern feather stars, tall sea pens and fireworks anemones. These wider environmental impacts should be taken into consideration when the Highland Council review the sea lice management and chemical control plans submitted by MOWI. The Highland Council should be satisfied that environmental monitoring conditions attached to any previously approved MOWI fish farm expansion planning applications have been fulfilled.
- 6) There is evidence to suggest that the capacity Loch Hourn has to cope with the environmental pressures from fish farms located in the Loch has been reached. An increase of biomass at this fish farm would tip the 'carrying capacity' beyond what is sustainable and environmentally safe in a number of ways.
  - a. Benthic environmental monitoring during 2006, 2013 and 2015 were all graded as 'unsatisfactory' by SEPA. This necessitated a reduction in biomass (which had reached 3300 tonnes in 2015 and had resulted in seabed damage) to 2500 tonnes and the reconfiguration of the fish farm pens. Unless MOWI can demonstrate how its practices have changed and can guarantee that benthic monitoring will receive satisfactory grading, it seems contrary to the recommendations of the Salmon Interactions Working Group Report and environmentally unsafe to approve these plans.
  - b. A report from the Friends of Loch Hourn Group, 'Loch Hourn Sea Lice Modelling Report Summary' highlights that increasing the biomass at the existing site would

increase the already high risk of sea lice contaminating wild salmon and sea trout, casting doubt on the sustainability of any expansion. From the Report: 'In 2020, SEPA and Nature Scot conducted a risk assessment of the impact of relaxing SEPA's caps on peak fish farm biomass during the Covid-19 pandemic. This assessment recognised that Loch Hourn has one of the lowest flushing rates of all sea lochs in Scotland and therefore presents the highest risk of interaction between sea lice from fish farms and wild salmon and sea trout.' (A low flushing rate means sea lice larvae and parasitic copepodids are maintained in the loch at a density that threatens the survival of wild smolts.)

- c. The Highland Council's Aquaculture Framework Plan for Loch Hourn (published plan dated 2001) clearly states the limiting carrying capacity of Loch Hourn and the slow 'flush rate' of the loch. The Plan recommends caution is applied, especially in the absence of data on the environmental impacts of existing fish farms in the loch: 'To date no empirical research has been carried out in Loch Hourn to establish its biological carrying capacity (eg for shellfish and finfish production) and the Council normally does not have the resources to carry out this type of modelling work. In the absence of such information a cautious approach should be taken in relation to developing new sites to ensure that as far as possible the carrying capacity of the loch is not exceeded and growth rates are maintained.'
- 7) According to the Planning Application, an application to vary the CAR licence (a licence under the Water Environment (Controlled Activities) (Scotland) Regulations 2011) is also being made to SEPA. Determination of the present application should be informed by the outcome of the CAR application and SEPA's advice.
- 8) Loch Hourn has a high conservation value for the future restoration and protection of wild salmonids with five salmon and sea trout breeding rivers in the vicinity. It also has a high sensitivity in relation to fish farm operations (see findings from a report by the Rivers and Fisheries Trust for Scotland, published in 2013, 'Technical report on locational guidance and zones of sensitivity'). The sensitivity of the location and Loch Hourn's high conservation value justify applying a precautionary approach to this application.

Under the Nature Conservation (Scotland) Act (2004), The Highland Council has a duty to further the conservation of biodiversity when carrying out its responsibilities. We urge the Highland Council to consider the environmental impacts of the proposed plans very carefully when determining this application.

Yours faithfully,

The John Muir Trust