

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SALMON FARMING IN SCOTLAND

SUBMISSION FROM SAVESEILSOUND

INTRODUCTION

The saveseilsound campaign group was formed in 2011 in response to an application for planning permission to site a fish farm in Seil Sound, following the failure of another site further North due to environmental concerns.

The application generated a lot of objections, which the Argyll & Bute planning committee ignored when they granted the application unanimously.

Local residents have since seen a merciless expansion of permitted biomass in the stretch of water comprising Seil, Shuna and Melfort, which we have always argued deserves to be seen in scientific terms as effectively one medium-sized sea loch, rather than geographically as SEPA insist, open sea or a strait, the significance being that the latter escape the prohibition on new developments in “inshore sea lochs and voes”.

We were among the contributors to the current Consultation before the ECCLR Committee and endorse the findings in their report to you, which, we believe, demonstrates that current policy aimed at doubling the size of fish farm production in Scotland by 2030 is not environmentally sustainable.

In this submission we argue that the policy is also unsustainable economically, because it ignores the diversity of employment and entrepreneurial opportunities in areas such as mid-Argyll, where local micro-economies are fragile and small businesses struggle to be heard against the public relations efforts of large multi-nationals.

The application was part of a pilot relocation project from which Marine Scotland were promised there would be a “lessons learned report” but this has never appeared. Perhaps this paper can go some way towards rectifying that deficiency.

ARDMADDY - A FAILED RELOCATION

In the early years of this Century the Scottish Executive set up a “Tripartite Working Group” comprising representatives of government, the fish farming industry and wild fishery interests to review the environmental problems caused by fish farming and make recommendations.

The group advised that many fish farms, granted without any environmental assessments, were in the wrong place and recommended setting up a “Pilot Relocation Project” in terms of which the taxpayer would sponsor companies to move from damaging sites to ones considered less so. Three sites were chosen, including one

shifting production from Loch Riddon in the Kyles of Bute to Ardmaddy at the North end of Seil Sound and the project went ahead at a reported cost of £370,000.

Loch Riddon was chosen because the Argyll District Salmon Fisheries Board, anglers and environmentalists were reporting serious declines in catches on the River Ruel and attributing the problems to chemical treatments and sea lice from the local fish farm, operated by Pan Fish (Scotland) Limited. This had a direct economic effect on the local economy. With the departure of wildlife fishing visitors stopped coming and several hotels closed. See here:

<http://www.fishpal.com/Scotland/Argyll/RiverRuel.asp?dom=Pal>

Pan Fish already operated a salmon farm at Ardmaddy with a permitted capacity of 800 tonnes. That this made things easier administratively, rather than any assessment on the ground, may have been one reason for the site being selected as a pilot.

The planning application to increase the capacity to 1300 tonnes went ahead practically unnoticed in the community and was signed off by Argyll & Bute's planning officers under their delegated powers.

The application was based on Autodepomod computer modelling, a system developed with input from academics at SAMS and until very recently always used by SEPA to assess the likely consequences of an application for a licence to discharge pollution. SEPA now recognise that the system doesn't produce accurate results and propose to introduce "New Depomod".

At Ardmaddy Autodepomod produced results which turned out to be totally wrong. Within a couple of years seabed surveys confirmed what local residents could have confirmed, that the tidal flows are too complex for computer modelling. Instead of pollution being confined to a small area as intended huge quantities of fish faeces and uneaten food became suspended in the tide and dropped near the approach to the Cuan Sound, with some then entering the highly protected Firth of Lorn Marine Special Area of Conservation. This meant that operations on the site had to cease.

On 8 April 2008 the Ministerial Working Group on Aquaculture report contained the following statement, apparently with reference to Ardmaddy,

"Argyll relocation pilot study underway, with a lessons learned report being written. Funded Integrated Coastal Zone Management (ICZM) demonstration project through WIAA. The two projects encouraged the signing of area management agreements. Final permits are awaited from regulators. Secondee appointed to the SE to project manage pilot study & ICZM demonstration, produce environmental report for SEA, undertake consultation on policy and SE relocation programme and develop a grant scheme. Relocation grant scheme is now open and has state aid approval from the

European Commission. Delay due to industry changes.”

Ten years on, it seems that the Tripartite Working Group has long ago stopped meeting and there is no sign of the “lessons learned report”.

WHAT HAPPENED NEXT

In a rational world this failure would have resulted in the relocation being deemed a failure, but what happened in reality was rather different.

The site was now owned by Lakeland Marine Farm Limited, who applied in 2011 to relocate it about two kilometres further South to Port na Morachd. This site, in English the “Bay of the Big (*i.e. important*) People” is interesting in historical and archaeological terms as a “port of refuge” with an ancient Viking or early Scottish boat noust, dominated by the little fort of Dun Fada and just opposite the Castle of the Dogs on Torsa. With a safe, sheltered shore it was much favoured by kayakers and wild campers, all factors ignored by Argyll & Bute Council in the subsequent planning case.

To the astonishment of locals Lakeland sought not just to relocate but also to increase permitted biomass from 1300 to 2500 tonnes, an increase of 92%. An increase of this amount should have triggered an automatic Environmental Assessment, but Argyll & Bute’s planners decided that this was not necessary, as an “Appropriate Assessment” under the Habitats Directive, an entirely different thing, was called for due to the nearby SAC.

For perspective this biomass would represent 600,000 mature salmon producing organic waste the equivalent to a town with a population of about 110,000.

The application attracted 814 objections, of which over 100 came from residents of Seil, Easdale and Luing, representing about a quarter of the adult population. A further 140 or so came from mid-Argyll, another 125 from the rest of Scotland and about 350 from the rest of the United Kingdom, many of them holiday visitors, and 65 came from abroad. There were also 44 letters in support, of which only one was from a local resident.

As consultees the Argyll District Salmon Fisheries Board argued that it would be better to relocate without simultaneously increasing the biomass, to discover if the new site was truly better than the existing one. This would seem to be the prudent scientific way to have done things.

What followed was a good chance to see democracy in action, Argyll style, at the Corran Halls when the planning committee were unanimous in granting the application.

The issue came down to arguments about jobs – preserving employment in the operating company and its suppliers versus the threat perceived by the local residents, and expressed in their strong objections, to their own jobs in tourism and leisure based businesses.

Politicians from outwith the area spoke in favour, including the Libdem Councillor Currie, despite him knowing that his home community of Islay had protected their jobs by seeing off efforts by a fish farm company to establish a similar operation there (746 locals plus 102 visitors signed the petition against).

Such comments underline a problem with democracy in a huge local authority area such as Argyll & Bute, with semi-industrial population centres such as Lochgilphead and Campbeltown always able to outvote more remote areas. Tiny islands such as Seil and Luing are always under-represented or entirely unrepresented at Council level and their micro-economies are entirely different, private sector work being dependent on tourism and leisure. Argyll & Bute Council, wearing another hat, recognises this and has been promoting the mid-Argyll kayak trail, whose users require sheltered bays such as Port na Morachd.

SUBSEQUENT HISTORY - ARDMADDY SOUTH

It is clear that nobody has got a job out of growing salmon at Ardmaddy South.

After the granting of the application on 2 November 2012 the site lay unstocked until May 2015, when the data shows biomass of 881 tonnes, then a production cycle peaking at 1732 tonnes in September and the site culled in January 2016 with a final tally of 896 tonnes. During this cycle mortalities totalled about 360 tonnes, far above the already unacceptable industry average of 25%.

From January 2016 to date the site has been unstocked, but with floats in place, presumably because otherwise planning consent may be lost. Are the operators hoping for government compensation when they eventually admit defeat on this site?

The former operators of Ardmaddy South were owned by Marine Harvest, who were required to divest themselves of some sites under European competition rules and selected those within Seil Sound among those they wanted to be rid of. In February 2012 Steve Bracken of Marine Harvest told me of his relief that they had done so, as he recognised the problems and wanted production to be moved offshore where possible. He did not then know that Marine Harvest were later to acquire the operators, Morpol, and get a range of sites in Seil and Shuna back.

In Seil/Shuna/Melfort there are currently a total of seven operational fish farms. Three of these, Ardmaddy South, Port na Cro and Shuna Cottage are in line with main tidal streams and have seen devastating problems with sea lice in recent years. In one year more than one million litres of hydrogen peroxide was poured into the Sound in an attempt to mitigate these, in addition to large quantities of more toxic poisons such as emamectin benzoate, which stays active in the environment for much longer periods. These substances are fatal not only to sea lice but to all crustaceans. It can only be a matter of time before the local creel fisheries close down.

Data lodged by the operators with SEPA up to december 2017 show that in the most recent production cycles over the seven farms disease and sea lice infestation resulted in mortalities of over 1600 tonnes, equivalent to about 400,000 mature salmon. Waste disposal has become a growth industry, but is surely not an attractive form of job creation.

Operators in the area who were shooting seals are now entitled to use ADDs, or seal scarers, which have the effect of driving off and probably injuring cetaceans such as porpoises dolphins and whales, which are all occasionally seen, despite it being illegal deliberately to interfere with protected species. This, combined with evidence from recreational divers that the seabed is now an underwater desert in places must inevitably reduce visitor numbers with adverse effects on local businesses providing wildlife trips.

Creel fishers and operators of small tourist businesses such as diving boats and wild life tours have few resources to spend on PR and advertising and take years to establish themselves. When forced to close as the wildlife is destroyed and the landscape littered with industrial equipment their owners will move on. Hotels once closed rarely reopen again.

SUBSEQUENT HISTORY - LOCH RIDDON

Following the relocation there was some modest return of salmon to the River Ruel, but numbers are still nowhere near previous levels. Here is an extract from the latest news (source <http://www.fyneandcowal.co.uk/fisheries/ruel-kandahar>) :

'The Kandahar beat is considered to be the classic Ruel fishery...

The Ruel has a developing reputation as a west coast spate river.... Prior to the arrival of fish farms in Loch Riddon in the 1970s, annual catches on the river averaged about 100 salmon and 400 sea trout. The numbers then dropped dramatically, but recently aquaculture activity in the Loch has diminished and in 2012, the last cages were removed entirely.

Thanks to a re-stocking programme using broodstock caught in the river, there have been very encouraging signs that the numbers of salmon and sea trout returning to the river are increasing significantly and some very good fish have been caught and released.

Fishing activity over the last few years has been low although this situation is very likely to change as the river continues to recover. ...

Fishing is fly only and on a catch and release basis.”

CONCLUSIONS

Scottish Government figures show that the tourism and leisure sector generates 130 times more revenue than aquaculture does. Fish farmers invariably claim credit for all jobs in their area including indirect ones, but the multiplier effect applies to jobs in tourism too. The future for Scotland’s rural economy lies in promoting our landscape as one of the last unspoilt fringes of Europe, our history, heritage and culture with links world-wide and the richness and purity of genuine Scottish wildlife such as our wild seafood. It does not lie in allowing major industrial concerns to abuse our environment in ways that are not permitted in their home countries.

Saveseilsound
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