



## Association of Salmon Fishery Boards

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12th June 2013

Colin Wishart,  
Planning and Development Services,  
Highland Council,  
Glenurquhart Road,  
Inverness  
IV3 5NX

**Application for alteration of existing fish farm to 46 square steel pens at Loch Kanaird, eastern side of Isle Martin - reference 13/01494/FUL**

Dear Mr Wishart,

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFB's operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of salmon conservation regulations. ASFB creates policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling.

We fully support the submission by the Wester Ross Area Salmon Fishery Board. We wish to register our formal objection to this development. In addition to the comments by WRASFB we would make the following points.

Whilst we recognise that the application in question will result in a slight reduction in biomass, we do not believe that significant investment (both private and public money) should be devoted to a site which is poorly located from the perspective of migratory fish. This conclusion is based on the relative sensitivity of the site (as demonstrated by the recently developed RAFTS locational guidance tool) and concerns at the current regime of sea lice management.

We are concerned that the application states that no change from the currently employed treatment techniques will be required. The applicant also makes reference to the WRF Ltd being bound by the requirements of the Industry Code of Good Practice. However, treatment thresholds as set out in the Code are not binding, and the applicant makes no commitment to maintain sea lice levels at any particular level. Aggregated sea lice levels for the area in question, as published by the SSPO show that sea lice levels have consistently been significantly over the CoGP treatment thresholds since February 2011 (Table 1). In addition, the most recent data for the Kennart to Gruinard region<sup>1</sup> demonstrates that the average number

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<sup>1</sup> Available at: [http://www.scottishsalmon.co.uk/repo/SC0154\\_SSPO\\_Health\\_Management\\_FINAL.pdf](http://www.scottishsalmon.co.uk/repo/SC0154_SSPO_Health_Management_FINAL.pdf)

of adult female lice was never below 4 for the first three months of 2013. In the absence of farm-specific, weekly sea lice data, we have no alternative but to assume that sea lice levels at the existing Kanaird site were consistent with these levels. If the applicant does not believe this to be the case, then site-specific sea lice data should be made available to Highland Council for the last three production cycles, in order that performance in relation to the Code of Good Practice can be assessed.

Analysis of sea lice data collected through sweep netting of sea trout post smolts has been carried out 1.5km from the Kanaird site for the past two years as part of the RAFTS Managing Interactions Aquaculture Project. Sea lice epizootics (mass fatal parasite infestations of the earliest life-stages of salmon lice) were observed at this site in both 2011<sup>2</sup> and 2012<sup>3</sup>. Epizootics are characterised by fish being infected at the same time as they entered the sea and epizootics have only been reported in locations with salmon farms. In addition, in both years, more than 10% of fish sampled carried adult sea lice loads which were likely to be detrimental to the fish (33% in 2011 and 48% in 2012).

Whilst we do not support the application as it stands, should Highland Council elect to grant planning consent, we believe that a number of planning conditions are fundamentally important:

1. Sea lice data should be made publically available as a condition of consent.
2. It is notable that whilst the current application does not include an increase in biomass, there is significant scope within the cage layout for future biomass increases to be sought from SEPA. SEPA do not consider the possible negative effects of sea lice in their deliberations and therefore we are concerned at the potential for future expansion at the site, outwith the parameters of Highland Council's decision that an EIA was not required. As a consequence we believe that a formal planning condition should be that no future increase in biomass is permitted without undergoing further screening and scoping for EIA and application for variation of planning consent to Highland Council.
3. No fish should be transferred between existing farm management areas.

	<b>N. Mainland</b>
Dec-Feb '11	Below/9%
Mar-May '11	32%
Jun-Aug '11	138%/149%
Sep-Nov '11	284%
Dec-Feb '12	Data no longer available from SSPO
Mar-May '12	152%
Jun-Aug '12	458%/233%
Sep – Dec '12	263%

Table 1: Aggregated sea lice data for the 'North Mainland' region collected from the SSPO website. Where two values are presented, these represent the percentage above the 0.5 lice per fish and 1.0 lice per fish thresholds, as set out by the Industry Code of Good Practice.

Please do not hesitate to contact ASFB if you require any further information or clarification.

Yours sincerely,



Dr Alan Wells  
ASFB Policy and Planning Director

<sup>2</sup> <http://www.rafts.org.uk/wp-content/uploads/2012/04/RAFTS-Regional-Monitoring-Report-2011.pdf>

<sup>3</sup> <http://www.rafts.org.uk/wp-content/uploads/2013/01/RAFTS-Regional-Monitoring-Report-2012.pdf>