

Submitted to Dawnfresh: South Bute CAR consultation

Submitted on 2021-05-28 [REDACTED]

Introduction

1 What is your name?

Name:

Theresa Nelson

2 What is your email address?

Email:

3 What is your interest in this consultation?

Member of local community

Other:

4 Are you happy for us to publish your response to this consultation?

Yes

Impact on the water environment

5 Tell us about why you think the application will impact the water environment.

Add your comments in the box below. :

Fish faecal matter will affect water quality:

Fish faecal matter will affect water quality, just as the dumping of Glasgow's sewage sludge off south Bute at Garroach Head did. When this process began in 1904 dispersion might have been an accepted theory, but surely in modern times we must realise that dispersion does not equal disappearance, the problem just moves somewhere else while the creator/s of the problem take no responsibility for creating it or cleaning it up. It is only in the past few years that the water around our island has reached 'good' quality again, so it seems absurd to allow this farm, in combination with 2 other proposed Dawnfresh sites nearby, to again put untreated faecal matter equivalent to approximately 105,000 people into the waters - you wouldn't allow our small island population, almost 20 times smaller, to put our untreated faecal matter into the sea, would you? And no form of land farming would be allowed to do this, would it? So it is unacceptable that fish farms are allowed to exploit a resource that belongs to all of us to do it.

Use of highly toxic chemicals:

The applicant plans to use azamethiphos, cypermethrin and deltamethrin. These are all highly toxic chemicals to the aquatic environment according to the European Chemicals Agency. Their utility in fighting lice will be harmful to other crustaceans. The South Bute proposed site is already fished by CFA members as well as a young lobsterman who is not a CFA member. Why will you allow Dawnfresh to be allowed to use these chemicals to deal with a problem they themselves have created (putting tens of thousands of fish together in an enclosed space) if they will impact other marine life and water users who depend on the quality of the water for their lives and livelihoods?

As a facilitator of the Bute Outdoor Swimming Society, I question what the impacts of these chemicals may be on open water swimmers and who is responsible should a person be adversely affected. I am aware that MOWI has undertaken to study this very question but I have no trust in a study that will be done by people who have a huge bias in what the outcome will be. Why is SEPA not doing this study? Whatever the outcome of this study it will set a precedent and all other fish farm proposals will cite it as evidence. It is too important to be left in the hands of a for profit company with its own motives in what the outcome will be.

Lice:

The South Bute application on its own would create a lice problem that does not exist at that site at the moment, but taken in conjunction with the other two Dawnfresh proposed sites at the Cumbraes there would be a lice cloud formed across the entire expanse of the Clyde from south Bute to the mainland. This is not my opinion but the modelling of Dr Tom Scanlon, a hydrodynamicist, university lecturer for 25 years and MD of a fluid modelling company. The video resulting from his study of the Clyde waters and how their movements would disperse lice can be seen at <https://vimeo.com/496948354>. Again, this would be a problem that does not naturally exist but is created directly as a result of Dawnfresh's own action of corralling tens of thousands of fish into one site and then putting multiple sites in close proximity to one another.

Add your comments in the box below. :

The water quality of the general area will be impacted due to faecal and food waste.

The toxic chemicals used will affect other species both at the site and for some distance around as your own study in Shetland in 2018 showed that dispersion can be wider than previously thought. The potential victims of such impacts would include all the fishermen currently fishing at the proposed

South Bute site and in vicinities nearby, the newly installed oysters at Largs Yacht Marina and Fairlie Quay, and the otters that live and feed around Bute, but particularly those near Hawks Neb, photos of which can be seen on the Isle of Bute FB group page.

The lice problem that will be created by this proposed site, exponentially increased by the other two proposed sites, will have a huge impact on the wild salmon and trout populations as has recently been accepted. Does SEPA not have an obligation to protect the salmon as they swim to and from the Endrick Waters SAC? How can these applications even be considered?

The Bute Outdoor Swimming Society FB group page now has approx 500 members, many swimming here on Bute or in other parts of the world, who aspire to come to the beautiful coastal waters of Bute to swim and in the meantime enjoy all the photos the local swimmers post. There have been several swims by the group through the very site of the proposed Dawnfresh South Bute site. It would be a tragedy to close this beautiful section of isolated coastline to use by the people who live on or visit Bute.

Add your comments in the box below. :

The three bath treatment chemicals that have been mentioned in the CAR application - azamethiphos, cypermethrin and deltamethrin.

I did not see Formaldehyde or hydrogen peroxide mentioned in the papers we were allowed to see but they would also be of concern if they are mentioned in other documents.

Faecal waste from a large number of fish over an extended period of time - after all we know what happens to a fish tank , even a goldfish bowl, if not cleaned every few days!

I do not understand why we are being given data to look at from 2018 that has been put into outdated modelling software. I also do not understand why Dawnfresh have been allowed to create the model they have based on an insufficient amount of current gathering days if there were difficulties due to weather, an instrument being dislodged by another water user or a glitch in the equipment, then surely it is up to Dawnfresh to spend the time and money to gather the appropriate amount of data. If I as an individual am applying for planning permission to build a house I am not able to gloss over problem areas or cut corners in making the application; why should a company get to do that when there is so much at stake? I do not understand why Glasgow airport wind data and Inverkip meteorological data is used in the modelling. It may be what is available (though there was Inverkip wind data available, I checked the site they referenced in the application) but any of us living in the area know that the winds and weather we face are completely different to that in either of the other two locations mentioned. My husband has been on the tugs on the Clyde since 1974 and can definitively tell you that! After the ECCLR report chastised SEPA rather rigorously for lack of oversight and SEPA reformed its application standards, why are these applications being allowed to use old, irrelevant data input to outdated modelling systems in their submission?

Add your files and documents below:

No file uploaded

Impact on people who use water environment

6 Tell us about why you think the application will impact on people who use the water environment.

Add your comments in the box below. :

I think that it will cost some people part or all of their livelihood (CFA/other fishermen who use the area/exact site)

I think it will impact the success of the re-introduction of oysters to the area, a project that will improve the water quality rather than negatively impact it as the proposed fish farms would

All three proposed farm sites are directly in the highest use areas for kayaking, sailing and merchant navy activity so anyone involved in any of these activities will be impacted

Wild swimmers would lose use of an entire section of the Bute coastline as would the newly established paddle boarding company on Bute and the round Bute sail would be hampered

It is not just the people who get in or on the water but the people who enjoy being near the coast - everytime I have ever walked along the West Island Way, I have always met both locals and visitors enjoying the scenery - sealife, birdlife, the watersports activities going on close by, the various merchant and military vessels that can be seen. To put a fish farm directly adjacent to the designated path is unthinkable.

Add your comments in the box below. :

As above

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As in question 5, part 3:

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