

## Introduction

1 What is your name?

Name:

Theresa Nelson

2 What is your email address?

Email:

3 What is your interest in this consultation?

Campaign group

Other:

I live on Bute and have visited Cumbrae on various occasions, walking around it, cycling around it, sailing to and around it, and kayaking to and around it. I help facilitate the group Buteiful Coasts on Bute.

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 Cumbrae 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 76 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. A lot of money is being spent to reintroduce oysters to the local area with farms at Largs Yacht Haven and Fairlie Quay Marina. These creatures will filter the water, improving the water quality overall. Why allow this fish farm that will only add faeces and toxic chemicals, to impact this much more worthwhile project.

Lice:

The Cumbrae 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 Wee Cumbrae and South Bute 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 in the area, the newly installed oysters at Largs Yacht Marina and Fairlie Quay, and quite possibly the humans who wade or swim or use the waters around Cumbrae for other water sports. In particular, all the people who visit Largs and its nearby coastline and wade or swim or use the water for other activities, as Dawnfresh's own dispersion modelling shows that the toxic chemicals used in bath treatments will directly impact this coastal area. Also, the Ballochmartin SSSI is very close by. Documents relating to this site in the Register of Scotland describe it as 'The most varied section of coast on Great Cumbrae....intensively surveyed and studied, and the site is of considerable importance for research and the teaching of marine biology.'

A further document states that 'Anyone who proposes to carry out one of the operations listed below must first consult the Nature Conservancy Council (now Nature Scotland).' This application would have Dawnfresh carrying out three of the listed operations: 6 application of pesticides, 7 dumping, spreading or discharge of any materials and 16b changes in coastal fishing practice or fisheries management and seafood or marine life collection, including the use of traps or fish cages. Why are we not able to see what Nature Scotland has to say about this application as part of this consultation?

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?

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 it will cost some people all or a part of their livelihoods - local fishermen, the new oyster farm, local hoteliers/shopkeepers as people become aware of the toxic chemicals being used around the beaches, particularly in Millport and Largs and decide to go somewhere else for their day trip/paddle

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

The proposed fish farm sites are all in the heaviest use areas for kayaking, sailing and merchant navy activity so anyone participating in these activities would be impacted. This could have a knock on effect as sailors want to avoid the cages and their extended anchoring systems and sail to places without these, as kayakers decide to go to a less environmentally degraded area to enjoy their day paddling. My daughter sat on her tug for four days when the two ships broke loose from Hunterston Jetty a few months ago, holding the two vessels in place and she said they would have been sitting on or running into the fish farm if it had been there.

As well, it is a detraction from the scenic beauty of the area so might impact the charter companies running tours of the area.

In addition, I would think that it would negatively impact the quality of the research that takes place related to the Ballochmartin SSSI.

Add your comments in the box below. :

as above

Add your comments in the box below. :

As in question 5, part 3:

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 documents in the box below. :

No file uploaded