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Date: 28 October 2021 at 09:12:15 GMT+11
To: EQCAT@gov.scot
Cc: CB Registry <registry@sepa.org.uk>
Subject: Request to call in decision CAR/L/1178035 - Little Cumbrae Marine Pen Fish Farm, CAR/L/1178037 Cumbrae Marine Pen Fish Farm and CAR/L/1178014 South Bute Marine Pen Fish Farm

Scottish Ministers,
Scottish Government,
Environment and Forestry Directorate,
Environmental Quality Division,
Area 1-D (North),
Victoria Quay,
Edinburgh
EH6 6QQ

By email only, cc SEPA

27th October 2021

Request to call in decision CAR/L/1178035 - Little Cumbrae Marine Pen Fish Farm, CAR/L/1178037 Cumbrae Marine Pen Fish Farm and CAR/L/1178014 South Bute Marine Pen Fish Farm

Dear Ministers,

On behalf of Friends of the Sound of Jura, a coastal community group, I am writing to request that you call in SEPA's decisions to grant CAR licences for discharges of fish farm pesticides, which include azamethiphos, deltamethrin and hydrogen peroxide, from the new fish farms proposed by DawnFresh at Cumbrae (CAR/L/1178037), Little Cumbrae (CAR/L/1178035) and South Bute (CAR/L/1178014), all in the Greater Clyde.

SEPA has issued 21-day notices for all three decisions.

Sea lice are a major problem in fish farms, which regularly treat their fish with pesticides to remove them. All fish farm pesticides are dumped into the sea after use.

SEPA regulates these discharges on the basis that the compounds will break down and be dispersed by currents over several days. For deltamethrin, cypermethrin and azamethiphos, time-limited Environmental Quantity Standards have been set by SEPA, to reduce but not eliminate harm to the environment. This is on the assumption that these discharges will happen infrequently and that discharges from other farms will not have a cumulative impact.

SEPA has set no EQS for hydrogen peroxide and there are no limits on the quantities that may be discharged. A large farm may discharge 120 tonnes of hydrogen peroxide each time it

treats its pens. The environmental impacts of doing so have not been fully assessed or modelled for these farms.

Many fish farms have severe problems with sea lice, so chemical treatments and discharges can be frequent. As an example, attached below are the sea lice counts from DawnFresh's farms in Loch Etive, from July to September this year.

The Scottish Government's intervention level is 6 adult female lice per fish. In mid-September, Port Na Mine (Etive 3) had an average of 22 adult female lice per fish. This is a fish welfare disaster that has been going on for months.

A farm operator's track record should have some bearing on the issuing of additional CAR licences. DawnFresh claims that it will always be able to control lice numbers by using cleaner fish, physical treatments and limited pesticide treatments, but its performance in Loch Etive shows that this is not true. Between July 2020 and September 2021, DawnFresh has treated at least one of its three main farms in Loch Etive with azamethiphos in each month for 15 straight months, and the lice counts show that the fish are still suffering horribly from sea lice and the effects of physical and chemical treatments.

SEPA did not set its environmental standards on the basis that discharges could be dumped into any waterbody every month, for 15 months.

These substances are highly toxic to other marine life, including crustaceans caught by local fishermen. Their jobs depend on these discharges not happening.

Some fish farms have 12 or 14 cages. To treat a whole farm can take two weeks, as often only one cage can be treated per day, so a new plume of pesticide is dumped into the sea every day over that period.

Part 15 (1)(c) of the Water Environment (Controlled Activities) Regulations 2011 states that before determining an application, SEPA must assess the impact of the controlled activity on the interests of other users of the water environment.

Clearly this applies to fishermen. It also applies to swimmers. Year-round sea swimming (wild swimming) has grown greatly in popularity in recent years. Many visitors to Scotland come here to enjoy swimming in the sea, bringing valuable economic benefits to coastal communities. Many residents also enjoy sea swimming for its health and mental wellbeing benefits.

However, SEPA's 21 day notice letters for the DawnFresh Clyde farm proposals say that, 'the potential for human health impacts arising from azamethiphos, deltamethrin or hydrogen peroxide releases from fish farms is not considered as part of SEPA's determination under CAR.' (Quote from the appendix of the South Bute 21-day letter).

SEPA has confirmed that it does not know and has not assessed the health implications for swimmers of repeatedly being immersed in, or ingesting seawater containing any of the fish farm bath chemicals. In contrast to the 21-day letter quoted above, SEPA also confirms that this is a matter for the agency, the Local Authority's Environmental Health Department and NHS Highland to assess.

In Scotland there are no restrictions on where people may swim and there is no obligation on fish farm operators to warn of pesticide discharges from farms or well boats.

Fish farm workers must wear PPE when handling these chemicals and they must have regular blood tests if they handle azamethiphos, in case of accidental exposure. On land, repeated exposure to organophosphates such as azamethiphos is known to cause damage to the human nervous system. This is why organophosphate sheep dips were banned. Swimmers in Scotland's coastal communities are quite reasonably concerned about repeated exposure to discharged fish farm bath chemicals.

A tourism business close to the North Kilbrannan farm proposal has made a formal complaint to SEPA about its failure to assess this risk before granting the CAR licence for that proposed farm.

Under these circumstances it is unsafe for SEPA to grant any further CAR licences, until better information on the health impacts of bath pesticides is available. It is also unsafe to assume that regularly discharging potent pesticides such as azamethiphos from all the Clyde's fish farms (16 at present with 6 new farms proposed) will not have a cumulative impact on the crustaceans on which many local fishing jobs depend. This is in addition to the impact of the in-feed pesticide emamectin benzoate, which is still being discharged by all the Clyde's existing farms, despite a review of its EQS being commissioned several years ago.

Please call in these CAR licensing decisions.

We also urge you to commission an independent review of the effects of repeated exposure of swimmers to fish farm chemicals.

Yours faithfully

John Aitchison

Chairman
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Friends of the Sound of Jura is a Scottish Charitable Incorporated Organisation: SC049740