

26 October 2021

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

Dear Sirs

CALL-IN REQUEST - SEPA CAR LICENCE DETERMINATIONS

- **CAR/L/1178014 Dawnfresh South Bute fish farm**
- **CAR/L/1178035 Dawnfresh Little Cumbrae fish farm**
- **CAR/L/1178037 Dawnfresh Great Cumbrae fish farm**

The determinations by SEPA of these three SEPA CAR licence applications have now been made available to those who registered their objection to the granting of CAR licences with the facility for once again objecting to these proposals.

On behalf of SCFF there were comprehensive objections raised to all three sites, which I assume will be forwarded to Scottish Ministers.

Our main thrust for these further objections:

- Cumulative impacts of waste on inshore waters in the Clyde. These areas are widely used by other marine users as well as creel fishermen. To treat each of these applications as stand-alone proposals is frankly ridiculous. The cumulative impacts will be greater, and no modelling has been done of all three sites together.
- Modelling is totally inadequate. Intensive farming with food, faeces, and chemical waste being literally dumped in surrounding waters we already know affects shellfish life cycles. Recent independent research and modelling of chemical dispersion from the Mowi proposed North Kilbrannan site, illustrates the much further spread of chemicals than the applicant company had illustrated in its supporting data.
- The increasing threat of accumulation of sealice in these farms and surrounding waters will affect, and potentially destroy wild salmon migrations, particularly smolt moving out to sea. In addition, these areas are the main routes for returning adult wild salmon to fresh water resources via the Clyde, for example Endrick Water SAC.
- Tidal movements in this area of the Clyde around the islands are important features, and dispersal of waste from these farms, high in nitrogen, phosphorus and organic carbon will pose potential risks of eutrophication, HABs etc which will affect life cycles of shellfish, swimmers, and even oyster growth in the newly established oyster regeneration scheme.
- All the time arguments are being out forward about the need for this industry to move off shore in the hope that damage to ecosystems will be less, yet here SEPA's determinations for these 3 farms are in sheltered waters.

What appalled and saddened SCFF, in equal measure, is that there is no mention of previous democratic decision making in North Ayrshire Council, Argyll and Bute Council and

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Community Councils around the Clyde. Are aquaculture farm operators beyond democratic decision making? Does SEPA and the Scottish Government take no notice whatsoever of community wishes, and other water users' wishes? Is the Scottish Government attempting to deny the rights of its citizens to use the democratic decision-making process? If the above is true, then the Scottish Government through Marine Scotland, and SEPA, needs to tell their public in Scotland, especially coastal communities and islanders, in standards, that the rules of Scottish Democracy are now put aside, defunct, and obsolete in the face of corporate business demand, mostly multinational fish farmers in our inshore waters, making short term profit at the expense of long-term compromise for ecosystems in Scottish Inshore waters. The wishes of islanders and coastal communities, especially in the heavily populated Clyde Region are told their opinions, research, businesses are of little or no value: that includes small creel fishers, sea anglers, wild salmon fishermen, cold water swimmers, tourists in their kayaks or yachts that must all be subservient. The Islands (Scotland) Act 2018 was granted Royal Assent in **July 2018**. The Act introduces measures to support and help meet the unique needs of Scotland's islands now and in the future. It also seeks to **help create the right environment for sustainable growth and empowered communities. That has to include the Well-Being of its wider population which uses the Clyde for relaxation and well-being, in itself a highly valued economic incentive.**

Finally, it is worth noting **again** that the now not so recent ECCLR Committee report of the Scottish Parliament on the environmental effect of fish farming confirmed that: **'Scotland's public bodies have a statutory duty to protect biodiversity and this must be to the fore when considering the expansion of the sector**, under the Nature Conservation (Scotland) Act 2004'. There is no evidence in these SEPA determinations that true account has been taken of this laudable objective.

SCFF wishes to register a strong objection and stand against these applications. The choice between short-term profit for a few fish farmers or a long-term positive strategy for improving and sustaining Scottish marine waters, local fisheries, sustainable communities and added value shellfish products. With climate change, a disturbing feature now a top priority, the enormous carbon footprints of raising salmon and sea trout in fish farms needs to be considered. This includes food, (soya, and fishmeal from around the world), and the unsustainable international marketing of the product.

On behalf of SCFF, I request here that Government Ministers call in these determinations by SEPA and that further development of this industry is halted whilst a more coherent approach for the Clyde Sea is established with the backing of all concerned including those communities who have already registered their views.

Yours sincerely

Dr Sally Campbell
Marine Scientist, Board of SCFF

