

Dr James Merryweather

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Sent to:	Cllr. Audrey Sinclair Cllr. Drew Millar Cllr. Hamish Fraser Cllr. John Gordon Cllr. Ian Renwick Cllr. Thomas Prag Dave Thompson MSP Jean Urquhart MSP Colin Wishart (planning) Alex Turner (SNH) Ian Ross (SNH)
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Enclosed: Scottish Marine Environment Protection Discussion Document.

Dear [REDACTED],

**Salmon Aquaculture in Scotland:
Failure of Environmental Impact Assessment in the Highland Planning Process**

The procedure known as Environmental Impact Assessment (EIA) is a fundamental aspect of Environment Protection in the Planning Process required for any major development. EIA is a legal requirement for and a vital constraint on developments that have the potential to harm the natural, scenic and cultural environment.

Salmon aquaculture, *as currently conducted using net-cages*, constitutes a significant pollution threat in Scottish Sea Lochs that is not being adequately mitigated for due to improper implementation of EIA procedure.

EIA guidelines for proposed fish farms are clearly defined,¹ yet are regularly – by intention, indolence or incompetence – being flouted by aquaculture planning applicants. Inadequate assessment of the environmental impacts of potentially polluting development means, at best, sub-optimal protection for the environment. In aquaculture terms, this means willfully ignoring the ecological consequences of chronic marine pollution.

Deficiencies in aquaculture applicants' EIAs are not being recognised by the planning committees that approve or refuse them because they do not receive the information/advice that would, if they were aware of it, enable them to appreciate quite how bad EIAs submitted by aquaculture companies truly are.

Comment letters contributed by members of the public in consultations that convincingly (with evidence) expose these deficiencies are not being heeded by the planners who defer to less critical, 'dilute' advice provided by statutory consultees.²

Highland Councillors and Planning Applications Committee members should be aware that aquaculture applicants are routinely presenting lamentably badly researched and reported EIAs which are not being adequately challenged by statutory consultees (whose job it is to advise the

¹ SNH EIA Guidance Manual (2013). www.snh.gov.uk/docs/A1198363.pdf

² For instance Report PLN/086/14 (16 December 2014; ePlanning document no. 760332) of the North Planning Applications Committee, when accepting planning application 14/01595/FUL from Hjaltland Seafarms Ltd. for a new salmon farm in Loch Snizort, Isle of Skye.

planning officers who in turn advise planning committees) so that shoddily prepared and badly presented applications are being shunted through the planning process unhindered by rational appraisal and legal requirements.

This is not a matter of salmon aquaculture's environmental impact itself, which is, of course, well understood and no trivial matter. This is about failure of the advice chain that informs the Highland Council's decision makers, leading to improper implementation of the planning process, which in turn leads to abuse of the Highland environment being permitted.

I request an interview during which I can elaborate on this discussion.

Yours sincerely,

James Merryweather.