

Roger Cottis



ePlanning Centre,
The Highland Council,
Glenurquhart Road,
Inverness,
IV3 5NX.

22nd September 2015.

Dear Mr Wishart,

Marine Fish Farm Application
Loch Eishort – 2, Tarskavaig, Isle of Skye
Planning Application - 14/02577/FUL.
Second Public Consultation

Objection comments.

A fundamental error is exposed with the ROV images. There are no GPS coordinates embedded in the footage; as a consequence it is impossible to determine where each section is located, therefore certain elements cannot be cross checked, which is unacceptable. Significantly the Hjaltland report seemingly dismisses the UK Biodiversity Action Plan (BAP) habitat, SS.SMu.CFiMu.SpMmeg [Circalittoral Muds with Sea Pens & other Megafauna] (JNCC) as “soft sandy mud”, which may imply that it is dispensable or unimportant; I would disagree, it is important for fish species and *Nephrops norvegicus* an important commercial species for low impact sustainable creel fishing. However, the quality of the footage enables a clearer interpretation than the original attempt in the first public consultation and illustrates some of the species and habitat, which will inevitably die out over a considerable area.

As with all significant habitats and species any survey protocol should encompass seasonal changes, so single passes of three transects undertaken once, certainly does not give a data set suitable for a meaningful analytical assessment.

Whilst the area of habitat loss due to sedimentation pollution from 800/900 tonnes of salmon farm effluent per year can be reasonably predicted, nowhere is the dispersal of dissolved nutrients from that effluent considered in the context of the Oyster *Ostrea edulis* beds, a Priority Marine Feature and UK Biodiversity Action Plan (BAP) habitats. LS.LMp.LSgr [Sea Grass Beds (*Zostera marina*)] and SS.SMp.Mrl [Maerl Beds (*Phymatolithon calcareum*)] are all important considerations, which are adjacent to the proposed site and highly vulnerable. The BAP habitats are vital for multiple species breeding, which highlights the findings of WWF's *Blue Living Planet Report 2015* in conjunction with the Zoological Society of London (*WWF-ZSL 2015*). This shows for marine populations, a decline of 49 percent between 1970 and 2012. Significantly seagrass meadows are highlighted in the report. ZSL data indicated a 29 percent loss of the habitat, siting pollution as a major factor leading to a dramatic decline in fish species of >70 percent between 1970 and 2010. Open-net fish farming is an insidious, out of sight, out of mind contributor to these data, which need not be the case. The only truly sustainable way forward is to convert open-net salmon farming to closed containment, which eliminates all of the ecological concerns. (See Annex 1).

On 15th August 2015 Grieg Seafood, in a Press & Journal Fishing article, announced funding for a science based study to restore sea trout fishing to its glory days for all of Skye's rivers and estuaries. Their regional director Sigurd Petersen said "*Grieg Seafood and Skye Fisheries Trust share a joint vision, to ensure the environment of Skye is optimal and sustainable for both wild and farmed salmon and trout and we are pleased to have been able to contribute to this valuable scientific study*". It therefore follows that to apply for two massive salmon farms in Loch Eishort, where wild salmonids have declined since the original introduction of several fish farms in the South Skye lochs is a cynical proposition; in the face of overwhelming evidence that sea lice, proliferated by intensive open-net fish farming are the causal effect of salmonid decline. Here the Rio Convention "*Precautionary Principle*" should be implemented.

Therefore, I object to this application in the strongest terms.

Yours sincerely

Roger Cottis.

Annex 1.

CLOSED-CONTAINMENT AQUACULTURE

*The alternative that eliminates all
objections to farming salmon in nets*

COMPARISON

<i>Big Nets</i>	<div>✓ advantageous</div> <div>✗ disadvantageous</div> <div>= equally good or bad</div>	<i>Big Tanks</i>
NET-CAGES (PENS)		CLOSED CONTAINMENT
Full of holes, open to the sea ✗		No holes, fully contained ✓
Waste disposed of in the sea ✗		Waste contained ✓
Marine environment polluter ✗		Marine environment non-polluter ✓
Waste treatment non-existent, therefore completely free ✗		Waste treatment costs ✓ money, but see next two:
Waste is thrown away ✗		Waste can be reused ✓
Waste is not recycled ✗		Waste can be recycled ✓
Pests & Diseases affect farmed fishes ✗		Pests & Diseases almost eliminated ✓
Pests & Disease affect wild fishes ✗		Pests & Diseases do not affect wild fishes ✓
Pesticides & Medicines required ✗		Pesticides & Medicines much reduced ✓
Pesticides & Medicines pollute ✗		Pesticides & Medicines do not pollute ✓
Fishes escape ✗		Fishes do not escape ✓
Genetic exchange with wild fishes ✗		No genetic exchange with wild fishes ✓
Invasion by carnivorous mammals and birds ✗		Carnivorous mammals and birds excluded ✓
Carnivorous mammals and birds 'culled' ✗		Carnivorous mammals and birds no culling ✓
Cages damaged or destroyed by rough seas ✗		Cages not damaged by rough seas ✓
Creates a few new jobs =		Creates a few new jobs =
Contribution to local economy? =		Contribution to local economy? =
Fish feed contains wild caught fish as meal =		Fish feed contains wild caught fish as meal =