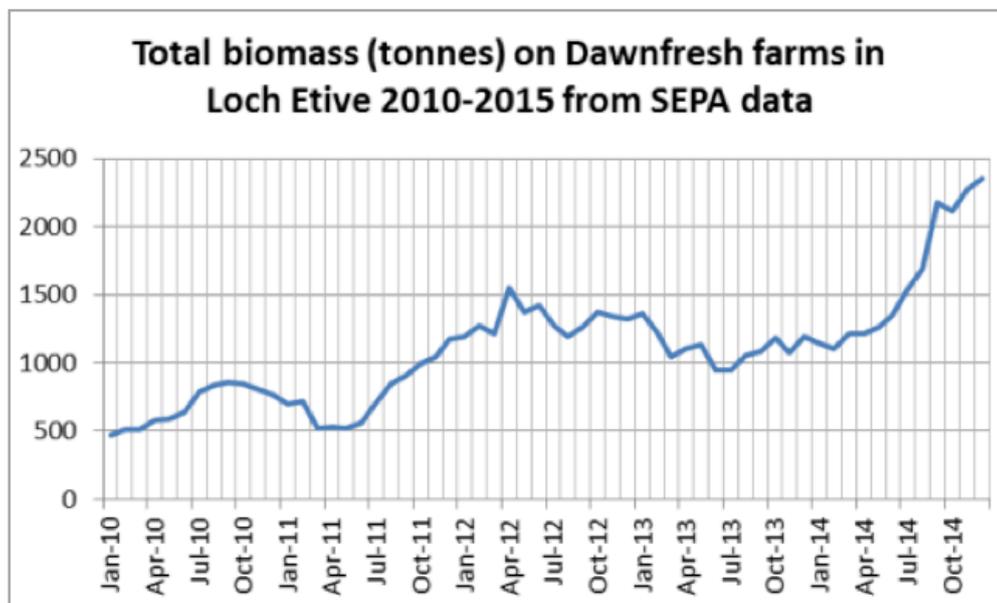


GROUNDS FOR OBJECTIONS

1. Loch Etive has reached its limit – there are enough farmed fish already

There has been no proper consideration of the cumulative impact of the massive expansion across Loch Etive since 2009/10, which has seen a 500% increase in the tonnage of farmed fish held in Dawnfresh's farms.



The loch has reached its limit in terms of what it can support and there should be no new biomass.

2. More sea-lice and the potential for fish disease threatening wild fish in Loch Etive

Dawnfresh has made repeated claims that sea lice are not an issue on Loch Etive, yet at both Etive 4 and Etive 6 last autumn sea lice numbers went over the Scottish aquaculture industry's threshold for treatment which is designed to protect wild salmon and sea-trout from lethal infestation of parasitic sea lice coming from fish farms.

The farms are being treated again this summer and the apparent emergence of sea lice as a problem on Loch Etive is linked with the increasing biomass of farmed fish held across the loch. This application will just make matters worse.

Salmon farmers right across the west coast – following the recommendation of Marine Scotland Science – employ regular loch-wide following to reduce sea lice numbers and, indeed, other fish diseases, the impact of which on wild fish we simply do not understand. The application at Etive 4 makes no mention of this.

Within Loch Etive, sea-trout numbers have dropped massively over recent years. The impact of the huge increase in rainbow-trout farming on Loch Etive will only make matter worse for wild sea trout population. In addition, the reputation of the River Awe as a wild salmon fishery – and the tourists it brings to Loch Etive – is at risk not only from the continuing escapes of farmed fish from Loch Etive, but specifically from Etive 4 itself. Over 2,000 farmed fish were lost from Etive 4 this year alone.

The Council is responsible for protecting the wild fish on Loch Etive and should now refuse further planning permissions.

3. Yet more industrialisation of the loch

The presence of a large, automated, permanently-moored feed barge is a step change for this location.

The application documents downplay the impact that barge will have, but the example of the permanently-moored feed barge at Etive 6 makes it clear the significant impact these feed barges have upon the appearance of fish farms.



The presence of the feed barge with automated equipment and feed pipes running over the surface of the loch will give a very industrialised feel to this fish farm and to Airds Bay as a whole.

4. Automated feed barges mean less local jobs

Dawnfresh are not promising more jobs with this application. In fact, the use of automated feed barges has brought no new employment on other Scottish fish farms.

Across the fish farming industry, automation is designed to reduce the need for staff.

5 More pollution of the Etive 4 site and the whole loch

The increase in the proposed biomass of fish to be held at Etive 4 from 966 to 1545 tonnes will bring with it a proportional increase in the pollution of the water column and benthic environment.

The terrible track record of benthic self-monitoring reports submitted to SEPA relating to Etive 4 already means that, at 966 tonnes, SEPA believes the site is approaching its assimilative capacity for the loch to cope with the waste from that farm.

Dawnfresh is repositioning the cages to deal with the pollution that it has already caused. Inevitably, with more biomass and repositioned cages, it will pollute a greater area of the loch bed.

6. Landscape

The various plans and photomontages supplied in the application downplay the impact of the two new cages and particularly the tall and imposing feed barge. They are long-range, poor quality and fuzzy. They even use old projections of what Etive 6 would look like, not what it actually looks like, now it has been built.



The application has absolutely no photographs of the proposed permanently-moored feed barge in Airds Bay, but the feed barge already in place at Etive 6 is imposing and is a significant feature on the loch. The suggestion that two of these feed barges should be positioned on the loch, within close proximity to each other, represents a significant industrialisation on Loch Etive.

7. The ICZM Plan

The Loch Etive community was widely consulted in drawing up the Loch Etive Integrated Coastal Zone Management (ICZM) plan only a few years ago.

The proposed expansion at Etive 4 is in Policy Zone D of that plan and that plan is clear that there is no room within Policy Zone D for any further aquaculture development. The new farm at Etive 6, granted permission in 2013, used up any spare capacity within Policy Zone D for rationalisation and consolidation of existing aquaculture sites and this application makes no attempt to further rationalise or consolidate activities within Policy Zone D.

If this is granted, the Loch Etive community will lose all trust in the Council and its plans, as they will have proved to be worthless and the consultation a sham. On that basis alone, this application should be refused.

8. Noise

The proposed expansion at Etive 4 brings with it an automated feed barge which be moored permanently and will blow pelleted feed down floating pipes to the fish-cages at Etive 4.

Reports from elsewhere on the west coast of Scotland on the noise generated by automated feed barges suggest that it is intrusive and can be extremely annoying. The constant rattle of pellets being blown down the feed pipes and the background hum of diesel generators can be extremely intrusive particularly on calm days with sound travelling very easily over water.

There is no assessment of the likely impact on Taynuilt and other communities in direct line of sight of Etive 4.

9. Navigation

The proposed new Etive 4 will cover a significantly larger area of sea loch than the existing Etive 4. When considered with the new farm at Etive 6, and proposals to expand that farm further still, yet more of the loch is being removed from the public right to navigate. Importantly, the ability of kayaks and other small vessels to approach Taynuilt along the west side of Airds Bay will be impaired by the realignment.

The application makes no comments at all upon the impacts on navigation.

10. Missing information – the application is incomplete

A great deal of the information required by statutory bodies such as Scottish Natural Heritage, the Scottish Environment Protection Agency, Marine Scotland Science and the Argyll and Bute Council itself (as part of the earlier screening and scoping decision) does not appear as part of the application.

Nor is there any assessment of the next application in the pipeline – 2 more cages to be added to Etive 6 – that the Council already knows about.

The public has a legal right to see everything before an application can be properly considered.

11. Etive 4 already breaches its planning permission

When Etive 4 was first granted permission in 2008, the environmental impact assessment and Environmental Statement made it quite clear that Etive 4 was only going to be used in strict rotation with Etive 3, the farm at Port Na Mine.

Since then Etive 4 and Etive 3 have been run more or less continuously and at the same time as each other. Planning conditions attached to the 2008 permission have not been enforced by the Council, which regards this as only a 'technical breach'.



What is now proposed is a completely different fish-farm compared to what was granted permission in 2008 after the public consultation. The new proposed Etive 4 should now be subject to a completely new 'whole-farm' environmental impact assessment, involving public consultation with the entire Etive community.