



HUGE NEW INDUSTRIAL –SCALE FISH FARM PLANNED FOR LOCH ETIVE

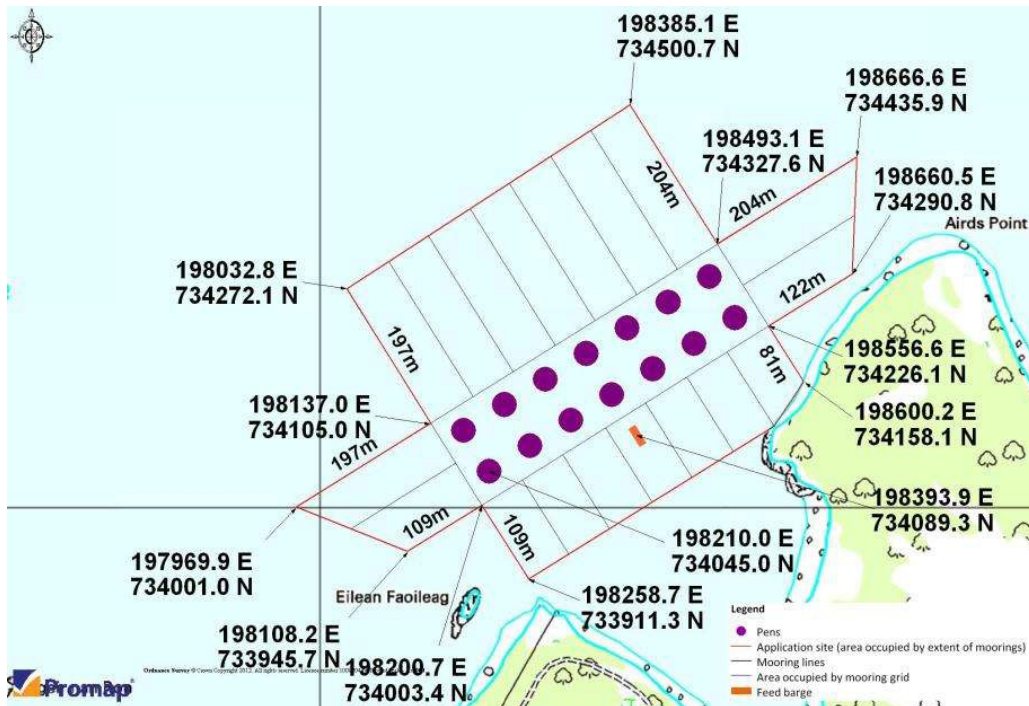
NB this requires your urgent attention as objections must be lodged with the Argyll and Bute Council by 27th December 2012

This application from Dawnfresh for an industrial-scale fish farm on Loch Etive threatens to spoil the landscape and damage the wild unspoilt nature of Loch Etive. It will be permanently lit at night. It will physically bar others using the loch from a huge area of the loch surface, including removing safe easy access to the Sailean Ruadh inlet for the anchoring and mooring of boats. It will threaten wild fish, seals and otters. It risks disturbing valuable seabird breeding sites on nearby isles. It risks even greater escapes of farmed rainbow trout than Etive has already suffered over the years from Dawnfresh's five other farm sites on Etive. It will cause pollution, create boat and road traffic and will smother seabed habitats that Scottish Natural Heritage (SNH) regards as 'priority habitat' for conservation with organic wastes including uneaten food and faeces.

What is Dawnfresh seeking to do ?

Dawnfresh - the rainbow trout company owned by Alistair Salvesen, of the Salvesen shipping family - is seeking to build a massive and permanent floating 14-cage fish farm at Sailean Ruadh just down the loch from their existing farm at Airds Bay.

This new farm (shown below) will be the biggest farm on the loch by some margin - containing 2500 tonnes of rainbow trout in 14 round cages covering a huge area of the loch surface and with a permanently moored 'feed barge' on site. The barge will house a generator on-board and feed pipes will run from the barge, down which food pellets will rattle their noisy way to the cages.



The photo above shows the design of feed barge proposed, as seen at another site.

The surface 'footprint' of the proposed fish farm and its 14 cages is given by Dawnfresh as 11,141 square meters. The mooring grid will occupy just under five times that area and the full extent of the moorings is a staggering 21.747 hectares.

This is not easy to imagine, but the surface of the loch occupied by the proposed fish farm is the same size as just short of three full size football pitches. With the mooring grid that increases to about 12 and a half football pitches.

The full extent of the moorings as given in the Environmental Statement would encompass an incredible 54 football pitches.

The threat to Loch Etive

If this fish farm is given planning permission by the Argyll and Bute Council, it will entirely change the character of the loch, not just at Airds Point, but for the whole loch.

The small-scale, environmentally-benign mussel farming of old will go (with less chance of its coming back despite the current efforts to rid Etive of the problem species of thin-shelled mussels, *Mytilus trossulus*) as the proposed fish farm will displace the old Muckairn Mussels site.

The proposed fish farm is industrial-scale rainbow trout farming.

The farm will produce nearly 4200 tonnes of fish over a two-year growing cycle. It will require deliveries of 200 tonnes of feed to be delivered per week when at maximum capacity. It will be lit at night by a white light on top of the feed barge and lights at the corners of the huge cage grid.

The basic principle of this size of farm is, in essence, no different to intensive food production on land for chickens or pigs.

The proposed fish farm is out of kilter with Etive's tourist economy. The remaining wild nature of the loch will be damaged. Sea anglers will go elsewhere. The very wild feel that brought many residents to Loch Etive will be permanently damaged.

Once planning permission is given for a fish farm, it cannot be revoked even by the Argyll and Bute Council or for that matter Scottish Ministers. It is permanent and irrevocable.

Escapes of farmed fish

Dawnfresh and its predecessors have had a very poor record of escapes of rainbow trout from their farms both on Loch Etive and from the freshwater operations on Loch Awe. Despite claims when Dawnfresh bought into Loch Etive that 'things will be different now', escapes have continued into 2012 with over 3,000 fish escaping in May from their Braevallich farm as a result of a combination of equipment failure and human error.

Both the Loch Awe Improvement Association and the fishery proprietors on the River Awe have complained about the impact of mass escapes of farmed rainbow trout into Loch Awe and Loch Etive for many years. Even though rainbow trout do not interbreed with wild fish, they are known to eat wild smolts (juvenile salmon and sea-trout) and to compete for space with wild fish. Their presence dissuades anglers from coming to fish on the River Awe for salmon and Loch Awe for its famed wild brown trout.

This new farm holds out the prospects of even larger escapes of fish a very short distance from the River Awe and extremely close to other small wild salmonid waters.

The impact on wild fish

Even though Loch Etive has not traditionally had a problem with sea lice, sea lice across the whole of the west coast are becoming an increasing problem for fish farmers, with the lice themselves apparently able to go through more life-cycles per year than previously and becoming resistant to the available treatments. Both Atlantic salmon and rainbow trout can be infested with sea lice.

The proposed farm is nearer the open sea than the existing farms and as such may be more prone to sea lice. Sea lice epizootics (epidemics) cannot be ruled out, but the size of the farm and its location mean that its licence issued by SEPA (Scottish Environment Protection Agency) would not allow Dawnfresh to use chemically-treated feed to treat all its farmed fish for sea lice at once.

Any resulting sea lice problem on the fish farm, with millions of juvenile lice potentially being produced from the fish farm, would be a disaster for any wild salmonid (salmon and sea trout) smolts heading to sea from the River Awe for the first time.

Threats to wildlife

The shoreline of Loch Etive right next to the farm site is known for its otters which use and inhabit the shoreline of the Loch Etive Woods Special Area for Conservation (SAC), designated under the strictest European nature conservation law. Dawnfresh's consultants state that otters have in the past been entrapped in Etive trout farm anti-predator nets (along with wild fish, birds and seals). It is also very well known that otters are sensitive to disturbance.

It is utterly inappropriate for this farm to be sited so close to one of the UK's most protected nature conservation sites.

The isle of Eilean Faoileag, at the mouth of Sailean Ruadh supports important breeding seabirds. Since 1991, common gull, black-headed gull, common tern, oystercatcher, eider, mute swan, arctic tern and greater black backed gull have all bred on Eilean Faoileag.

Ospreys are believed to nest in the hills behind Muckairn and feed in the bays along the coast near Sailean Ruadh. Even Dawnfresh recognise that Eilean Faoileag is a 'very high value feature for wildfowl and marine birds in a local context'. Yet the proposed fish farm, with its feed barge, feed pipes, nets and acoustic seal scarers, will be less than 150 metres away.

Seals

Although Dawnfresh will argue that they can control seal attacks on their fish farms without the need for lethal methods of control - by using tensioned nets and seal scarers that frighten the seals away using very loud noise - Dawnfresh already has a licence to kill seals on Loch Etive and reported to Scottish Government that, as a company, it killed 6 seals in 2011. Its only marine sites are in Loch Etive.

In 2009, after escapes of farmed fish then, Dawnfresh reported seal damage to its nets at Etive 3 and 4 (Ardchattan and Airds Bay) and attributed this to seals. In 2012 Dawnfresh reported huge mortalities in their stock in Etive 4 due to seal damage.

It appears to be an inevitable consequence of fish farming in Loch Etive that Etive seals will be attracted to caged fish, will attack the nets, damage them and allow the fish to escape. In this new farm goes ahead, it is likely that more seals may need shooting if the fish farmers are to protect stock held in the 14 proposed cages.

Seabed habitat

Scottish Natural Heritage has identified the habitat on the sea-bed under the proposed fish farm as a 'priority habitat' for Scottish nature conservation under the national Biodiversity Action Plan.

Despite this, the proposed fish farm will smother the bed in organic waste in what is casually described as the Allowable Zone of Effect. Dawnfresh's consultants predict an area of degraded seabed of 76,610 square metres (or 19 football pitches) adding to the 69,623 square meters that Dawnfresh has already degraded under its existing 5 other fish farm sites in Loch Etive.

Damage to the landscape

The feed barge (27 metres long and 10 metres wide) be permanently on site and will be lit up at night. The site will also be lit by navigation lights.

The photomontages below (taken from the Dawnfresh Environmental Statement) of the proposed farm (before and after) show the size and extent of the farm and the impact it will have on any view of that part of Loch Etive.



Navigation

As can be seen from the photomontages taken from the Dawnfresh consultant's Environmental Statement, the positioning of the fish farm will effectively block the Sailean Ruadh inlet (top of photo) for all but the most confident or professional sailors and boaters.

The dangers presented by hidden mooring ropes and the cages themselves will make access to one of the very few safe anchorages on Loch Etive identified by boating groups very hazardous if not

impossible. There is also a permanent mooring in Sailean Ruadh which will be very difficult indeed to use, especially in poorer weather when it is most needed.

The proposed fish farm will bar and exclude all other loch users from sailing, fishing or boating in its immediate footprint. It will effectively also add the Sailean Ruadh inlet to those areas of the loch surface that Dawnfresh has already effectively made 'off limits' at its other five farms on Loch Etive.

This would seem to be a permanent, unreasonable and unlawful interference in the public right to navigate at sea, which has existed in law since time immemorial, in this case, for the private commercial benefit of a single company Dawnfresh.

What are we asking you to do ?

If you want to protect Loch Etive from this massive fish farm development, you must make your voice heard soon.

The Argyll and Bute Council has now received the Dawnfresh Environmental Statement and the proposed fish farm development is now out for public consultation **until 27th December 2012,** although we are told by Richard Kerr of the Argyll and Bute Council that he will consider information received after that date if possible.

The application can be found at:

<http://publicaccess.argyll-bute.gov.uk/publicaccess/applicationDetails.do?activeTab=summary&keyVal=MAYLKBCH0A900>

Hit the 'Make a Comment' button or email the Council.

Mr Richard Kerr is dealing with the application for the Council. Richard.Kerr@argyll-bute.gov.uk

Please be as helpful as you can be to the Council and confine your comments to relevant planning matters on Loch Etive.

Keep or ask to be sent a copy of your objection.

If at all possible, make your objections by 27th December 2012.