

## Email chain 1

**From:** <REDACTED> <<REDACTED>@gov.scot>  
**Sent:** Thursday, November 2, 2023 10:07 AM  
**To:** <REDACTED> <<REDACTED>@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>  
**Subject:** FW: Loch Long Salmon - Site Introduction

Morning – sorry, I forgot to circulate the info I received from <REDACTED>. See below for the limited information he has provided on the proposed site in Loch Carron.

**From:** <REDACTED> **On Behalf Of** MS FFPlanning  
**Sent:** Wednesday, October 25, 2023 3:46 PM  
**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>; MS FFPlanning <MS.FFPlanning@gov.scot>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Good afternoon <REDACTED>,

At the moment we could offer the following times:  
Thursday 2<sup>nd</sup> November 11:00 – 12:00  
Thursday 9<sup>th</sup> November 10:00 – 10:30  
Friday 10<sup>th</sup> November 13:00 – 14:00

Please let me know if any of the above options suit you and I can then send a Teams link.

Kind regards,  
<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Monday, October 23, 2023 10:13 AM  
**To:** MS FFPlanning <MS.FFPlanning@gov.scot>  
**Subject:** FW: Loch Long Salmon - Site Introduction

Morning <REDACTED>,

Just following up on this – have you been able to find a suitable slot to discuss with someone?

Thanks,

<REDACTED>  
<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Wednesday, October 11, 2023 1:08 PM  
**To:** MS.FFPlanning@gov.scot  
**Subject:** RE: Loch Long Salmon - Site Introduction

Afternoon <REDACTED>,

Thanks for getting back to me – it would be appreciated if you could look at availability beyond 2 weeks as it would be great to get some feedback on the general location. The location we are looking at is on the south shore of Loch Carron, about 1-3km east of Stromeferry (there is a Bakkafröst site on the north shore from this location). As with Beinn Reithe and Lurignish, we would be looking to deploy semi-closed or closed-containment at sea technology but there are a number of providers that we could look at for this. Regarding the maximum biomass and number/geometry of pens, this is still very open at this stage and I'd be looking to collate feedback from yourselves (and other stakeholders) to determine what is most suitable for the location.

Hope this helps,

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot> **On Behalf Of** [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)

**Sent:** Wednesday, October 11, 2023 12:09 PM

**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>; [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Unfortunately, due to existing staff commitments it is unlikely that we will be in position to offer a meeting over the next 2 weeks. I'd be happy to look at future availability, however if you were able to confirm a few details about the proposal we could provide some initial written feedback.

If you could provide:

Site position (rough estimate would be helpful even if exact location not available)

Proposed maximum biomass

Scale of site (number of pens)

Will this development be similar to Beinn Reithe and Lurignish?

Kind regards,

<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>

**Sent:** Thursday, October 5, 2023 5:15 PM

**To:** MS FFPlanning <[MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)>

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thanks for your email – no problem re. confusion around the Lurignish development. The location in the Highland region that I would like to discuss is within inner Loch Carron.

Thanks,

<REDACTED>

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <REDACTED>@gov.scot> **On Behalf Of** [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)

**Sent:** Thursday, October 5, 2023 5:10 PM

**To:** <REDACTED> <REDACTED>@simplybluegroup.com>; [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thanks for getting back to me. I have passed your details on to my policy colleagues for them to follow up separately.

Apologies for any confusion my previous email may have caused – I misread it and thought we were discussing the Lurignish development.

Ahead of any potential meeting about a new development in the Highland region, it would be useful if you could provide us with a proposed location so that we can review and consider the advice that would be most useful to Loch Long Salmon.

Kind regards,  
<REDACTED>

**From:** <REDACTED> <REDACTED>@simplybluegroup.com>

**Sent:** Tuesday, October 3, 2023 10:38 AM

**To:** MS FFPlanning <[MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)>

**Cc:** <REDACTED> <REDACTED>@gov.scot>

**Subject:** RE: Loch Long Salmon - Site Introduction

Morning <REDACTED>,

I would like to discuss the how the Marine Directorate view the suitability of the proposed location for siting a new farm, looking at the capacity of the loch itself to support additional biomass, the proximity to existing farms within the area and the current benthic condition of the loch. Feedback regarding and show-stoppers or advice that can be offered would be greatly appreciated.

Kind regards,

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <REDACTED>@gov.scot> **On Behalf Of** [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)

**Sent:** Monday, October 2, 2023 5:51 PM

**To:** <REDACTED> <REDACTED>@simplybluegroup.com>

**Cc:** [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

It would be useful if you could provide further information outlining what you wish to discuss so that we can identify appropriate colleagues to participate from this end and also to look at calendar commitments.

For your information, I have attached a copy of our scoping response provided to Argyll and Bute council (consultation request Ref: 22/02263/SCOPE); based on the information that was provided at that time, we did not identify any “show stoppers”, however our response identified the information that should be provided with any future planning application. Please be aware that any advice / assessment provided in response to a statutory consultation request will be based on the information presented at that time and may vary from that detailed in the attachment.

With regard to discussion with colleagues in the SG Aquaculture Policy team, I can pass on your details and ask that they follow up with you from their end.

Kind regards,  
<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Friday, September 22, 2023 3:48 PM  
**To:** <REDACTED> <<REDACTED>@gov.scot>  
**Cc:** MS FFPlanning <MS.FFPlanning@gov.scot>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thanks for getting back to me on this – it would be great to have the discussion with the staff who would provide the statutory consultee comments if/when the planning application is submitted if possible. It might also be good to speak more generally about the site to someone in the Aquaculture Policy team generally at this stage too. I’m really just looking to introduce the project, the site and see whether there’s anything that yourselves would see as prohibitive at this stage to the development going ahead.

Many thanks,

<REDACTED>  
<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot>  
**Sent:** Friday, September 22, 2023 12:50 PM  
**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Cc:** MS.FFPlanning@gov.scot  
**Subject:** FW: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

<REDACTED> has passed your query to the FHI regarding your new site proposal. Could I ask if you had intended discussing this issue with SG Aquaculture Policy officials or if you had intended having a pre-application discussion with the staff who

would provide statutory consultee comments on the aquaculture planning application, if requested by the local authority planning department.

If it is the latter, next week may not be the best option for ourselves but someone from the team (email copied in) will be in touch to arrange an appropriate time. If you had intended discussing with Aquaculture Policy colleagues please let me know and I will pass your details on.

Regards  
<REDACTED>

<REDACTED>

**Technical Manager, Fish Health Inspectorate, Marine Directorate**

Scottish Government, Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB

T: <REDACTED>

S/B: 0131 244 2500

M: <REDACTED>

E: <REDACTED>@gov.scot

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>

**Sent:** Friday, September 22, 2023 9:17 AM

**To:** <REDACTED> <<REDACTED>@gov.scot>

**Subject:** FW: Loch Long Salmon - Site Introduction

Morning <REDACTED>,

Hope you're doing well? As you'll have likely seen, we are looking at developing a site up within the Highland region using a similar technology to that proposed at Beinn Reithe. I've not yet managed to get a call with anyone at the Marine Directorate to introduce the project and site and get any feedback. I've recently gone to the Highland Council for Pre-Application Advice so it would be a good time to pick up with someone if possible. Do you have any availability next week (or can you suggest who might be a more suitable contact)?

Many thanks,

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot>

**Sent:** Thursday, September 21, 2023 3:36 PM

**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>

**Cc:** <REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;  
<REDACTED>@gov.scot

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>

<REDACTED>, <REDACTED> has had prior engagement with Loch Long Salmon (LLS) and I'm therefore copying her and wider colleagues into this exchange.

I understand that the initial planning application for LLS was refused and the company have appealed that decision with an inquiry opening next week (the 25th Sep). You'll understand that given the ongoing appeal it's not possible to discuss any aspect of that process or the details of a potential MFS application for LLS at this site.

Depending on how the appeal progresses there may be an opportunity in the future to set up a Team call.

Regards

<REDACTED>

<REDACTED>, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: <REDACTED>

E:<mailto:<REDACTED>@gov.scot>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>

**Sent:** Thursday, September 21, 2023 2:39 PM

**To:** <REDACTED> <<REDACTED>@gov.scot>

**Subject:** Loch Long Salmon - Site Introduction

Good Afternoon,

Hope you're doing well? I was having a chat with <REDACTED> of HIE yesterday and mentioned that I was hoping to speak with someone within the Marine Directorate around a site that Loch Long Salmon are looking to develop up in the Highland region. If you're available, it'd be great to get a Microsoft Teams meeting together and I can introduce myself, the site (and also the company & technology if required). Is this something you'd be able to do? It would also good to know more about the scope of Marine Fund in general.

Many thanks and looking forward to speaking with you,

## Email chain 1 - Branch 1a

**From:** <REDACTED> <<REDACTED>@gov.scot>  
**Sent:** Friday, November 3, 2023 2:44 PM  
**To:** MS FFPlanning <MS.FFPlanning@gov.scot>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Thanks <REDACTED>. Can you please send an acknowledgement to <REDACTED> and add to my worklist on the spreadsheet – thanks.  
<REDACTED>

**From:** <REDACTED> <<REDACTED>@gov.scot> **On Behalf Of** MS FFPlanning  
**Sent:** Thursday, November 2, 2023 2:43 PM  
**To:** <REDACTED> <<REDACTED>@gov.scot>  
**Cc:** <REDACTED> <<REDACTED>@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>  
**Subject:** FW: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Please see below an email from <REDACTED> following your meeting. I will also save it to PC-23-010.

Thanks  
<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Thursday, November 2, 2023 1:29 PM  
**To:** MS FFPlanning <MS.FFPlanning@gov.scot>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thanks for the meeting with yourself and the team earlier – I feel as though it was very beneficial. Just to summarise a few actions/bullets below:

- Categorisation of Loch Carron from a 3 to a 2 following the assessed impact of the potential development would not prompt an objection, a recategorization from a Category 3 to a Category 1 would be unacceptable.
- Action on <REDACTED> to assess biomass impact on loch categorisation through aqueous and solids modelling at 8000t and 500t intervals of biomass reduction
- Action on <REDACTED> to ensure that production strategy, EMP and disease management plan/risk assessment is available at the time of full application

Many thanks again for the meeting and we can look to get another one set up at the end of Dec/ start of January once the design has progressed further.

Kind regards,  
<REDACTED>  
<REDACTED>  
<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot> **On Behalf Of** [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)  
**Sent:** Wednesday, October 25, 2023 3:46 PM  
**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>; [MS.FFPlanning@gov.scot](mailto:MS.FFPlanning@gov.scot)  
**Subject:** RE: Loch Long Salmon - Site Introduction

Good afternoon <REDACTED>,

At the moment we could offer the following times:

Thursday 2<sup>nd</sup> November 11:00 – 12:00

Thursday 9<sup>th</sup> November 10:00 – 10:30

Friday 10<sup>th</sup> November 13:00 – 14:00

Please let me know if any of the above options suit you and I can then send a Teams link.

Kind regards,  
<REDACTED>



## Email chain 1 - Branch 1b

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Tuesday, December 19, 2023 9:43 AM  
**To:** <REDACTED> <<REDACTED>@gov.scot>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Morning <REDACTED>,

Many thanks for this summary – much appreciated.

I hope you have a good Christmas period!

Kind regards,

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot>  
**Sent:** Friday, December 8, 2023 8:36 PM  
**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Cc:** MS.FFPlanning@gov.scot  
**Subject:** RE: Loch Long Salmon - Site Introduction

**CAUTION:** This email originated from outside of Simply Blue Group.

Hi <REDACTED>,

Loch Carron is currently a Locational Guidelines Category 3 sea loch, with 2 CAR licences and a maximum consented biomass of 2687 tonnes. I have undertaken modelling to include a variety of additional biomass and provide a summary of the outcome below:

Adding an additional 8000t would result in the loch becoming a Category 2 sea loch.

Adding an additional 1000t would result in the loch remaining a Category 3 sea loch.

Adding an additional 1500t would result in the loch becoming a Category 2 sea loch, therefore the threshold would be somewhere between 1000t and 1500t for the category change.

I hope this is helpful to your ongoing considerations.

Kind regards,

<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Wednesday, December 6, 2023 9:43 AM  
**To:** <REDACTED> <<REDACTED>@gov.scot>

**Cc:** MS FFPlanning <MS.FFPlanning@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thanks for getting back to me on this – much appreciated and looking forward to hearing your thoughts on the capacity of the loch to support both this site and the existing one and therefore indication of appropriate biomass of this site if it were to be a conventional pen.

Many thanks,

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot>

**Sent:** Tuesday, December 5, 2023 3:21 PM

**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>

**Cc:** MS.FFPlanning@gov.scot; <REDACTED>@gov.scot

**Subject:** RE: Loch Long Salmon - Site Introduction

**CAUTION:** This email originated from outside of Simply Blue Group.

Hi <REDACTED>,

Apologies for the delay in dealing with this. I am aiming to provide a response this week.

Kind regards,

<REDACTED>

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>

**Sent:** Friday, November 24, 2023 1:59 PM

**To:** <REDACTED> <<REDACTED>@gov.scot>

**Cc:** MS FFPlanning <MS.FFPlanning@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>

**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Just following up on this and wondering whether you've been able to perform the calculations to assess the biomass impact on loch categorisation through aqueous and solids modelling? Alternatively, do you have an unlocked version of the calculation sheet that I would be able to have to conduct these myself?

Many thanks,

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot> **On Behalf Of** MS.FFPlanning@gov.scot  
**Sent:** Monday, November 6, 2023 1:13 PM  
**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thank you for the below summary of the meeting you had with <REDACTED>, <REDACTED> and <REDACTED>. <REDACTED> will look at the action point and get back to you in due course with her response.

Kind regards

<REDACTED>

<REDACTED>

<REDACTED>, **Marine Directorate**

Scottish Government, Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB

S/B: 0131 244 2500

**From:** <REDACTED> <<REDACTED>@simplybluegroup.com>  
**Sent:** Thursday, November 2, 2023 1:29 PM  
**To:** MS FFPlanning <MS.FFPlanning@gov.scot>  
**Subject:** RE: Loch Long Salmon - Site Introduction

Hi <REDACTED>,

Thanks for the meeting with yourself and the team earlier – I feel as though it was very beneficial. Just to summarise a few actions/bullets below:

- Categorisation of Loch Carron from a 3 to a 2 following the assessed impact of the potential development would not prompt an objection, a recategorization from a Category 3 to a Category 1 would be unacceptable.
- Action on <REDACTED> to assess biomass impact on loch categorisation through aqueous and solids modelling at 8000t and 500t intervals of biomass reduction
- Action on <REDACTED> to ensure that production strategy, EMP and disease management plan/risk assessment is available at the time of full application

Many thanks again for the meeting and we can look to get another one set up at the end of Dec/ start of January once the design has progressed further.

Kind regards,

<REDACTED>

<REDACTED>

<REDACTED>

**From:** <REDACTED>@gov.scot <<REDACTED>@gov.scot> **On Behalf Of** MS.FFPlanning@gov.scot

**Sent:** Wednesday, October 25, 2023 3:46 PM

**To:** <REDACTED> <<REDACTED>@simplybluegroup.com>; MS.FFPlanning@gov.scot

**Subject:** RE: Loch Long Salmon - Site Introduction

Good afternoon <REDACTED>,

At the moment we could offer the following times:

Thursday 2<sup>nd</sup> November 11:00 – 12:00

Thursday 9<sup>th</sup> November 10:00 – 10:30

Friday 10<sup>th</sup> November 13:00 – 14:00

Please let me know if any of the above options suit you and I can then send a Teams link.

Kind regards,

<REDACTED>

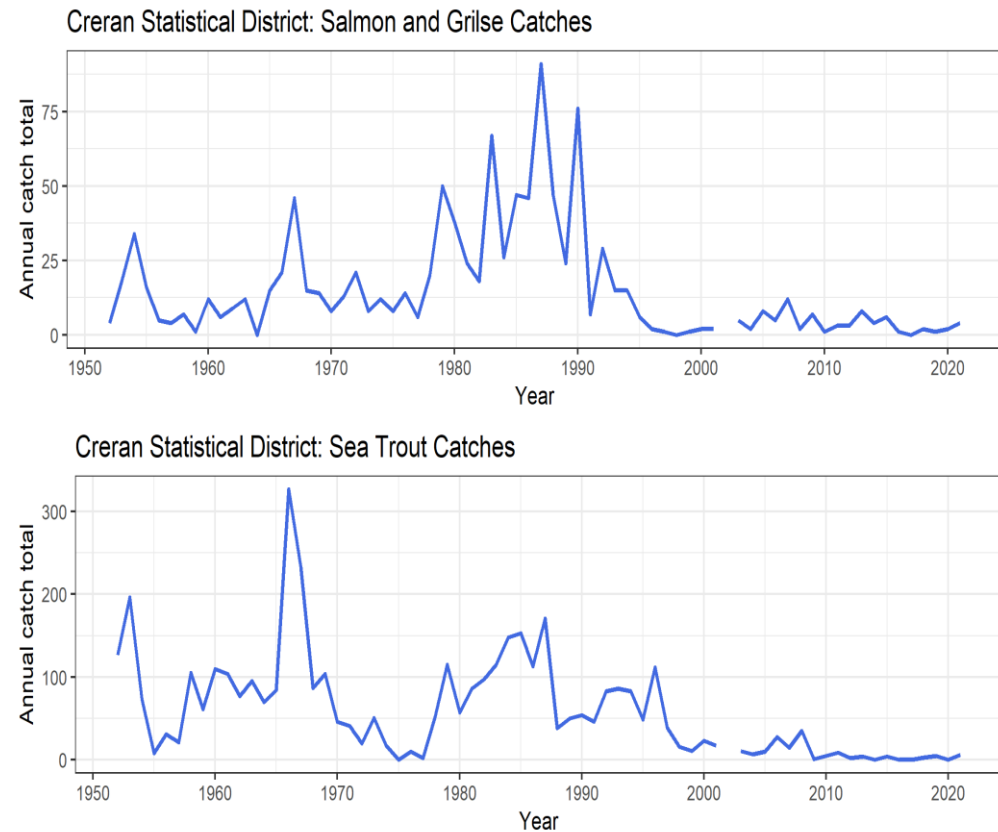
**.Project Name:** Lurignish  
**Location:** Loch Linnhe  
**Other identifier:** 22/02263/SCOPE

<b>Screening &amp; Scoping Checklist</b>	
For each of the numbered potential impacts in the left hand column, consideration should be given to the following points:	
<ul style="list-style-type: none"> <li>A. Will the impact have an effect on any of the receptors or issues identified in sections 4.1 to 4.4 Have all the receptors/issues/effects been identified. Explain.</li> <li>B. Is the impact covered by other regulation? State your reasons for wishing to discuss it further in this document.</li> <li>C. Is there potential for cumulative or indirect impact on an identified receptor. Explain.</li> <li>D. SCREENING ADVICE. Is the impact on receptor(s) likely to have a significant effect. Explain.</li> <li>E. SCOPING ADVICE. If so, what details of additional information required and methodology</li> </ul>	
<i>Provide concise information, and refer it specifically to elements A to E where appropriate.</i>	

<b>IMPACT TYPE</b>	<b>INSERT YOUR COMMENTS IN THE APPROPRIATE ROW</b>
<b>1. Benthic Impacts</b>	
DEVELOPER	
STATUTORY CONSULTEE	<b>MSS</b> As a new site, potential benthic impacts will need to be assessed. The applicant has noted that they intend for waste to be collected in a sump at the bottom of the enclosures rather than be dispersed across the seabed, thus reducing benthic impacts. We would request that suitable modelling / evidence be submitted for assessment with any future planning application demonstrating the extent of potential impacts and the acceptability of the proposal. This information should be based on the finalised location, and number and layout of the enclosures consistent with what is being applied for under CAR and planning.
<b>2. Water Column Impacts</b>	
DEVELOPER	
STATUTORY CONSULTEE	<b>MSS</b> The proposed site sits within an area of Loch Linnhe that is out-with the Locational Guidelines categorised water body. Appropriate ECE modelling should be undertaken to show the degree of nutrient enhancement likely to result from the site operating at the maximum biomass being applied for. A cumulative assessment should also be undertaken, which includes all relevant consented biomass within the assessment area. Full details of the calculations should be submitted with any future planning application.
<b>3. Interaction with Predators</b>	
DEVELOPER	
STATUTORY CONSULTEE	<b>NA</b>
<b>4. Interaction with Wild Salmonids</b>	
DEVELOPER	
STATUTORY CONSULTEE	<b>MSS</b> <b><u>Wild Fisheries</u></b>  The following should be read in conjunction with the latest summary of information relating to impacts of sea lice from fish farms on Scottish sea trout and salmon, available on the Marine Scotland webpages: <a href="https://www.gov.scot/publications/summary-of-information-relating-to-impacts-of-salmon-lice-from-fish-farms-on-wild-scottish-sea-trout-and-salmon/">https://www.gov.scot/publications/summary-of-information-relating-to-impacts-of-salmon-lice-from-fish-farms-on-wild-scottish-sea-trout-and-salmon/</a>  There are three active finfish sites within 15 km of the proposed site. As such,

cumulative impact factors may come into play.

The waters around Lochs Linnhe and Creran are known to have fisheries for salmon and sea trout. The following graphs plot the rod catches for Atlantic salmon and sea trout from 1952 – 2021 in the Creran Statistical District within which the site will be located. Due to the area covered by the Creran Statistical District these figures may not be representative of the catches in the immediate area and are only provided to give an indication of catch trends in the local area. Data source: <https://data.marine.gov.scot/dataset/salmon-and-sea-trout-fishery-statistics-1952-2021-season-reported-catch-district-and-method>



The proposed site location is proximate to Loch Creran and the River Creran. It is noted that the River Creran has a proposed grading of grade 3 for the upcoming fishing season in 2023. With a grading of 3 the River Creran has a <60% chance of meeting its conservation limit, meaning that the salmon stock in the river is below a sustainable level. For more information on conservation limits and river gradings please visit: <https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings/pages/overview-and-gradings>

Scientific evidence from Norway and Ireland indicates a detrimental effect of sea lice on sea trout and salmon populations. Salmon aquaculture results in elevated numbers of sea lice in open water and hence is likely to have an adverse effect on populations of wild salmonids in some circumstances. The magnitude of any such impact in relation to overall mortality levels is not known. However, concerns that there may be a significant impact of aquaculture have been raised due to declines in catches of both salmon and sea trout on the Scottish west coast. The summary webpage linked above provide a more detailed summary of the latest scientific knowledge in this area.

Information from the west coast of Scotland suggests lice from fish farming

can cause a risk to local salmon and sea trout. This information can be used to give an idea of the relative risk to salmon and sea trout which is governed, and can be mitigated, by a number of factors, in particular the siting of the farm and its ability to effectively control sea lice. The greater the number of lice on the farm the greater the risk to wild salmon and sea trout. While it is not possible to accurately predict the future lice levels on a farm the performance of existing farms within the area could act as a guide for future performance.

Sea lice counts on farms are regularly reported, either through industry reporting to Scottish Ministers or by Fish Health Inspectorate surveillance. Recent information for this site suggests that the operator is adequately controlling lice numbers on the site. The reports can be found at the following web address: <https://www.gov.scot/publications/fish-health-inspectorate-sea-lice-information/>

This development has the potential to increase the risks to wild salmonids.

The applicant appears to be aware of the potential impacts on salmon and sea trout and has indicated that they intend to manage the site under a Farm Management Plan, which will include a Sea Lice Management Strategy. The site is within the M-36 FMA which contains 13 other sites in the Linnhe, Creran and Etive area.

It should be noted that sea trout are present in these inshore waters all year round, and not just during the spring smolt migration period. We therefore suggest that strict control of sea lice should be practiced throughout the year. Additionally, it should be noted that adherence to the suggested criteria for treatment of sea lice stipulated in the industry CoGP may not necessarily prevent release of substantial numbers of lice from aquaculture installations.

The applicant has not supplied an Environmental Management Plan (EMP) outlining how potential interactions of sea lice arising from the proposed development will be assessed with respect to wild salmonids. Should the applicant go on to submit a planning application in the future, Marine Scotland requires that a document (EMP) is included outlining how potential interactions with wild salmonids will be assessed. Marine Scotland expects that as a minimum any monitoring scheme will be able to report on the level of lice released into the environment (i.e. both farmed fish numbers and adult female lice numbers); identify the likely area(s) of sea lice dispersal from the farm; details how and what monitoring data will be collected to assess potential interaction with wild fish; and details how this monitoring information will feed back to management practice. This plan should also include a regular review process to ensure that it remains fit for purpose.

#### **Sea lice efficacy**

The applicant has stated that they do not intend to apply for chemotherapeutants for the treatment of sea lice. Providing this remains the case, no further information is required with any future planning application, however the applicant should present a clear statement of their intentions. Should the applicants plans change and they subsequently make the decision to include chemotherapeutants as an option for the treatment of sea lice, a sea lice efficacy statement including the relevant modelling reports consistent with the cage arrangement and maximum biomass being applied for should be submitted with any future planning application. Details should include the maximum biomass that can be treated with in-feeds likely to be consented at the site and the time taken to **practically administer and complete** bath treatments to all cages at maximum biomass without breaching relevant EQS. Information provided at the planning stage should consider SEPA's most up to date information on the use of emamectin benzoate and any effect this may have on the quantities of chemotherapeutants likely to be available for use on

	the site. Information on the maximum biomass that can be treated on site after consideration of the position statement should be confirmed and clearly presented, considering any relevant constraints.
<b>5. Impacts upon species or habitats of conservation importance, including Sensitive Sites</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>6. Navigation, Anchorage, Commercial Fisheries, other non-recreational maritime uses (MOD)</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>7. Landscape and Visual Impacts</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>8. Noise</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>9. Marine Cultural Heritage</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>10. Waste Management (non-fish)</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>11. Socioeconomic, Access and Recreation</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>12. Traffic and Transport</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<b>NA</b>
<b>13. Any other issue</b>	
DEVELOPER	
STATUTORY CONSULTTEE	<p><b>MSS</b>  <u><b>Aquaculture Animal Health</b></u></p> <p><b>Site Location</b>  There are currently no sites registered with Marine Scotland Science within 1000m of the proposed new site (see appended map).  <i>It should be noted that all measurements are taken from the mid point of site coordinates.</i></p> <p><b>Authorisation</b></p>



If permission is granted for the new site, Loch Long Salmon must contact the FHI at Marine Scotland to apply for authorisation to operate as an Aquaculture Production Business at the proposed site prior to the commencement of farming operations.

#### **Disease Management Area**

The proposed site would be located in disease management area (DMA) 15b - Linnhe, Firth of Lorne, Sound of Mull and Loch Sunart and as such will have an impact on or be impacted upon by sites within this DMA as currently defined in Marine Scotland disease management area maps, available online <https://www.gov.scot/publications/fish-disease-management-areas>. It is therefore recommended that management agreements with all other operators sharing the same disease management area are in place and that disease management areas hold a single year class of stock and follow synchronous fallowing patterns.

#### **Stocking**

The maximum biomass proposed, **up to 8,000t**, is higher than any single operational fish farm site in the Scottish aquaculture industry. The application proposes **up to 8** semi closed containment enclosures suspended from floating collars and surrounded by an impermeable membrane, containing a fish holding net within. No size dimensions are provided for the production enclosures and these are required, including the depth of the internal fish holding net in order for the proposed stocking density to be calculated. Confirmation on the proposed stocking density and maximum biomass should also be provided.

When the entry to harvest model is utilised a semi enclosed square enclosure for harvesting from will also be used, with a side width of a maximum of 50m; no depth is provided for the fish holding nets in this enclosure and this is required. Furthermore, the applicant state that this enclosure will be split into 4 smaller enclosures; details of how this will be achieved practically and how this will impact operations are required with regard to stocking density and also to ensure containment of the stock whilst performing harvesting operations.

The lack of information on size prohibits consideration of the proposed stocking densities at this stage. However, given the high proposed maximum biomass (double that of any production site in Scotland), the stocking densities on site are expected to be high. The applicant should be aware that stocking densities over 22kg/m<sup>3</sup> are typically associated with poorer welfare standards, particularly in open cage net farming. Should higher stocking densities be proposed, evidence in the form of peer reviewed literature of projects at a similar scale to the proposal to support the appropriateness of these high stocking densities without impacting health and welfare of the animals should be provided.

In the absence of suitable peer reviewed literature the applicant should develop a program to monitor operational welfare indicators (OWI) of the aquaculture animals on site; including welfare indicators to be employed as a minimum welfare assessment, regularity of assessments, knowledge and experience of those conducting welfare assessments, a feedback mechanism to address any concerns that may be raised through the assessments and detail specific actions to resolve any issues for aquaculture animals should a deterioration in OWI or welfare concerns caused by higher stocking densities be identified.

The entry to harvest stocking model removes the largest fish from a production enclosure transferring by wellboat to the harvesting enclosure after 11-12 months. Stock will be harvested over a period of 1-8 days. The largest

fish will continue to be removed from the production enclosures to the harvesting enclosures until harvesting is complete. The proposed stocking density for the harvest enclosure at maximum stocking should be provided.

The post-smolt stocking model will rear salmon from smolts for up to 10 months before transferring live by wellboats to another fish farm site for on-growing. Information on where the fish will be transferred to is not known. It should be noted that movements of fish between areas (DMAs/farm management areas (FMAs)), increases the risk of spreading disease and is against best fish health practice. Movements between FMAs should be subject to the satisfactory outcome from a documented risk assessment by the receiving farms; and where multiple operators are present in the receiving FMA, written agreement is required from other operators in the FMA. Whilst it may not be possible to provide a specific risk assessment in advance of knowing the receiving site; details of the considerations made to mitigate against the risk of disease spread should be provided, if movements out with the FMA are proposed.

### **Husbandry**

Mortalities will be removed from production enclosures with an automatic airlift system, 3 times per week as a minimum. Mortalities will be stored in containers on retrieval from the airlift and transferred from the site to the terrestrial area where they may be ensiled or incinerated prior to collection and removal. Further details on the containment of dead fish being brought ashore for disposal should be provided to ensure mitigating the risk of disease spread has been considered. Confirmation on the proposed disposal method and route should be provided with the final planning application where possible. Details should also be provided on the proposed mortality removal methods for the harvest enclosure where stock are to be held for up to 8 days should these differ from the production pens.

Contingency for mass mortality events should also be submitted, including how swift removal of mortalities from enclosures will be facilitated in the system if required and considerations for the biosecure storage and disposal of mortalities and any modifications to these procedures where listed disease is present.

A Biosecurity Measures Plan (BMP) will be required prior to the business operating a farm at this location. Details of the BMP requirements can be found online [Biosecurity Measures Plan - gov.scot \(www.gov.scot\)](http://www.gov.scot/BiosecurityMeasuresPlan). The BMP or details on intended biosecurity protocols on site should be provided with the planning application, with reference to on site biosecurity between production enclosures and harvest enclosures, in addition to interactions between this site and other sites in the wider area.

### **Production Environment Control Systems**

The successful operation of the site relies on more technology and additional infrastructure than a traditional marine farming pen site. The controlled environment may offer benefits, however the failure of any of these elements could have a huge impact on the operation of the site. Detailed information should be provided of contingencies in place to ensure suitable environmental parameters can be maintained within the production facilities and how the adverse effect from any failures of equipment, or supply and disposal logistical processes is mitigated against.

The following areas have been identified as requiring detailed information:

- **Waste removal system** – The floating umbilical delivers feed, oxygen and power, removes waste and provides a route for data transmission cables. It will consist of HDPE pipes running from the terrestrial area to the marine farming enclosures and will be bundled marked and

appropriately secured. Where possible and practical pipes will be constructed from a single piece to improve security. Furthermore, a back-up submerged umbilical system will also be in place delivering essential oxygen and power should the primary floating umbilical become damaged at which point feeding would be suspended, reducing waste until repairs have taken place. Depending on timescales for repairs this could begin to present health and welfare issues; information on proposed timescales should be provided.

- **Water Quality** – failure of pumps taking water into pens from depths, failure of oxygen supply to the shore base and then to pens, procedures in place to monitor water quality in cage and actions to be taken if water quality falls below required standard.
- **Water processing plant** – failure of water processing plant, monitoring of water quality parameters and actions to be taken if water quality falls below required standard.
- **Access** – an new track will be required to reach the shorebase; assurance that access can be maintained at all times for staff to gain access and deliveries of oxygen and uplift of waste products. If access is an issue, how much oxygen and waste can be stored on site – how long before it becomes a problem?
- **Power/communications** – in the event of a grid power failure on site, there will be at least two, up to four independent back-up generator systems, only one is essential for the continued removal of waste from water, there will also be on site diesel storage capacity. How much additional power do generators provide, how long before this runs out? Does it provide a replication of all services or just cover basic essentials? How much diesel is stored on site and how long will that last? Alarm systems often rely on use of telecommunications, internet or mobile phone signals and as the site is in a fairly remote location these services may be limited. Details should be provided of how alerts for system failures will operate; including information on the availability and reliability of telecommunications, internet or mobile phone signals at the location of the site.

### **Sea Lice**

The proposed site will be located in farm management area (FMA) M-36. There are 13 active fish farm sites in this area operated by 3 different operators, including salmon sites in Loch Linnhe, the Firth of Lorne and Loch Creran and 4 marine rainbow trout sites in Loch Etive. Both salmon and rainbow trout sites reported several weeks over the MS increased monitoring/reporting level of 2 adult females in autumn 2019 and autumn/winter 2020. However, during 2021 and 2022 salmon sites were mostly below the MS increased monitoring/reporting level of 2 adult females. The rainbow trout sites experienced high sea lice levels over the summer in 2021, with sites over the MS increased monitoring level of 2 adult females for 6 weeks and also 5 weeks over the MS intervention limit of 6 adult females; two sites were issued with warning letters and an advisory letter was issued to one other site. Following physical and chemotherapeutant treatments and harvesting, numbers dropped back below the increased monitoring level after these 11 weeks. In late summer 2022 a similar situation arose following a plankton bloom, however this event was much shorter and brought back below MS increased monitoring levels within 5 weeks.

To the knowledge of the FHI this FMA is already an area of non-synchronous stocking and fallowing. Furthermore, from the information provided on the stocking regime, it would suggest that the proposed site would also be stocked for shorter periods than a traditional production cycle. Production farms within a defined FMA should be fallowed synchronously on a single year class basis, any exception to this should be subject to a documented risk assessment as

per the CoGP 3.101. (detailed below). **This risk assessment should be submitted.**

*CoGP 3.101*

- *A documented risk assessment, which considers the risks to the company's own operations and to the operations of other companies operating within the FMA and in any adjacent FMA, should be undertaken and management systems adopted that maintain risks at a satisfactorily low level;*
- *This risk assessment should include detailed information on strategies to be followed for pathogen and parasite control in the absence of following.*

The semi enclosed nature of the site surrounds the fish containing net with an impermeable and opaque barrier. Water will be pumped into the enclosure from depths of over 20m, which the applicant state is below which sea lice are present, thus aiming to exclude sea lice from the site. Whilst the physical barrier is the main intervention in prevention of sea lice on site, the applicant should still provide a specific written procedure for sea lice management giving a clear overview of the sea lice management strategies to be employed or available on the site. This should include details of contingencies in place if the external barrier is damaged or the biosecurity of systems is breached.

It is stated that a sea lice management strategy will be included in the farm management plan that will be submitted with the EIA report and include details of the measures proposed. The applicant has stated that monitoring of sea lice numbers will take place through weekly counts. Consent for sea lice chemotherapeutants will not be sought as the system proposed is expected by the applicant to exclude sea lice. If sea lice treatments are required this would be conducted through hydrogen peroxide bath treatment, freshwater bath treatment or physical removal methods. Details of the availability and source of such equipment or resources and the practicalities of conducting these treatments within the enclosures should also be considered and provided, as this impacts the efficacy of these interventions as back up contingencies should sea lice be found on site. The applicant have also applied for two pens (up to 40m diameter) to be utilised for the storage of freshwater and also state that a desalination plant to fill the freshwater storage pens may be used. Should this be pursued as a viable option, further information on the operation of this and how freshwater bath treatments would be conducted should be provided.

Further information should also be provided on the actions to be taken in response to results of monitoring that show sea lice are present, in terms of selection of a suitable intervention. The applicant should also be aware of the statutory reporting obligations to ensure satisfactory measures for the prevention, control and reduction of parasites on fish farms. The Fish Farming Businesses (Reporting) (Scotland) Order 2020 came into force on 29 March 2021, requiring Aquaculture Production Businesses in Scotland that farm fish at sites (not in freshwater) to report the average number of adult female sea lice (*L. salmonis*), counted per fish per site weekly, to the Scottish Ministers one week in arrears. Further information can be found online <https://www.gov.scot/publications/fish-health-inspectorate-sea-lice-information/>.

**Containment**

An appropriate site specific contingency plan detailing actions to be taken in the event of an escape or suspected escape event should be submitted.

Full details should be provided on equipment and strategies proposed to

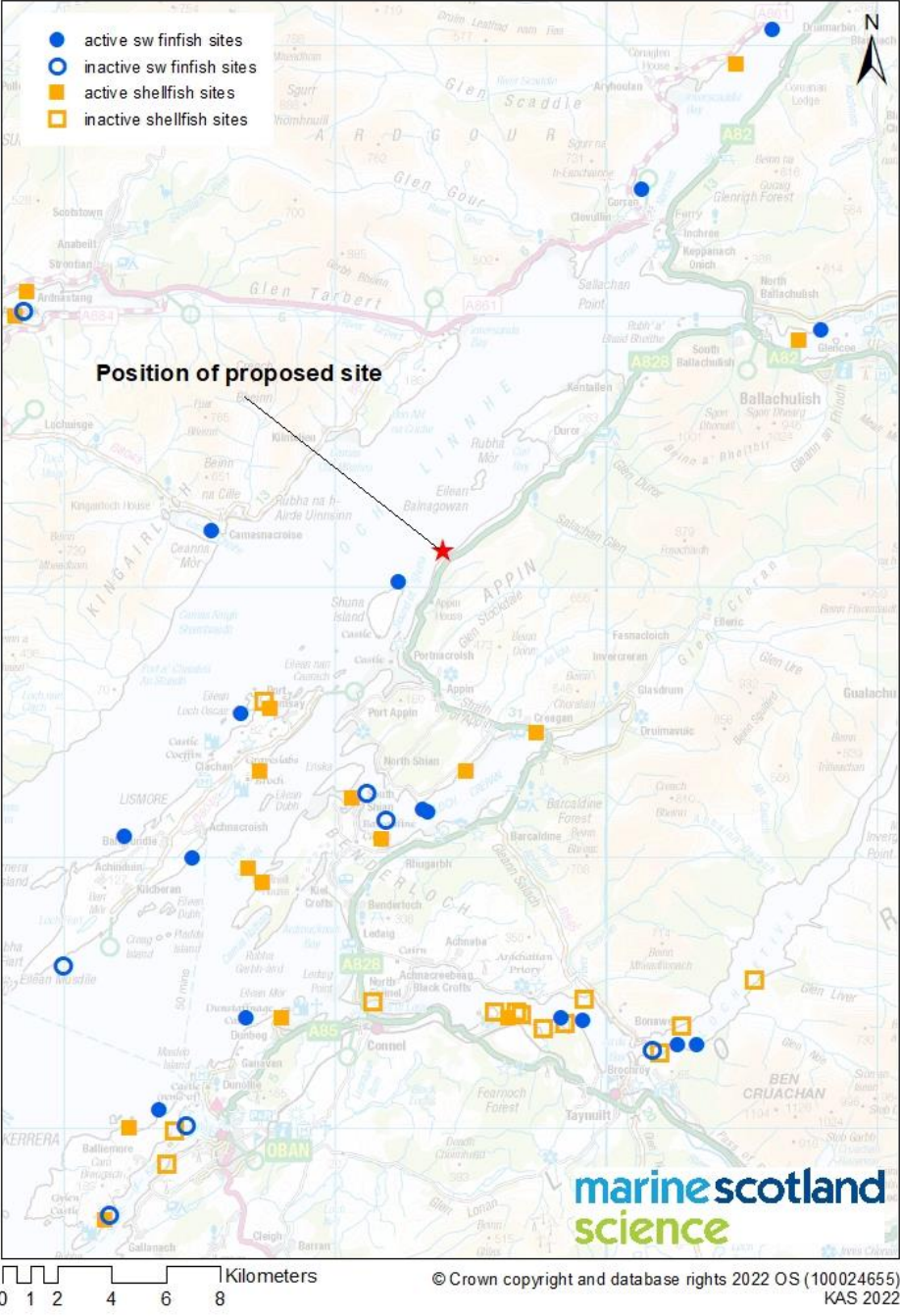
minimise predator interactions at the site in question; it is stated that a Predator Exclusion Plan will be developed; this should be provided with the planning application. The enclosed 'impermeable opaque bag' is reported to reduce interest and interference from marine predators, by removing visual cues and adding an additional barrier between predators and stock. Information on the material the 'impermeable opaque bag' is constructed from and how it can withstand predator interaction should be provided. Confirmation that the same measures are proposed for the harvest enclosure, or details of the measures proposed for the harvest enclosure should be provided.

Environmental conditions likely to be encountered at the site should be considered in conjunction with the specifications of the equipment, to establish if the equipment can endure the conditions at the proposed site and no breaches in containment should occur through chaffing between different components of the production equipment or moorings. Evidence that equipment (nets, pens and moorings) is suitable for purpose **on the site in question** is required in the form of a **site specific** attestation from the manufacturer or other suitably qualified person. In lieu of this, equipment specifications detailing the environmental conditions (current speed and wave height) the pens and moorings can withstand should be provided, in combination with details of the environmental conditions (current speed and wave height) experienced at the site location.

It is stated that a comprehensive mooring analysis will be conducted in accordance with A Technical Standard for Scottish Finfish Aquaculture based on the wind and wave climate and tidal flow data at the site, with the recommended and appropriate safety factors applied. However, this is proposed to be undertaken later in the project development **after planning permission has been granted**. If this information is not provided MSS cannot comment on the suitability of the proposed equipment for ensuring satisfactory measures are in place for the containment of fish on the farm and prevention of escape of fish from the fish farm.



**Aquaculture sites in the vicinity of proposed semi-closed containment marine fish farm site at Lurignish, Loch Linnhe, Argyll by Loch Long Salmon Ltd.**



### TEMPLATE TRANSFER GUIDANCE – 1

After the developer has completed the Proposal box and Sections 2, 3, 4 and the relevant rows of Section 5, the current version of the master template, **should be emailed or posted on CD-ROM to the relevant authority (local authority planning department).**

*The template should have a unique file name, which might usefully include the date at which this version is emailed/posted to the relevant authority.*

### TEMPLATE TRANSFER GUIDANCE – 2

After the relevant authority (local authority planning department) has completed Section 1, the current version of the master template, **should be emailed or posted on CD-ROM to the statutory consultees.**

*The template should have a unique file name, which might usefully include the date at which this version is emailed/posted to the statutory consultees.*

## 6 STATUTORY CONSULTEE RESPONSE

### 6.1. Organisation: Marine Scotland Science

Contact name: <REDACTED>  
Directorate/Division/Agency: Marine Scotland Science  
Telephone number: <REDACTED>  
Email: <REDACTED>@gov.scot

We have considered this proposed development in terms of formal EIA Screening and Scoping, and have completed our assessment of the significance of potential environmental impacts.

*Check or complete the following fields as required.*

We obtained supplementary information from the developer during our consideration

We consulted with other Statutory Consultees during our consideration

Our advice as to your Scoping opinion/advice, relating to environmental information that should be included in an Environmental Statement, is summarised as:

- Suitable benthic modelling demonstrating potential impacts and the acceptability of the proposal.
- Appropriate nutrient enhancement modelling and full details of the calculation (see comments in full).
- Sea lice efficacy – confirmation should be provided if no chemotherapeutants are being applied for or alternatively see comments in full for details of information required should the applicant subsequently wish to include chemotherapeutant treatments.

Our advice on additional information that should be submitted in support of any future planning application for the proposed development is summarised as:

- Size of production and harvest enclosures - including depth of fish holding nets.

- Details of how harvest enclosure will be split – practically and impact on operations with regard to stocking density and also to ensuring containment of the stock whilst performing harvesting operations.
- Maximum stocking density of harvest enclosure.
- Proposed stocking density and evidence to support the appropriateness of this for health and welfare of stock or a program for monitoring operational welfare indicators (as detailed in main body of response).
- Risk assessment/details of considerations made to minimise risk of disease spread from fish movements between FMA's (where applicable).
- Further details on the containment of dead fish being brought ashore for disposal.
- Confirmation on the proposed disposal method and route.
- Details on the proposed mortality removal methods for the harvest enclosure should these differ from the production pens.
- The BMP or details on intended biosecurity protocols on site.
- Detailed information on production environment control systems (as described in the main body of the response).
- Risk assessment for the non synchronous production in the FMA.
- A specific written procedure for sea lice management giving a clear overview of the sea lice management strategies to be employed or available on the site.
- Details of contingencies in place if the external barrier of enclosures is damaged or the biosecurity of systems is breached.
- Details of the availability and source of physical removal methods and the practicalities of conducting these treatments within the enclosures.
- Further information on the operation of the proposed desalination plant and how freshwater pens would be utilised and bath treatments (of freshwater or hydrogen peroxide) conducted in the enclosures.
- Contingency for mass mortality events, including how swift removal of mortalities from enclosures will be facilitated in the system if required and considerations for biosecure storage and disposal of mortalities and any modifications to these procedures where listed disease is present.
- Further information on the actions to be taken in response to results of monitoring that show sea lice are present, in terms of selection of a suitable intervention and details of reporting sea lice counts.
- An appropriate, site specific contingency plan detailing actions to be taken in the event of an escape or suspected escape event.
- Equipment and strategies proposed to minimise predator interactions at the site including information on the material the 'impermeable opaque bag' is constructed from and how it can withstand predator interaction and confirmation of measures proposed for the harvest



enclosure.

- Evidence of suitability of proposed equipment at the site in question (enclosures and moorings).
- An Environmental management Plan (EMP) outlining how potential interactions of sea lice arising from the proposed development will be assessed with respect to wild salmonids.

Electronic signature: <REDACTED>

Date: 13/12/2022