**Lochaber DSFB Clerk’s Update September 2023**

**A full summary of all matters will be covered in the Annual Report for 2023 issued at the next meeting. Meanwhile below is a summary of some of the key issues currently being addressed by the Board –**

**Loch Long Salmon**

As described at the last meeting, the Loch Long Salmon company are proposing to site an 8000 tonne semi closed containment salmon farm near Duror just south of the Lochaber boundary. We are taking a keen interest in this proposal as the activity is likely to have a significant impact on the wild salmonid populations further up the loch in the Lochaber region.

The proposal is to farm the fish in a unit encompassed by a impermeable membrane and to pump water from deeper in the water column into the farm – the company say that both of these measures will prevent sea lice from becoming a problem. They also make similar claims about waste management, seal predation and disease.

The proposal is currently at the stage that the company has made a notification of a pending application to Argyll Council, with a full planning application expected in the near future. I have met with the company twice concerning the proposal and in both instances I have expressed our deep concerns about the proposal. These can be summarised as follows –

1. There is doubt that the technology can be used for the full production cycle (recognised by the applicant) and therefore after 12 months the fish will have to be moved to open net pen farms, thereby removing all of the potential environmental benefits of the closed containment system.
2. The tonnage is nearly 4 times larger than any fish farm currently consented in the region – should there be an accident (sea attack, storm damage or human error) than the potential risk to surrounding salmon rivers would be catastrophic.
3. There are doubts from some other countries (notably Canada) that the claims made by the company about the credentials of the technology actually hold true. Repeated requests to the company for more information about its use in other areas have been met with silence so far.

The Lochaber DSFB take the position that new technologies that protect wild salmon and sea trout from the known impacts of open net farming in poor locations are to be welcomed, but only when the benefits are genuine and they do not present a potentially equal or greater risk to wild stocks. It is my view that this proposal does not sufficiently bring enough benefit for the DSFB to support it. Should the tonnage be reduced, the technology been shown to be proven, and the full production cycle takes place in the contained unit then I will re- assess the Board’s position on this.

**MOWI Loch Etive and Loch Linnhe production plans.**

MOWI recently purchased the sites in Loch Etive from the trout farming company Dawnfresh who were producing sea reared rainbow trout at the farms. MOWI have applied to SEPA to alter the site licence for them to farm salmon. I have met with MOWI about the proposal and also had considerable engagement with their environmental team as the proposal has a significant relevance to the existing MOWI sites in Upper Loch Linnhe.

Smolts will be farmed in Loch Etive to around 0.5kg in weight. Around 1st March these fish will be moved to the 2 sites in Upper Loch Linnhe where they will be farmed for 11 months to harvest size (circa 4.5kg). The site will be fallowed between harvesting and stocking. What this means is that the Linnhe sites will no longer be growing fish for the full 2 years cycle but will only hold fish for 11 months and be fallowed once every year.

I requested full modelling predictions on what this will mean for sea lice in Upper Loch Linnhe and this has been provided by MOWI. The overriding principle is that, while the fish being received will be larger in size, the fact that the fish will only be farmed for one year (and will be delivered lice free) then the lice will not build up, especially during the sensitive period of the wild smolt run.

I have said that we will run the scheme for one full cycle and then assess with the company whether the actual lice levels through the period are the same as the predicted modelling. I have insisted that if the modelled levels are not attained, or significantly breached, then the DSFB will insist that the production regime is scrapped and the company consider only stocking fish up to 1kg in the Upper Linnhe sites instead of larger fish. We should have an idea at the ed of 2024 how the first year under this new regime has fared.

The modelling report can be found on [PostSmolt Production and SeaLice Populations in Loch Linnhe 08.23vF.pdf](file:///C%3A%5CUsers%5Cjongi%5COneDrive%5CRIVER%20LOCHY%20ASSOCIATION%5CFISH%20FARMING%5C2023%5CPostSmolt%20Production%20and%20SeaLice%20Populations%20in%20Loch%20Linnhe%2008.23vF.pdf)

**SEPA Sea Lice Risk Assessment Framework**

Following the Salmon Farming Inquiry and its recommendations SEPA have been made the overall regulator of fish farms. The Inquiry concluded that the ‘status quo is not an option’ and in response to that SEPA are close to launching a new framework on sea lice and licencing.

The document can be found here <https://consultation.sepa.org.uk/regulatory-services/detailed-proposals-for-protecting-wild-salmon/>

 but the key features of this new framework is that for expanding and new sites a new threshold will be set that includes both the biomass on the farm as well as the number of sea lice. We have long been asking for this very important distinction. Whereas before there was a simple metric of 0.5 adult female lice in the sensitive period (Aroil to May) and 1 adult female per fish out ide this period, for all new and existing farms this will change to 0.75 infective lice per 0.75 m2 of biomass.

Furthermore, new Wild Salmon Protection Zones have been identified and the entire Lochaber coastline lies within these zones. Some particularly sensitive zones (Loch Linnhe, Loch Sunart and Loch Nevis) have also been identified and it is being suggested that these will require even tighter protection in the near future (although the specific proposals are as yet unclear).

Less encouraging are the lice limits being set for *existing* farms. The consultation states that these will simply be required to reach lice infection levels no worse than levels reached over the last 3 spring cycles ie. no deterioration. This is very disappointing as we had hoped that these farms would at least have been limited to 0.2 adult lice per fish in the sensitive period to protect wild smolts (down from the current 0.5 target). Lice control has not been encouraging in many places over the last 3 springs and the framework currently proposes nothing to reverse that through regulation.

**Coire Glas development**

There have been no significant developments with regards to this very large SSE pumped storage scheme above Loch Lochy. The impacts from this scheme, as discussed previously at Bard meetings, are both to the environment (fish habitat in Loch Lochy and downstream impacts on the River Lochy habitat) and also to the commercial salmon fishery on the River Lochy. I am representing the DSFB in order to address the environmental impacts and the Chairman of the River Lochy Association, Andrew Shaw, is representing the interest of the commercial rod fishery.

The scheme has been given planning permission under a Section 36 (where Scottish Ministers decide on planning for very large schemes such as this instead of the local authority). Exploratory tunnelling works are currently underway. We met with the company representatives in March which gave us an opportunity to further outline our concerns about fluctuating water levels, loss and disruption to habitat, fish passage at Mucomir nd impact on the salmon fishery downstream). We will be having another meeting shortly but I suspect this wil not be until the engineers have something concrete to show us for the Mucomir Barrage proposal and after the exploratory works have shown that the whole scheme is viable.

I am slightly comforted that the following condition has been made clear by Scottish Ministers within the Section 36 planning consent and that SEPA have assured us that they will liaise with us when it comes to authorising what remains at Mucomir. The condition reads –

*15.Modifications to Mucomir Barrage and Power Station*

*(1) There shall be no Commencement of the Development, other than Site Exploratory*

*Works, approved in terms of condition 9, unless and until details of any proposed*

*modifications to the Mucomir Barrage and Power Station have been submitted to in*

*writing and approved by the Planning Authority, in consultation with SEPA.*

*(2) Details must include the proposed means of regulating flows into the River Lochy and*

*details of any modifications proposed to the existing fish passage arrangements.*

*(3) The approved modifications must be implemented prior to the operation of the*

*generating station unless otherwise agreed in writing with the Planning Authority.*

*Reason: To ensure the approved flow regime downstream of the Mucomir Power Station is*

*maintained and the offered mitigation in respect of the fish passage is secured.*

**Seals and predation**

The Scottish Government have recognised the impact of seals and other predators in their Wild Salmon Strategy. FMS have been approached in recent weeks about possible public funding for acoustic deterrent devices (ADDs) to keep seals away from salmon in rivers. As an immediate response I have requested if we can have two of these devices – one for the Shiel and one for the Lochy in the first instance – and I await a response. It is encouraging that there is now the recognition that seal predation is a serious problem in some rivers.

**West Coast Tracking Project**

This project has now drawn to a close and the Atlantic Salmon Trust now has 3 years of data about fish leaving 2 Lochy tributaries and how they exit the inshore environment and travel to the open ocean. The number of smolts tagged was always going to be the limiting factor on defining set smolt routes to the ocean, but I am hopeful that this year’s data, which used tags which can measure temperature and depth, may give us some very useful information. Tags may, for instance, be able to be identified for temperature and depth anomalies if the fish has been predated on its journey and offer us locational information on this. The data is in the process of being collated and analysed and I am hopeful that the AST may report some findings by the end of this year, with an overall project report shortly after this.

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For any further information on the issues above or for other information on how the Board has been working in the interests of salmon and sea trout in your particular catchment, please email me on jongibb123@gmail.com