

The Scottish Salmon Company
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COMHAIRLE NAN EILEAN SIAR

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Our Reference MF/RMCL

Your Reference

Date 2 December 2022

Dear Sir/Madam

ENVIRONMENTAL IMPACT ASSESSMENT - SCOPING OPINION

APPLICATION REFERENCE:

22/00290

TYPE OF APPLICATION:

Combined screening / scoping

LOCATION OF DEVELOPMENT:

North Gravir Fish Farm

Gravir

Lochs

Isle Of Lewis

PROPOSED DEVELOPMENT:

**Installation of 5 x 200 m circumference
pens, associated infrastructure and a feed
barge (for Atlantic salmon marine finfish)**

REQUEST RECEIVED:

21 June 2022

I refer to your request for a Scoping Opinion, as detailed above.

Please find Comhairle nan Eilean Siar's Scoping Opinion enclosed. The Scoping Opinion can also be accessed on the [Comhairle's Public Access Planning Portal](#) using the Reference No above.

Yours faithfully

MC Ferguson

Morag Ferguson
Planning Manager (Development Management)
Communities Department



SCOPING OPINION

ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND)
REGULATIONS 2017

APPLICATION REFERENCE NO: 22/00290
TYPE OF APPLICATION: Combined screening / scoping
COMPLETE APPLICATION RECEIVED: 21 June 2022
DEVELOPMENT DESCRIPTION: Installation of 5 x 200 m circumference pens,
associated infrastructure and a feed barge
LOCATION OF DEVELOPMENT: North Gravir Fish Farm Gravir Lochs Isle Of Lewis
APPLICANT: The Scottish Salmon Company

In response to the request for a formal Scoping Opinion on the information to be addressed in an Environmental Impact Assessment (EIA) Report, Comhairle nan Eilean Siar, as Planning Authority, hereby adopts the attached opinion.

This opinion is adopted under the provisions of Regulation 17 of the Environmental Impact Assessment (Scotland) Regulations, 2017 and shall be placed on the register and made available for inspection in accordance with the provisions of Regulation 28.

Date 2 December 2022 Signed:

Planning Manager (Development Management)

DECISION NOTICE SENT TO: The Scottish Salmon Company
Per Penny Hawdon
Site Development Manager
Ardkinglas Estate
Cairndow
Argyll
PA26 8BH

Copy to: All Consultees

Proposed Development:	Installation of 5 x 200 m circumference pens, associated infrastructure and a feed barge
Location of Development:	North Gravir Fish Farm Gravir Lochs Isle Of Lewis
Reference:	22/00290

EIA development includes Schedule 2 development that is likely to have significant effects on the receiving environment by virtue of factors such as its nature, size or location.

The farm on account of its nature, scale (novel cage size (200m circles)) and biomass tonnage of 4680 tonnes, sited in a remote coastal location where there is likely to be cumulative impacts with other existing developments include use of shorebase facilities has been determined to be an EIA development.

In considering a scoping request the Comhairle as Planning Authority is required to consult with appropriate consultees and to take into account the specific characteristics of the particular development, the specific characteristics of the development of the type concerned, and the environmental factors likely to be affected by the development. The purpose of the scoping opinion is to identify those matters requiring assessment as part of the preparation of an Environmental Impact Assessment Report (EIAR).

Any EIAR submitted in support of a planning application in respect of the above development should have regard to the responses of consultees to the scoping process, (details of which are attached to this opinion).

The EIA Scoping report as submitted is fairly comprehensive and already includes some of the information that would require to be incorporated within an EIAR.

The nature of this particular proposal will require:

Consideration of alternatives and site selection- The current Regulations require that all EIARs should include an outline of the main alternatives studied (Schedule 4, Paragraph 2) and indicate the reasons for choosing the selected option. This will not only be the case in terms of site selection, but some consideration of alternatives will also be required in relation to site layout and other design considerations.

An explanation of site selection should be influenced by all those factors considered of particular relevance to this location, including operational considerations, nature conservation, hydrological considerations and landscape and visual considerations

Cumulative impacts – The proposed site is close to a number of operational sites operated by the developer and another operator as identified at Table 3.2 of the Scoping Report. The EIAR should incorporate a plan at an appropriate scale detailing each of the sites detailed in Table 3.2 and the relationship of the proposed site with each of these existing sites. There is likely to be a cumulation of effects on a number of the issues detailed below and these should be addressed as appropriate through the EIAR

Benthic Habitats and Species - A significant environmental effect is likely contrary to the view expressed in the scoping report. The EIAR should include an assessment of potential changes to benthic environment (habitats and species); (please refer to SEPA, MSS AND NatureScot consultation responses for detailed scope); The information required is summarised as follows:

- Seabed surveys (visual and benthic) to assess the suitability of the location, which the applicant states are yet to be undertaken.
- SEPA have determined at CAR pre-application that due to the size of the proposal marine modelling is required, including potential cumulative effects with neighbouring fish farms.

SEPA strongly recommend that any survey work is carried out as per SEPA guidance on our website dated May 2022 and advise that while the following information has been submitted, it will be evaluated as part of the EIAR with the Planning application:

- NewDepomod modelling to determine biomass and quantities of infested sea lice medicine
- BathAuto modelling to determine the quantities of bath sea lice medicines

NatureScot seek

- Depositional maps of waste and chemical chemotherapeutics
- Benthic seabed survey and supporting report to include an assessment of the significance of any impacts upon PMF habitats and species that the visual survey identifies both within and immediately beyond the depositional zone.

Water environment – SEPA note that an ECE report has been provided to determine potential for nutrient enrichment and will be evaluated as part of the EIAR with the Planning application:

It is accepted that these effects are unlikely to be significant.

Wild Salmonids - The EIAR should assess the risk posed to wild fish species from escapes, disease and sea lice.

Details of containment (including analysis of wave climate and suitability of 200m cages for the exposed conditions), stocking details, escape management measures, and any anticipated residual consequences in respect of wild fish interests should also be detailed. (See detailed responses by MSS and the WIDSFB and in particular the need to consider cumulative effects with other operational sites (Gravir, Tabhaigh, North Shore and Caolas a Deas) and how containment and an EMP can provide protective measures. The EMP should address management and monitoring measures in a multi-operator environment.)

In particular, an assessment of the impact of and measures to control sea lice will be required. An Environmental Management Plan (EMP) shall be submitted outlining how potential interactions with wild salmonids will be assessed. 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. The EMP should include a regular review process to ensure that it remains fit for purpose. A commitment to end of production cycle meetings and / or reports should also be given. The EMP should be informed by the review of the current measures in place for the prevention, control and reduction of parasites throughout the complete production cycle at the Gravir site. This would be useful in understanding how the substantial increase in biomass proposed in the area from the proposed new site will be managed without increasing the risk to effective sea lice management in the wider FMA and ensuring satisfactory measures remain in place for the prevention, control and reduction of parasites.

Nature Conservation and interactions

The Development lies within the boundary of the [Inner Hebrides and the Minches SAC](#), which is designated for harbour porpoise (*Phocoena phocoena*). The waters of The Minch are also frequently used by other European Protected Species (EPS) of cetacean including minke whale, bottlenose dolphin, risso's dolphin, and common dolphin. The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") or, for reserved matters, the Conservation of Habitats and Species Regulations 2017 as amended apply.

At a greater distance lie the boundary of the St Kilda- Special Protection Area (SPA), the North Rona & Sula Sgeir - Special Protection Area (SPA) and the Sule Skerry and Sule Stack Special Protection AREA (SPA) each designated for various bird species including Breeding gannets. Breeding gannets have a mean foraging range of 120.4km (± 50.0 km) and a mean maximum foraging range of 315.2km (± 194.2 km). (Woodward et al., 2019). Consequently, while significantly distant from the site, there is potential connectivity between gannets from one or more of these SPAs with the nets on the proposed finfish site.

Gairbh-Eilean Ronaigh Seal Haul-Out (HOS) site is located 5.13 km to the north northwest of the Development. Grey seal forage up to 100 km from HOSs, whilst common seal typically range between 40 and 50 km when foraging; therefore, it is possible that seals from the Gairbh-Eilean Ronaigh HOS and the other slightly more remote HOSs, could interact with the Development

The EIA should include details on:

- details of the make and model of any Acoustic Deterrent Device (ADD) and deployment and management arrangements intended to limit their use Number of transducers used;
- - Details on frequency, source level and the system (aggregate) duty cycle.
- Cumulative effects with neighbouring sites using ADD
- Mitigation measures for the Likely Significant Effects (LSE) to: migratory and resident populations of harbour porpoise (*Phocoena phocoena*),
- Mitigation measures for the Likely Significant Effects (LSE) to Gannets from above SPAs – (to follow NatureScot Standing advice: [Interim Technical Briefing Note - Pole-mounted top nets and birds at finfish farms](#))
- Mitigation measures for disturbance or interaction with harbour seal (*Phoca vitulina*) and grey seal (*Halichoerus grypus*) from Seal Haul-Out Sites within foraging range.

White-tailed eagle

A White-tailed eagle (WTA) nest is located c300m from the proposed fish farm. WTA are protected under Annex 1 of the EC Birds Directive and Schedule 1A of the Wildlife and Countryside Act 1981, as amended. These birds can be particularly sensitive to disturbance during the breeding season (February to August inclusive). While white-tailed eagle are known to nest in close proximity to established fish farms tolerance to such activities varies from pair to pair. It is up to the developer to ensure that their activities do not cause disturbance and ultimately an offence under the Wildlife and Countryside Act 1981 for this Schedule 1A species.

Impacts upon WTE should be scoped in to the EIAR and considered in terms of potential impacts, including disturbance, during installation and operation.

The following information should be supplied with any planning application:

- An assessment of current levels of water based human activity in the area, what additional activity the farm would bring and how this might effect the breeding pair.
- Measures proposed to reduce disturbance which may require to include a commitment to avoid the breeding period for the installation of the farm (Feb-July inclusive).
- Careful consideration should also be given to when fish are delivered particularly if this is done by helicopter.

Further advice is available from Nature Scot and the RSPB, Area Manager, North Highland and the Hebrides (Kenna Chisholm kenna.chisholm@rspb.org.uk Tel 07845 248410

Priority Marine features

Per SEPA, there are records of the following Priority Marine Features (PMFs) within 3km of the fish farm:

- Tall Sea Pen
- Basking shark
- Grey seal
- Harbour seal
- Risso's dolphin and
- Sandeels.

Survey work should be carried out as per SEPA guidance (dated May 2022).

The final environmental report should include a survey report and an assessment of the significance of any impacts upon PMF habitats and species that the visual survey identifies, as well as any which are known to be present close by but outwith the allowable mixing zone. In addition, the applicant should provide modelling outputs to identify the depositional footprint of waste and chemicals for the proposed site. Where possible these should be overlaid with the locations of any PMF habitats that may have been identified by the visual survey. Advice should be sought from NatureScot as to the status of the PMFs in the vicinity.

Landscape, Seascape and visual impact

Based on the advice of NatureScot it is concluded that agreed that the Development is likely to have a significant effect on landscape, seascape, and visual resource of the local area and that a full landscape and visual impact assessment (LVIA) is carried out with representative viewpoints. A ZTV of high quality resolution should be generated to inform suitable viewpoints for use in the LVIA.

The LVIA should include consideration of aspects of the development, such as feed barge, raft, underwater lighting and buoys as well as the cages. Impacts on the Wild Land area to the west and south should be carefully considered as part of the LVIA.

Conflict with other marine users – The assessment should consider potential conflict with established marine users and should detail the outcome of consultation with representative bodies, notably RYA, NLB and WIFA and the Outer Hebrides Regional Inshore Fisheries Group. The area covered by the Outer Hebrides RIFG covers inshore waters from baselines between the Butt of Lewis and Barra Head. The sea out from St Kilda, the Flannan Isles, North Rona, and Sula Sgeir is also included within the Group's geographical scope. The Group operates an Executive Committee of catching sector representatives and an independent Chairman and is responsible for the Group's Fisheries Management Plan, with the assistance of an Advisory Group of stakeholders from Government Agencies and a wide range of other Organisations with an interest in the Marine Environment. The applicant should seek to design the proposal in a way that minimises impacts on navigation and on other marine users including local inshore commercial fishing interests.

Commercial Fisheries/ Economic considerations – The assessment should identify direct and indirect benefits associated with procurement, construction and operation of the site including consequences for the viability of the business and the maintenance of employment and the creation of new job opportunities. Any assessment should include the displacement effects upon inshore fishery activity.

Contrary to Para 3.6.2, fishermen operating in and around the area maintain that prior to submission of the Scoping Report to the planning authority that no local pre-application discussions took place with the sector and that the proposed site is heavily fished by smaller scale inshore fishing craft as well as larger trawlers who work along the minch coast.

Areas of seabed in the near vicinity are used by scallop, nephrops and crab and lobster fishing. For fishing, see the following publications for info and data: [Supporting documents - Scottish Sea Fisheries Statistics 2021 - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/statistics/2021/scottish-sea-fisheries-statistics-2021/pages/1-introduction.aspx) & [UK sea fisheries annual statistics report 2021 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-sea-fisheries-annual-statistics-report-2021)

Operational measures

Waste Management (Non-fish) – It is noted that Site-specific waste management is covered with the internal and external EMS audits, for operational sites and it is agreed therefore this element will be scoped out of the final assessment

Waste Management (Fish) Moribund and dead fish waste – The scoping report is silent on waste

generated by fish mortalities. Given the large biomass proposed at the site, fish mortality management has the potential for localised significant effects in the event of inadequate management, transport and disposal methods to a licenced site(s).

A specific waste management plan should be provided detailing the arrangements for fish waste including, handling, transportation methods, frequency and provide details of licenced waste management sites and details of the environmental management systems in use at these sites. Fish Waste disposal sites should be listed in hierarchical order of use and include those that are options for use in the event of mortalities from a major disease outbreak.

Pier and shorebase – it is noted that there are options to either extend the existing shorebase at Gravir or have a floating ‘shorebase;; further details should be provided of the solution proposed and how it is expected to mitigate the impacts upon other users of the pier and public road serving the shorebase including parking, manoeuvring and exiting the site in a forward gear.

Other operations - Details of stocking, fallowing, working procedures and practices and contingencies should be documented, to demonstrate how effects upon the receiving environment will be minimised. An escapes prevention and contingency plan and predator control plan should be submitted along with details of containment measures tailored to site-specific conditions, including appropriate manufacturer and moorings attestations.

Impacts upon population and Human Health

It is agreed that the Development is unlikely to have a significant negative impact on human health and therefore the topic can be scoped out from further assessment.

Impacts upon marine or terrestrial cultural heritage

The developer is encourage to engage direct with the Comhairle Archarology Service re the protocol for It is agreed that the Development will have no significant negative impact on marine or terrestrial cultural heritage human and that therefore the topic can be scoped out from further assessment

Structure of the document – the EIAR is to focus on elements likely to have ‘significant’ consequences for the receiving environment. Other issues with lesser importance should be addressed in summary to indicate that they have been considered. Short-term and long-term consequences should be identified with an indication of expected degree of magnitude and any mitigation measures advanced along with the degree of confidence as to the efficacy of such measures. In accordance with the requirements of the Regulations, the EIA should be accompanied by a non-technical summary of the issues addressed in the main document.

Mitigation and Monitoring – the EIA should conclude with a schedule of mitigation measures arising from the analysis of the various topics reviewed. This should also indicate the means by which the delivery of that mitigation is to be assured, including any management or monitoring required to ensure that will be the case.

Habitats Regulations Appraisal (HRA) and information needed to support HRA

The SAC and SPA sites are correctly identified and Shadow HRA/AA is welcomed to support the EIAR.

MARINE SCIENCE SCOTLAND ABERDEEN**Benthic Impacts**

DEVELOPER STATUTORY CONSULTEE MSS

As a new site benthic impacts should be assessed. The modelling report submitted by the applicant indicates that the cage arrangement and modelled biomass of 4680 tonnes may be acceptable at the site. No further information is required provided any future planning application is based on the details described. Appropriate documentation should be submitted with any future planning application / Environmental Report along with appropriate modelling demonstrating the acceptability of the proposal.

Water Column Impacts

DEVELOPER STATUTORY CONSULTEE MSS

The proposed site sits out-with any Locational Guidelines categorised area. The applicant has submitted a nutrient assessment based on a proposed biomass of 4680 tonnes which shows that the resulting impacts should not be unacceptable. The cumulative assessment has taken into account the biomass from 2 additional sites in the vicinity of the proposed site and indicate that the resulting impact should not be unacceptable. The assessment should be submitted with any future planning application / Environmental Report.

Interaction with Wild Salmonids

DEVELOPER STATUTORY CONSULTEE MSS

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:

<https://www.gov.scot/publications/summary-of-information-relating-to-impacts-of-salmon-lice-from-fish-farms-on-wild-scottish-sea-trout-and-salmon/>

There are currently four other active sites within 15 km of the proposed location, as such cumulative impact factors may come into play.

The proposed site location is adjacent to the Eishken Estate. It is noted that the Eishken Estate has a proposed grading of grade 3 for the upcoming fishing season in 2022. With a grading of 3 the Eishken Estate 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-for-2022-season/>

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 appended summary webpages 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.

The Scottish Salmon Producers Organisation (SSPO) publishes Fish Health Management Reports providing average lice counts for an area, more recent reports include monthly lice counts for each farm. The reports can be found at the following web address:
<https://www.salmonscotland.co.uk/reports>

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 as part of the local FMA (area W-4). They undertake to follow the practices recommended in the industry CoGP regarding containment and sea lice control, with the criteria for treatment set at 0.5 adult female *L. salmonis* per fish (1st February - 30th June) and 1 adult female *L. salmonis* per fish (1st July - 31st January) and a target of zero adult female lice in the spring.

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.

EMP

The applicant has 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. 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.

The supplied EMP includes the criteria mentioned above.

The applicant has indicated that they intend counting sea lice stages on wild salmonids. The collection of wild salmonids is a regulated procedure and the applicant needs to obtain necessary permissions to conduct this activity with a specific achievable objective. Sea lice on wild fish are likely to be obtained from multiple sources, including other nearby farms. The applicant appears to be aware that wild fish sampling will generate data that could only be used to inform on general environmental sea lice loads.

Sea lice efficacy

The applicant has provided the output from chemical modelling based on the proposed equipment and biomass of 4680 tonnes. Modelling results indicate that the quantities of the chemotherapeutants deltamethrin and azamethiphos may be available in sufficient quantities to allow the treatment of 6.8 cages/3hrs and 1 cage/24hrs respectively. We would request that confirmation be provided of the maximum biomass that can be treated with the quantity of in-feeds modelled / likely to be consented at the site. This information along with the associated modelling should be submitted with any future planning application / Environmental Report.

AQUACULTURE ANIMAL HEALTH

Site Location

There are currently no sites registered with Marine Scotland Science within 1000m of the proposed new site (see map on page 9).

To the knowledge of the FHI, there are currently no sites proposed in the planning system within 1000m of this proposed new site.

It should be noted that all measurements are taken from the mid point of site coordinates.

Site Access

The location of the proposed site appears to be exposed to the east/north east. The Modelling report confirms that the site is exposed to significant sea swell to the north east, with significant fetch through the North Minch to the NE Atlantic. Details on the assessment made on equipment suitability based on this environmental data should be provided (further details in 'Containment section').

The applicant state that the site will be accessed by boat from the existing Gravir shorebase. Information should be provided regarding how the site will be serviced during inclement weather conditions to ensure that the health and containment of fish on site is not compromised by the location; with reference to the availability of suitable boats for access and ability to perform husbandry tasks in an exposed location and with bigger pens and details of any technologies that may be utilised to aid remote observation of the site.

Authorisation

The Scottish Salmon Company already possess authorisation to farm at their existing sites. However, an amendment to this authorisation must be sought to include any newly approved or acquired site, prior to the commencement of farming operations at the new site.

Disease Management Area

The position of the site falls within disease management area 5a and as such will have an impact on or be impacted upon by sites within the E Lewis disease management area as currently defined in Marine Scotland disease management area maps, available online <https://www.gov.scot/publications/fish-disease-management-areas>. This is a multi-operator area; it is 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 Density

From the information given in the application, the operation of the sites will be at an acceptable stocking density level of below 22kg/m³.

Husbandry

The Predator Control Plan details that mortalities will be removed from pens using a lift up system. Details of the frequency of removing mortalities and how mortalities will be disposed of should be submitted. The 200m pen is larger than any pen currently in use in the Scottish aquaculture industry, and difficulties may be encountered conducting husbandry operations in such large pens. Further information on operating with 200m pens should be provided as detailed in 'Containment'.

Sea Lice

The proposed site is situated out with current farm management area (FMA) boundaries. The nearest FMA is W-4 which currently includes 1 active site, Gravir (FS0242), which is operated by the applicant. Information provided states these sites will be operated in synchrony within FMA W-4 in terms of fallowing, stocking and harvesting and also 'coordination' of sea lice treatments. The existing Gravir site provides a useful indication of sea lice history and sea lice management in the area. During the most recent production cycle in 2021 numbers of adult female *Lepeophtherius salmonis* were above the MS increased monitoring level of 2 intermittently during the last 9 months of the production cycle and also above the CoGP suggested criteria for the vast majority of this period; 2 of these weeks were also over the MS intervention limit. Treatments were applied, including physical treatments and freshwater baths and stock responded to these treatments, but numbers did not fall below the CoGP suggested criteria and an advisory letter was issued by Marine Scotland in November 2021. This letter advised the applicant to undertake a documented review of the current measures in place for the prevention, control and reduction of parasites throughout the complete production cycle at the Gravir site; identifying specific actions, resources, husbandry decisions or options and logistics required to ensure that satisfactory measures are in place for the prevention, control and reduction of parasites. Details of the outcome of this review would be useful in understanding how the substantial increase in biomass proposed in the area from the proposed new site will be managed without increasing the risk to effective sea lice management in

the wider FMA and ensuring satisfactory measures remain in place for the prevention, control and reduction of parasites.

The Environmental Management Plan provided gives an overview of the sea lice management strategies available to the site to ensure satisfactory measures for the prevention, control and reduction of parasites are in place; further details are also included in the Screening/Scoping Report and Modelling Report; additional specific details are requested as outlined below.

Sea lice monitoring is undertaken with counts conducted from 10 fish from every stocked pen. Criteria for implementing intervention following sea lice counts is more stringent than the proposal in the CoGP (0.5 adult female Feb-June and 1 adult female July-Jan) at a threshold of 0.5 adult females applied all year. This is based on current knowledge of lice moult rates and allows ample time for treatment planning and resource allocation. A suitable intervention will be chosen from the available management measures (table 4, EMP) in accordance with the integrated sea lice management plan (figure 4, EMP); the applicant states that biological control and physical treatments are favoured with an aim to reduce medicinal treatments. Ultimately, the site would be depopulated if all prior interventions had proven unsuccessful.

The screening and scoping report states that cleanerfish species, either lumpsuckers or wrasse are proposed to be stocked on site. Health screening occurs prior to transfer and staff are trained in health and welfare to care for cleanerfish on site. Details of the sources of cleanerfish should be provided to assess if an adequate supply of cleaner fish for the purpose of effective biological control can be obtained. Details should also be provided of the stocking strategy for cleanerfish e.g. point in cycle of stocking and ratios.

Freshwater treatments are listed as a strategic and reactive treatment, primarily used for treatment of Amoebic Gill Disease, but also an effective tool in reducing lice numbers. The applicant state that treatments will take place onboard a wellboat and that two dedicated freshwater vessels have currently been added to their fleet, using reverse osmosis technology eliminating the need for a freshwater abstraction source. However, as this site proposes to stock cleaner fish; extended freshwater treatments may not be suitable or may create additional logistic challenges in administering treatments. Research suggests that lumpfish appear tolerant of freshwater exposure in bath treatments for 3-5 hours, however longer treatment times or use of wrasse may require the cleaner fish to be removed prior to the treatment being conducted. During the 2021/2022 production cycle at the nearby Gravir site total mortality of all cleanerfish on site was experienced following freshwater treatments. Further information is sought on considerations to cleaner fish health and welfare and improvements that have been made, including details of proposed procedures for removing cleaner fish prior to freshwater treatment to minimise cleaner fish mortality during freshwater treatments.

Physical removal methods such as hydrolicing and thermolicing are also available to site. The applicant state that they have recently increased their capacity of hydrolicers, therefore improving their response time to infestation pressures. Further information on time taken to treat the sites with these methods should be provided.

The modelling report states quantities of chemotherapeutants expected to be permitted for use on site. In terms of expected permitted quantities the site could be treated with Deltamethrin in 1 day or 5 days with Azamethiphos. An efficacy statement should be provided detailing how the permitted quantities are proposed for use on site, the method of their application and a timeframe for the practical application of bath treatments of chemotherapeutants.

Difficulties may be encountered conducting sea lice treatments in such large pens. Further information on use of 200m pens should be provided as detailed in 'Containment'.

Containment

The proposed contingency plan for dealing with an escape or suspected escape event is satisfactory.

The information provided on equipment and strategies in place to minimise predator interactions at the site in question is satisfactory as far as can reasonably be foreseen, tensioned top netting will inhibit entry from aerial predators and strong rigid HDPE pen nets highly tensioned with sinker tubes and possibly seal blinds at base will be used to prevent predation from seals. A wildlife log will be kept of sightings to increase knowledge of local and seasonal trends at the new site along with details of any entanglements or interactions with pens. Regular mortality removal will also be

practiced. Any use of ADD's will be in line with the requirements of Marine Scotland Licensing Operations Team.

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. 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 should be noted, that whilst the implementation process for 'A Technical Standard for Scottish Finfish Aquaculture' (STS) is still being delivered; due to the costs and timeframes involved in aquaculture site development, the industry should be working towards meeting the guidance provided within the STS to ensure compliance when implementation occurs, further guidance on STS can be viewed online <https://www.gov.scot/publications/technical-standard-scottish-finish-aquaculture/>.

The 200m pens proposed are larger than any pens currently in use in the Scottish aquaculture industry. Further to evidence of equipment suitability for the environment; information should also be provided to support the use of such large pens considering the potential impacts on procedures and detailing the infrastructure in place and availability of suitable equipment - boats, winches, tarpaulins and staff to allow husbandry operations and any treatments or sea lice interventions required to take place efficaciously without any increased risk to the success of these procedures or to the containment of fish on site. Details of knowledge and experience of staff in working with pens of this size or proposed training should also be provided.

For information: Operations and records on site must meet the requirements of The Aquatic Animal Health (Scotland) Regulations 2009, The Aquaculture and Fisheries (Scotland) Act 2007, The Fish Farming Businesses (Record Keeping) (Scotland) Order 2008, The Fish Farming Business (Reporting) (Scotland) Order 2020 and The Aquaculture and Fisheries (Scotland) Act 2013. Compliance with this will be inspected during routine visits by the Fish Health Inspectorate.

Contact name: Anna Donald, Marine Scotland Science

Telephone number: 0131 244 4013 Email: anna.m.donald@gov.scot

Our advice as to your Screening opinion is summarised as: An EIA is required, however it is noted that the applicant has provided some of the environmental information that would be requested.

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

- o Suitable benthic modelling demonstrating the acceptability of the proposal - see comment in full.
- o Appropriate nutrient enhancement modelling and full details of the calculation - see comment in full.
- o The maximum biomass that can be treated with in-feeds modelled / likely to be consented at the site without breaching EQS. Information provided at the planning stage should take into account SEPA's most up to date information on the use of emamectin benzoate and any effect this may have on the quantities 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, taking into account the relevant EQS.

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

- o Details of maintaining access and servicing the site in inclement weather conditions.
- o Frequency of mortality removal and disposal method for mortalities; reference to ability to conduct procedures in 200m pens.

- o Further details of the sea lice management plan for the site and FMA as detailed above including details of conducting treatments in 200m pens.
- o Site specific evidence of the suitability of the proposed equipment (nets, pens, moorings).
- o Considerations of impacts of working with 200m pens on operational procedures; including detailing the infrastructure in place and availability of suitable equipment and details of knowledge and experience of staff or proposed training.

WESTERN ISLES DISTRICT SALMON FISHERIES BOARD

The WIDSFB have serious concern there will be a significant effect on wild fish due to the size and location of this development. Our comments relate to Interactions with Wild Salmonids.

The scope of the report is not adequate to assess impacts that are likely to effect wild salmonids. Further information and explanation from the developer is required on the following points.

- Another operator (MOWI) is providing wild fish monitoring in the form of the Loch Erisort EMP for their North shore and Tabhaigh sites. If the proposed North Gravir site goes ahead lice found as part of any EMP wild fish monitoring could be farm derived and have originated from any of three sites operated by two different companies.
- The developer (Scottish Salmon Company) should provide further information of how it would differentiate between lice found on wild fish. In essence how would the developer identify the source of sea lice being recorded. If this cannot be achieved and Comhairle nan Eilean Siar as the local planning authority grant permission with an associated EMP they would create a planning condition that is both unworkable and fails in its fundamental aim. One of the core principals of an EMP is to provide feedback to management should monitoring indicate an impact on wild fish. Scottish Salmon company have stated in the EMP that "Where this EMP is implemented by means of a Planning Condition, this provides the LPA with enforcement capabilities to ensure adherence by SSC to the environmental management commitments detailed within the EMP."
- If the developer plans to only gather general data on lice burdens impacting wild salmonids, then it should make clear under the EMP what provisions it has with other operators to take synchronised management actions across all sites (North Gravir, Tabhaigh and North Shore) up to and including depopulation. This may require a joint EMP with SSC and MOWI covering all three sites to ensure management action is proportionate and fair for both operators in the area.
- The proposal creates significant potential for a cumulative impact across farm management areas (W3 and W4). Therefore, detailed information should be provided in the form of Sea Lice Dispersal modelling. Outputs from Sea lice dispersal modelling should include.
 - Analysis for a full production cycle.
 - Analysis alongside existing sites SSC - Gravir and MOWI - North Shore, Tabhaigh.
- Given that sea lice numbers were persistently above CoGP levels during the last production cycle for the existing Gravir site WIDSFB would appreciate further information as to how the significant biomass (4680t) proposed at North Gravir will be managed without increasing the risk in what appears to be a challenging area for effective sea lice management.
- SSC have made the assertion that "not all juvenile salmonids leaving will be vulnerable to any additional risk due to the fact the farm is on exposed coast and not located within a sea loch." Has the developer considered this statement in relation to the 2021 results of the west coast tracking project?

SCOTTISH ENVIRONMENT PROTECTION AGENCY (SEPA)

Screening opinion

The proposed development will be likely to have a significant effect (in the context of the Regulations) on the environment by virtue of its nature, size or location and therefore an EIA is required.

Scoping Opinion

Benthic habitats - Applicant states in 2.2.3 of S/S report that the seabed is predominantly circalittoral sandy mud. SEPA currently holds no further information on this location

Modelling report states a peak biomass of 4680t would be permitted (but this has yet to be verified by SEPA modellers)

Water column - ECE report submitted.

Shellfish interests - There are no Shellfish Water Protected Areas (SWPA) or Shellfish Harvesting Areas (SHA) within a 3km search radius of the site.

Natural heritage interests - The proposed farm would lie within

- The Inner Hebrides and the Minches SAC, the protected features of which are Harbour porpoise.
- 4.5 km of the North East Lewis MPA, the protected features of which are Marine Geomorphology of the Scottish Shelf Seabed, Quaternary of Scotland, Risso's dolphin & Sandeels.
- There are records of the following PMFs within 3km of the fish farm: Tall Sea Pen, Basking shark, Grey seal, Harbour seal, Risso's dolphin and Sandeels.

Mobile features not considered to be at significant risk from discharges from fish farm

MS locational guidelines - Uncategorized

WFD classification - Rubha na Creige More to Gob Rubh Uisinis (200179) has been classified as Good status in 2020.

Other users - There are 2 licenced finfish farms within 2 km to the southwest of the proposed site - Gravir Outer & Gravir West

SEPA are in general agreement with what the applicant proposes to screen in (and out) of their EIA.

In particular, we would require the following information in support of this application:

- Seabed surveys (visual and benthic) to assess the suitability of the location, which the applicant states are yet to be undertaken.
- SEPA have determined at CAR pre-application that due to the size of the proposal marine modelling is required, including potential cumulative effects with neighbouring fish farms.

The following information has been submitted but will be evaluated as part of the ES with the Planning application:

- NewDepomod modelling to determine biomass and quantities of infeed sea lice medicine
- BathAuto modelling to determine the quantities of bath sea lice medicines
- An ECE calculation to determine potential for nutrient enrichment.

We strongly recommend that any survey work is carried out as per SEPA guidance on our website dated May 2022.

Advice should be sought from Nature Scot as to the status of the PMFs in the vicinity.

NATURESCOT

Scoping advice

Benthic impacts

We do not hold any existing biotope data around the area of the proposed site. In order to establish whether there are likely to be any significant effects on benthic species or habitats of conservation importance, a baseline visual seabed survey is required. This should be in accordance with SEPA's most up to date guidance on baseline visual surveys for aquaculture. Visual images should be of a satisfactory resolution to enable the identification of habitats and species present. In line with guidance the survey extent should reflect potential scale and direction of flows of waste and chemical residues from the immediate farm footprint. Ideally survey design should be sufficiently flexible to enable the extent of any biogenic features detected to be assessed.

The final environmental report should include a survey report and an assessment of the significance of any impacts upon PMF habitats and species that the visual survey identifies, as well as any which are known to be present close by but outwith the allowable mixing zone. In addition, the applicant should provide modelling outputs to identify the depositional footprint of waste and chemicals for the proposed site. Where possible these should be overlaid with the locations of any PMF habitats that may have been identified by the visual survey.

Interaction with predators

We note the proposed use of tensioned nettings, the potential use of seal blinds and frequent retrieval of morts as the first and principle methods of preventing seal attacks on farmed fish. Comments on the potential use of ADDs are provided in section 5 below.

We have also provided comment below on the use of pole mounted top nets in relation to SPA's for Gannets.

Interaction with Wild Salmonids

We welcome the multiple non-chemical steps being taken to control lice with the Sealice Management Plan at this site and the measures being taken within the escape and containment plan. We do not require any further information to what has been provided.

Impacts upon species or habitats of conservation importance, including Sensitive Sites

Inner Hebrides and the Minches Special Area of Conservation (SAC) and EPS cetaceans.

The proposal lies within the Inner Hebrides and the Minches Special Area of Conservation (SAC) designated for its harbour porpoise (*Phocoena phocoena*). More information on this SAC can be found at: Inner Hebrides and the Minches SAC The waters of The Minch are also frequently used by other European Protected Species (EPS) of cetacean including minke whale, bottlenose dolphin, risso's dolphin, and common dolphin.

The site's status means that the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the Habitats Regulations) or, for reserved matters, the Conservation of Habitats and Species Regulations 2017 as amended apply. Consequently, Comhairle nam Eilean Siar is required to consider the effect of the proposal on the SAC before it can be consented (commonly known as Habitats Regulations Appraisal). The NatureScot website has a summary of the legislative requirements (The Habitats Directive and Habitats Regulations).

The typical frequencies of Acoustic Deterrent Devices (ADDs) are within the hearing range of harbour porpoise. A significant body of evidence exists to suggest that in some instances ADDs can result in the disturbance and displacement of harbour porpoise. If ADDs are deployed and activated at this site, as has been suggested in the predator control plan, this will result in a Likely Significant Effect on the harbour porpoise feature of the Inner Hebrides and Minches SAC and therefore information will need to be supplied to enable an Appropriate Assessment. All cetaceans are protected under EPS legislation, and under Regulation 39(2), an EPS licence for disturbance is required if there is the risk of disturbance to a single individual. No ADDs can be deployed until an application for an EPS licence has been determined by Marine Scotland - Licensing Operations Team (MS-LOT).

As part of the EPS licence process MS-LOT will be required to carry out a HRA before issuing an EPS licence, unless they conclude that the deployment of ADDs is not capable of resulting in any disturbance of harbour porpoise. Any EPS license application will require at a minimum:

- Make/model of chosen system;
- Number of transducers used;

- Details on frequency, source level and the system (aggregate) duty cycle.

MS-LOT will be required to assess potential impacts including cumulative as part of their consideration of any EPS licence application. Until further details are available regarding the type and number of ADDs proposed and the methods and duration of activation / deactivation it will not be possible to assess the potential impacts. Full information on the required assessment process is available in the Marine Scotland guidance.

Due to the length of time required for a license assessment, we recommend that the assessment and EPS application for the ADD system of choice be done at the same time as the Planning Application, using the Marine Scotland guidance. The assessment conducted for the EPS licence process is the evidence level also required for our advice in terms of the Planning Application. The information for our assessment should also include detail of any overlap of ADD system usage both in time and in space, and the cumulative disturbance ranges and cumulative number of disturbed animals.

We recommend that an underwater acoustic specialist conducts underwater noise modelling, using the chosen ADD system's acoustic characteristics to estimate area of disturbance. From which, the number of animals disturbed can be predicted. It should be specified what the number of individuals predicted relates to (most likely - to one noise emission). Alternatively, a general assessment can be done using the generalised ADD types as presented in the Marine Scotland guidance. Additionally, the cumulative assessment will need to include consideration of all existing fin fish farms in the area.

In the first instance the applicant should consider if it is possible for the site to be operated without the use of ADDs. This should include consideration of the alternatives and should be presented in the planning application/environmental report (EIAR).

Gannet SPAs and pole-mounted top nets

We note that pole-mounted top nets are proposed with 100 mm mesh size. These appear to be 7m and there may need to be other changes to accommodate the larger cages.

There are reports of an emerging threat to marine birds where significant numbers of gannets have become entrapped under and/or entangled within ceiling nets after plunge diving into cages from above. Under the Habitats Regulations, LPAs have a legal duty as the Competent Authority to consider the likely impact of any planning proposals, whether within or outwith an SPA, on the site's qualifying interests. In Scotland, there are eight breeding colony SPAs and two marine proposed SPAs for which gannets are a protected feature. Breeding gannets have a mean foraging range of 120.4km (± 50.0 km) and a mean maximum foraging range of 315.2km (± 194.2 km) (Woodward et al., 2019). Consequently, there is potential connectivity between gannets from SPA colonies and all marine waters across Scotland suitable for finfish aquaculture.

On the basis of best available current evidence, NatureScot consider that Likely Significant Effect (LSE) should be concluded with respect to gannet qualifying features of SPAs for all marine finfish farms involving deployment of pole-mounted top net systems with ceiling net mesh sizes of 200mm or greater. Risk of LSE for gannets is likely to be lower for smaller ceiling mesh sizes, particularly under 100mm, but cannot be ruled out, particularly in areas known to be regularly used by foraging gannets. NatureScot will provide advice in these instances, considering also other marine bird species. Where LSE is concluded, Appropriate Assessment is required. The following information should be provided with any planning application:

Details of proposed pole-mounted top net system including: numbers of pole supports per cage; supporting pole lengths and height above hand rails; side net/skirt mesh size(s); ceiling net mesh size; and, net colours.

Please ensure that the method of measurement of the mesh size is also quoted (different manufacturers quote this in various ways)

Any available existing data on bird entanglement at the site since the pole-mounted top nets were installed should also be provided.

White-tailed eagle

White-tailed eagle nest c300m from the proposed fish farm and are protected under Annex 1 of the EC Birds Directive and Schedule 1A of the Wildlife and Countryside Act 1981, as amended. These birds can be particularly sensitive to disturbance during the breeding season (February to August

inclusive). While white-tailed eagle are known to nest in close proximity to established fish farms tolerance to such activities varies from pair to pair. It is up to the developer to ensure that their activities do not cause disturbance and ultimately an offence under the Wildlife and Countryside Act 1981 for this Schedule 1A species.

The following information should be supplied with any planning application:

- An assessment of current levels of water based human activity in the area, what additional activity the farm would bring and how this might effect the breeding pair.
- Measures proposed to reduce disturbance. We advise that this should include a commitment to avoid the breeding period for the installation of the farm.
- Careful consideration should also be given to when fish are delivered particularly if this is done by helicopter.

Landscape and Visual Impacts

We advise that this proposal is likely to have significant effects on the surrounding landscape. We recommend that a full landscape and visual impact assessment (LVIA) is carried out with representative viewpoints. The LVIA should include consideration of aspects of the development, such as feed barge, raft, underwater lighting and buoys as well as the cages. We recommend that impacts on wild land should be carefully considered as part of the LVIA.

The developer is referred to our good practice guidance, 'Marine Aquaculture and the Landscape: the siting and design of marine aquaculture developments in the landscape, at <https://www.nature.scot/doc/siting-and-design-aquaculture-landscape-visual-and-landscape-considerations>

Contact name: Patrick Hughes Telephone number: 07881853627

Email: Patrick.hughes@nature.scot

Our advice as to information that should be included in an Environmental Statement, is summarised as:

This proposal is for a new fish farm on the east coast of Lewis. There are a number of potential impacts that need to be considered in the EIA report or supporting information accompanying any planning application.

The following should be provided:

- Depositional maps of waste and chemical chemotherapeutants
- Benthic seabed survey and supporting report to include an assessment of the significance of any impacts upon PMF habitats and species that the visual survey identifies.
- Effect of pole-mounted top nets on sea birds, especially gannets. Provide details of any previous seabird entrapment/entanglement at this site; details of proposed top net equipment and configuration. To inform HRA.
- Effect of ADD use on the porpoise feature of Inner Hebrides and the Minches SAC and on EPS cetaceans. Information as outlined above to inform HRA.
- White-tailed eagle provide assessment of effects to the adjacent nesting pair.
- The LVIA should include consideration of aspects of the development, such as feed barge, raft, underwater lighting and buoys as well as the cages.

HISTORIC ENVIRONMENT SCOTLAND

We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

We can confirm that there are no heritage assets within our remit, as listed above, within the proposed development area or its vicinity. We are therefore content for impacts on cultural heritage assets within our remit to be scoped out of the assessment.

Samuel Fox, phone 0131 668 6890 or email on samuel.fox@hes.scot.

BIODIVERSITY OFFICER

I have no comments on the significance of effects and scope of the EIA.

WESTERN ISLES FISHERMAN'S ASSOCIATION

Representatives from Scottish Salmon were invited to the Outer Hebrides Regional Inshore Fisheries Group meeting held on Friday 8 July 2022 to discuss the North Gravir site which had been submitted to CNES for a screening and scoping application.

Scottish Salmon had submitted the application without having had any previous discussions with any other marine stakeholders and had based their site identification on the site not having much other commercial use based on ScotMap and other VMS data to which they had access. Representatives from Scottish White Producers Association, who represent mobile vessels from across Scotland and in particular Mallaig and West of Scotland trawlers had met with Scottish Salmon a few days previously and had made clear that the identified site was of significant commercial importance over the past 50 years and would not offer support to any future salmon farming being located at that site.

It was established that ScotMap was 10 years old and had not been updated and that there had been significant changes to practices of under 12 metre vessels that had been contacted as part of that system. In addition, VMS data could not be accurately reflected as the system was based on a ping transmitted by a vessel every 2 hours and did not clearly identify where the vessel was actually fishing.

The Outer Hebrides Regional IFG was currently piloting a tracking system on 40 static gear vessels which provided accurate information on where vessels fished and the number of pots hauled in a day, this was being co-managed by Marine Scotland, St Andrews University and the OHRIFG, with the 2 year pilot concluding in November 2022. Marine Scotland had produced a first year report of the pilot which was available on their website. Individual vessel activity was not available for pursuit, unless the individual skipper wished to release such details, neither was any other information from vessel VMS systems as that information was protected through data protection. Marine Scotland officials did indicate that they are currently installing Remote Electronic equipment aboard all scallops including cameras and winch sensors, with some form of tracking devices expected to be fitted to all vessels by 2026. Those devices will provide information which can collectively indicate where fishing activity is taking place, but is not expected to be available on an individual basis.

Marine Scotland did confirm that Regional Inshore Fisheries Group were not statutory consultees for salmon farming developments at the moment. It was considered essential and a matter of urgency that there should be an early process when engagement with Marine users takes place to consider the economic importance of identified sites.

Vessel plotter tracks are available from individual skippers and provide accurate information of where the vessel fishes and highlights all the grounds fished, that information had been provided by one of the Stornoway skippers and had clearly showed the tracks that that vessel had used within the proposed site. The skipper did highlight that the tracks he used was similar to what other mobile vessels would use and vessel plotter tracks had been previously used by Marine Scotland and Nature Scot in amending boundaries for recent Marine Protected Areas.

The proposed North Gravir site was used by scallop dredgers in the shallower depths, with static gear vessels using the site for brown crab and prawns and prawn trawlers towing the deeper areas of the site. Skippers highlighted that the site was essential for vessels from a safety point of view in being able to haul gear during periods of bad weather as it offered shelter to enable vessels to haul their gear.

Representatives from MacDuff Shellfish highlighted that many skippers both local and mainland based had been in contact with them regarding the significant impact that loss to that site would have on their future landings, with MacDuff Shellfish representatives stating that it was vital that they continued to have access to trawled prawns and dredged scallops to provide steady supplies to their recently built £4.5M factory in Stornoway. The brown crab and creel caught prawns caught were essential for the range of vivier buyers that sell those shellfish on a sometimes daily and weekly basis to EU markets.

Scottish Salmon representatives required new sites to have easy access to their base in Lochs and were keen to develop a site North of Gravir towards the Stornoway area, with sufficient depth and tidal flow being required for new salmon farming techniques. Skippers present indicated that the area North from Gravir was extensively fished for generations for high quality shellfish and that it

would be extremely difficult to identify a site of the size they required. However, it was stressed that skippers would be approached to provide plotter information on where they fished in the area South of Stornoway.

NatureScot were asked whether there was any environmental restrictions on salmon farming taking place in the vicinity of the Shiant Isles, they had poor connections to the meeting and agreed to revert back on whether any restrictions did exist within that area. Some skippers present did indicate a high presence of vessels anchoring at Shiants and high fishing activity.

The problems with large volumes of debris around sites and onshore was highlighted as was the fact that derelict sites were not returned to their former state, with many anchors, predator nets, etc left behind on the seabed causing underwater obstructions.

The meeting concluded that it would be appropriate for early meetings taking place with the fishing industry to consider any future sites being considered for salmon farming developments so that early discussions could take place on how to best move forward to the mutual benefit of all users.

All fishing industry representatives at the meeting were unanimous in their objection to the proposed site being taken forward for salmon farming development, as it would have a significant negative impact on all sectors of the catching sector, coupled with the negative impact on onshore prawn and scallop processing plus the impact on the vivier trade from catches of brown crab and live prawns. In addition, they saw the treatments being used on the site have a huge impact on the survival of shellfish in a large geographical area around the large site being proposed.

Some additional information provided after the meeting was that the proposed site is just offshore from the nest of the oldest pair of white tailed eagles in the Hebrides, the site has a high success rate of raising chicks, with a 300 metre boat exclusion zone around the site and concern raised that constant disturbance from fish farm traffic and noise around the site could displace these birds from that site and have a significant impact on marine tourism.

NORTHERN LIGHTHOUSE BOARD

Thank you for your e-mail correspondence dated 22ndth June 2022 relating to the application submitted by The Scottish Salmon Company for consent to establish a fish farm consisting of 5 200m circumference pens and a feed barge at a new site on the East coast of Lewis, North of Loch Odhairn.

The Northern Lighthouse Board have reviewed the proposed location and recommend the following lighting and marking.

The site should be marked with 2 lit yellow Special Mark Poles fitted with a yellow 'X' topmarks.

The lights should display a character of flashing group four yellow every twelve seconds (Fl(4) Y 12s) with a nominal range of 2 nautical miles and be installed above the 'X' topmark.

The poles should be positioned at the North East and South East seaward corners of the cage group.

It is recommended that these be mounted onto the corner cushion buoys to give good visibility on approach to the site.

Poles should be _\$475mm diameter, the 'X' topmark should be _\$4 75cm length by 15cm width.

The feed barge should exhibit an all-round fixed white light with a nominal range of 2 nautical miles, which should be mounted at least 1 metre above any other obstruction. The light should be powered by a battery to ensure it operates independently of barge mains power.

A weekly check of the site's marking equipment shall be performed and records kept of its physical and working status for audit purposes.

Outlying anchor points should not be marked with buoys, unless specifically requested by local users, and alternative means to locate anchors should be utilised.

Loose floating lines around site equipment are strongly discouraged as this can cause serious safety implications for other mariners.

On completion of the development, the UK Hydrographic Office (sdr@ukho.gov.uk) must be notified and supplied with the mooring grid co-ordinates to enable the update of appropriate navigational publications.

ROYAL YACHTING ASSOCIATION (SCOTLAND)

I write to inform you that RYA Scotland has no comment that this wish to make at this stage.

CONSULTATION RESPONSES

CONSULTEE

Marine Science Scotland Aberdeen

(Date Consulted - 17 Jun 2022)

RESPONSE

Benthic Impacts - As a new site benthic impacts should be assessed. The modelling report submitted by the applicant indicates that the cage arrangement and modelled biomass of 3080 tonnes may be acceptable at the site. Confirmation of the proposed equipment and biomass should be submitted with any future planning application / Environmental Report along with appropriate modelling demonstrating the acceptability of the proposal. It is noted that there is a reference to a biomass of 2750.3 tonnes in table 4.4 of the submitted scoping report, however there are several documents included that state that the intended maximum biomass will be 3080 tonnes. Documents should be amended where appropriate and submitted with any future planning application.

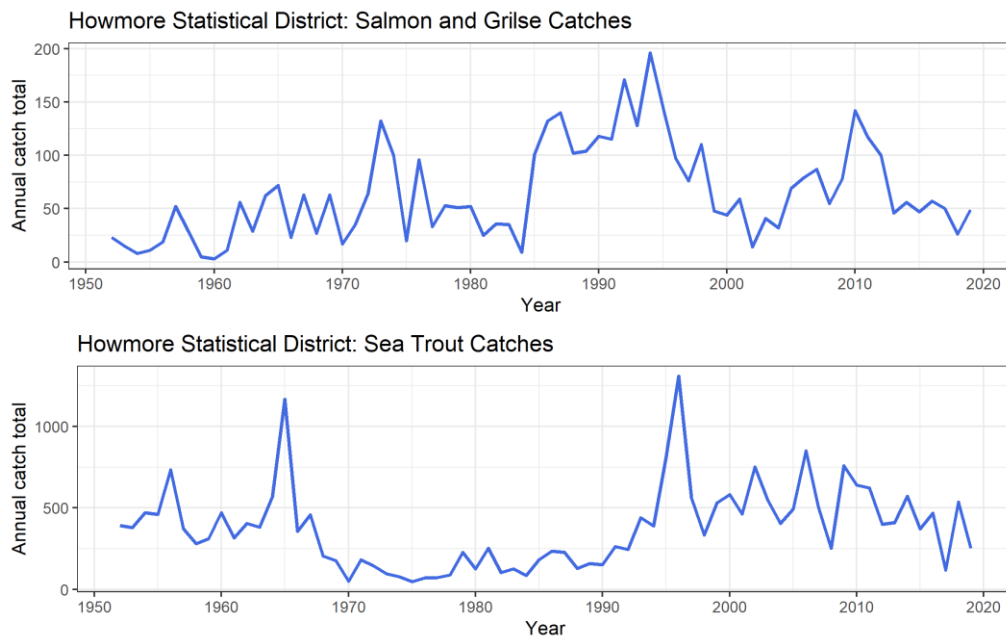
Water Column Impacts - The proposed site sits out-with any Locational Guidelines categorised area. The applicant has submitted a nutrient assessment based on a proposed biomass of 3080 tonnes which shows that the resulting impacts should not be unacceptable. The cumulative assessment has taken into account the biomass from 2 additional sites in the vicinity of the proposed site and indicate that the resulting impact should not be unacceptable. The assessment should be submitted with any future planning application / Environmental Report.

Interaction with Wild Salmonids - 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:

<https://www.gov.scot/publications/summary-of-information-relating-to-impacts-of-salmon-lice-from-fish-farms-on-wild-scottish-sea-trout-and-salmon/>

There are four existing sites within 15 km of the proposed site location, as such cumulative impact factors may come into play.

Benbecula is known to have fisheries for salmon and sea trout. The following graphs plot the rod catches for Atlantic salmon and sea trout from 1952 – 2020 in the Howmore statistical district within which the site will be located. As the Howmore statistical district covers the entirety of Benbecula 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 region. Data source: <https://data.marine.gov.scot/dataset/salmon-and-sea-trout-fishery-statistics-2020-season-reported-catch>



The proposed site location is adjacent to the Howmore and Loch Bi assessment area. It is noted that the Howmore and Loch Bi assessment area has a proposed grading of grade 2 for the fishing season in 2022. With a grading of 2 the Howmore and Loch Bi area has a 60-80% chance of meeting its conservation limit, meaning that the salmon stock in the river is bordering on a sustainable level. For more information on conservation limits and river gradings please visit: <https://www.gov.scot/publications/salmon-fishing-proposed-river-gradings-for-2022-season/#proposed%20river%20gradings%202022>

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 appended summary webpages 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.

The Scottish Salmon Producers Organisation (SSPO) publishes Fish Health Management Reports providing average lice counts for an area, more recent reports include monthly lice counts for each farm. The reports can be found at the following web address: <http://scottishsalmon.co.uk/category/farming/fish-health/>

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 as part of the local FMA (area W-15). They undertake to follow the practices recommended in the industry CoGP regarding containment and sea lice control, with the criteria for treatment set at 0.5 adult female *L. salmonis* per fish (1st February –

30th June) and 1 adult female *L. salmonis* per fish (1st July – 31st January) and a target of zero adult female lice in the spring.

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.

EMP

The applicant has 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. 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.

The supplied EMP includes the criteria mentioned above.

The applicant has indicated that they intend counting sea lice stages on wild salmonids. The collection of wild salmonids is a regulated procedure and the applicant needs to obtain necessary permissions to conduct this activity with a specific achievable objective. Sea lice on wild fish are likely to be obtained from multiple sources, including other nearby farms. The applicant appears to be aware that wild fish sampling will generate data that could only be used to inform on general environmental sea lice loads.

Sea lice efficacy

The applicant has provided the output from chemical modelling based on the proposed equipment and biomass of 3080 tonnes. Modelling results indicate that the quantities of the chemotherapeutants deltamethrin and azamethiphos may be available in sufficient quantities to allow the treatment of 4.6 cages/3hrs and 1 cage/24hrs respectively. We would request that confirmation be provided of the maximum biomass that can be treated with the quantity of in-feeds modelled / likely to be consented at the site. This information along with the associated modelling should be submitted with any future planning application / Environmental Report.

Other - Aquaculture Animal Health

Site Location

There are currently no sites registered with Marine Scotland Science within 1000m of the proposed new site (see map on page 10).

To the knowledge of the FHI, there are currently no sites proposed in the planning system within 1000m of this proposed new site.

It should be noted that all measurements are taken from the mid point of site coordinates.

Site Access

The location of the proposed site appears to be exposed to the east. The Modelling Report confirms that the site is exposed to significant sea swell to the north east, with a substantial fetch through The Little Minch to NW Scotland mainland. Environmental data for the proposed location and details on the assessment made on its suitability should be provided (further details in 'Containment section').

The applicant state that the site will be accessed by boat from the nearby Kallin Pier shorebase. Information should be provided regarding how the site will be serviced during inclement weather conditions to ensure that the health and containment of fish on site is not compromised by the location; with reference to the availability of suitable boats for access and ability to perform husbandry tasks in an exposed location and with bigger pens and details of any technologies that may be utilised to aid remote observation of the site. As the applicant operate other sites in the vicinity from this shorebase it may be useful to reference experience accessing and operating these sites.

Authorisation

The Scottish Salmon Company already possess authorisation to farm at their existing sites. However, an amendment to this authorisation must be sought to include any newly approved or acquired site, prior to the commencement of farming operations at the new site. **However, MSS would refuse authorisation to an Aquaculture Production Business (APB) to operate a site in this location under The Aquatic Animal Health (Scotland) Regulations 2009, should this result in a joining of disease management areas. See 'Disease Management Area' for further detailed information.**

Disease Management Area

The position of this site would result in the joining of existing disease management areas 5c E North Uist and 7a Ronay, Benbecula, N South Uist (see attached map) as currently defined in Marine Scotland management area maps, available on the Marine Scotland website: <https://www.gov.scot/publications/fish-disease-management-areas>. Joining of disease management areas is against [Scotland's Marine Plan: Aquaculture 6](#) and therefore not supported by MSS. From a fish health perspective, it is important to maintain firebreaks between DMAs to reduce the risk of disease spread. The main purpose of any firebreak is to support a sustainable aquaculture industry by compartmentalising the Scottish industry into manageable areas to allow for the control of serious listed diseases. The joining of DMAs represents an increased risk to the spread of disease. The separation distances used to maintain gaps between DMAs have in the past been demonstrably effective in controlling the spread of listed diseases between sites in separate DMAs.

It should be noted that MSS would object to any future planning application should this application progress with the site at its proposed location, unless there are changes to existing disease management area boundaries which would maintain their separation. Furthermore, MSS would refuse authorisation to an Aquaculture Production Business (APB) to operate a site in this location under The Aquatic Animal Health (Scotland) Regulations 2009, where the operation of the site would result in the joining of disease management areas and be against [Scotland's Marine Plan: Aquaculture 6](#).

The applicant has stated that in order to maintain a break between the two disease management areas they would not operate the Outer Eport site (FS1254), situated to the south of DMA 5c, concurrently with the proposed site at Morrison's Rock. Scotland's Marine Plan (Aquaculture 6) permits Marine Scotland to revise these boundaries to take account of changes in fish farm location; however rather than repeated movement of the boundary between DMA's 5c and 7a, the applicant should decide on a preferred production strategy which would provide stability and avoid alteration

of DMA boundaries between production cycles; as this would not be facilitated during a disease outbreak with movement controls in place.

The applicant refer to previous discussions with MSS in which it was indicated that permissions for the Outer Eport site would be relinquished in favour of the new site if granted; however this degree of inactivation is not suggested in the screening and scoping application. MSS ask the applicant to seriously consider which site they wish to operate at in future, with a more stable plan for the inactivation of Outer Eport put in place and specific information addressing this provided with any further application.

Stocking Density

From the information given in the application, the operation of the sites will be at an acceptable stocking density level of below 22kg/m³.

Husbandry

The scoping report details that mortalities will be removed from pens daily using a lift up system. Details of how mortalities will be disposed of should be submitted. The 160m pen has only recently come into use in the Scottish aquaculture industry, and difficulties may be encountered conducting husbandry operations in such large pens. Further information on operating with 160m pens should be provided as detailed in 'Containment'.

Sea Lice

The proposed site is situated out with current farm management area (FMA) boundaries. The nearest FMA is W-15 and all 4 sites in this FMA are operated by the applicant and are currently active. These sites provide a useful indication of sea lice history and sea lice management in the area. During the most recent production cycle in 2021 numbers of adult female *Lepeophtherius salmonis* were above the MS increased monitoring level of 2 at all 4 sites intermittently during the last year of production for which records are available following when mandatory reporting commenced in March 2021. Treatments were applied including physical treatments, freshwater baths and medicinal treatments and stock responded to these treatments; however numbers soon increased again and further treatments were required which did however continue to be effective at reducing sea lice numbers and maintaining them below the MS intervention limit of 6 adult females.

The Environmental Management Plan provided gives an overview of the sea lice management strategies available to the site to ensure satisfactory measures for the prevention, control and reduction of parasites are in place; further details are also included in the Scoping report; additional specific details are requested as outlined below.

Sea lice monitoring is undertaken with counts conducted from 10 fish from every stocked pen. Criteria for implementing intervention following sea lice counts is more stringent than the proposal in the CoGP (0.5 adult female Feb-June and 1 adult female July-Jan) at a threshold of 0.5 adult females applied all year or 0.25 adult females where water temperature is over 10°C. This is based on current knowledge of lice moult rates and allows ample time for treatment planning and resource allocation. A suitable intervention will be chosen from the available management measures (table 4, EMP) in accordance with the integrated sea lice management plan (figure 4, EMP); the applicant states that biological control and physical treatments are favoured with an aim to reduce medicinal treatments. Ultimately, the site would be depopulated if all prior interventions had proven unsuccessful.

The applicant state that they intend to operate the proposed site in synchrony with the neighbouring sites in the FMA in terms of fallowing, stocking and harvesting and also 'coordination' of sea lice treatments. The Environmental Management Plan (EMP) provided lists Maragay Mor and Maaey as the other sites in FMA W-15. However, there is no reference to Greanamul (FS1282), clarification should be provided on the ongoing use of Greanamul. It should also be noted that whilst the applicant list Uiskevagh (North and South) as inactive in the scoping report; The Scottish Salmon Company are still authorised by Scottish Ministers to operate at the Uiskevagh site (FS1255). Confirmation on its use going forward should be provided.

The scoping report states that a combination of lumpsuckers and wrasse are proposed to be stocked on site. Cleanerfish are stocked early in the cycle, soon after completion of smolt intake with 'top-ups' completed as required. Health screening occurs prior to transfer and staff are trained in health and welfare to care for cleanerfish on site. Details of the sources of cleanerfish should be provided to assess if an adequate supply of cleaner fish for the purpose of effective biological control can be obtained.

Freshwater treatments are listed as a strategic and reactive treatment. Details of freshwater sources and application on site should be provided. Furthermore, as this site proposes to stock cleaner fish; extended freshwater treatments may not be suitable or may create additional logistic challenges in administering treatments. Research suggests that lumpfish appear tolerant of freshwater exposure in bath treatments for 3-5 hours, however longer treatment times or use of wrasse may require the cleaner fish to be removed prior to the treatment being conducted. Further information is sought on considerations to cleaner fish health and welfare and details of proposed procedures for removing cleaner fish prior to freshwater treatment should be provided.

Other physical removal methods such as hydrolicing and thermolicing are also available to site. The applicant state that they have recently increased their capacity of hydrolicers, therefore improving their response time to infestation pressures. Further information on time taken to treat the sites with these methods should be provided.

The modelling report states quantities of chemotherapeutants expected to be permitted for use on site. In terms of expected permitted quantities the site could be treated with Deltamethrin in 2 days or 6 days with Azamethiphos. An efficacy statement should be provided detailing how the permitted quantities are proposed for use on site, the method of their application and a timeframe for the practical application of bath treatments of chemotherapeutants.

Difficulties may be encountered conducting sea lice treatments in such large pens. Further information on use of 160m pens should be provided as detailed in 'Containment'.

Containment

The proposed contingency plan for dealing with an escape or suspected escape event is satisfactory.

The information provided on equipment and strategies in place to minimise predator interactions at the site in question is satisfactory as far as can reasonably be foreseen, tensioned top netting will inhibit entry from aerial predators and strong rigid HDPE pen nets highly tensioned with sinker tubes and possibly seal blinds at base will be used to prevent predation from seals. A wildlife log will be kept of sightings to increase knowledge of local and seasonal trends at the new site along with details of any entanglements or interactions with pens. Regular mortality removal will also be practiced. Any use of ADD's will be in line with the requirements of Marine Scotland Licensing Operations Team.

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. 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 should be noted, that whilst the implementation process for 'A Technical Standard for Scottish Finfish Aquaculture' (STS) is still being delivered; due to the costs and timeframes involved in aquaculture site development, the industry should be working towards meeting the guidance provided within the STS to ensure compliance when implementation occurs, further guidance on STS can be viewed online <https://www.gov.scot/publications/technical-standard-scottish-finish-aquaculture/>.

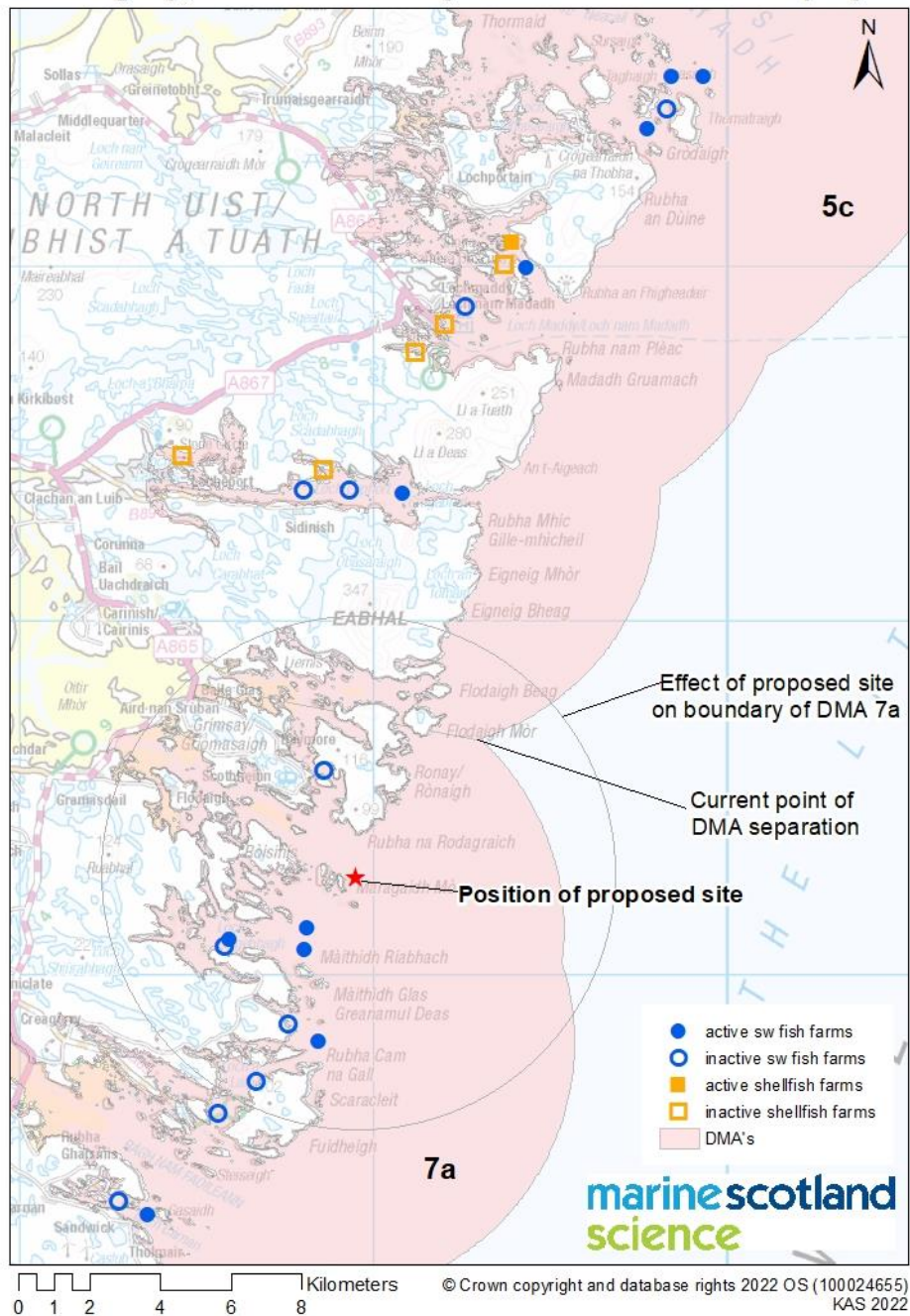
The 160m pens proposed are the largest currently in use in the Scottish aquaculture industry and are currently only used on one site by another operator. Further to evidence of equipment suitability for the environment; information should also be provided to support the use of such large pens considering the potential impacts on procedures and detailing the infrastructure in place and availability of suitable equipment - boats, winches, tarpaulins and staff to allow husbandry operations and any treatments or sea lice interventions required to take place efficaciously without any increased risk to the success of these procedures or to the containment of fish on site. Details of knowledge and experience of staff in working with pens of this size or proposed training should also be provided.

For information: Operations and records on site must meet the requirements of The Aquatic Animal Health (Scotland) Regulations 2009, The Aquaculture and Fisheries (Scotland) Act 2007, The Fish Farming Businesses (Record Keeping) (Scotland) Order 2008, The Fish Farming Business (Reporting) (Scotland) Order 2020 and The Aquaculture and Fisheries (Scotland) Act 2013. Compliance with this will be inspected during routine visits by the Fish Health Inspectorate.

Summary

It should be noted that should this application progress, MSS would object to any future planning applications that may be submitted for this site in its proposed location, should this result in a joining of disease management areas. Furthermore, MSS would refuse authorisation to an Aquaculture Production Business (APB) to operate a site in this location under The Aquatic Animal Health (Scotland) Regulations 2009, should this result in a joining of disease management areas.

Potential impact on Disease Management Areas and aquaculture sites in the vicinity of proposed new site at Morrison's Rock, Uiskevagh, Creagorry, Isle of Benbecula by The Scottish Salmon Company



Western Isles District Salmon Fisheries Board

(Date Consulted - 17 Jun 2022)

RESPONSE

The WIDSFB would like to express their concern that the EIA report as proposed, is not sufficient to

assess likely significant effects on the environment and in particular wild salmonids.

WIDSFB would like to highlight the following points as they have not been included in the scope of the report.

- o Movement of wild salmonids in the North Ford area is not well understood although they are known to be present because they feature in the rod catch of fisheries that are close by.

It is not possible to properly assess any impacts that might occur to wild salmonids if their movement in relation to the proposed site and through the wider environment is not understood. There would be scope to gather such data by installing additional acoustic receivers as part of the west coast tracking project.

o WIDSFB are not aware of any monitoring work in the North Ford area that would have established baseline information for wild salmonids including population sizes and background levels of sea lice. One potential method of gathering baseline data would be sweep netting in the North Ford area. Although monitoring of wild salmonids would form part of the EMP it is vital monitoring be implemented prior to the proposed site going into production.

o The proposal creates significant potential for cumulative impact especially when considering the performance of other Scottish Salmon Companies sites close to the proposed development. During the last production cycle Maragay Mor and Maaey saw lice levels reach 3.60 and 3.67 (May 2021). Therefore, detailed information should be provided in the form of Sea Lice Dispersal modelling. Outputs from Sea lice dispersal modelling should include.

1. Analysis for a full production cycle.
2. Analysis alongside existing sites SSC - Maragay Mor and Maaey.

Furthermore WIDSFB would appreciate information as to how the potential for significant cumulative effects will be managed in what appears to be a challenging area for effective sea lice management.

CONSULTEE

SEPA

(Date Consulted - 17 Jun 2022)

RESPONSE

Screening opinion

The proposed development will be likely to have a significant effect (in the context of the Regulations) on the environment by virtue of its nature, size or location and therefore an EIA is required.

Benthic habitats

- o visual surveys to be carried out
- o benthic surveys to be carried out
- o residue sampling to be carried out.

HG and NewDepomod reports have been assessed and approved by SEPA Modelling.

Water column

ECE report has been provided

Shellfish interests

There are no Shellfish Water Protected Areas (SWPA) or Shellfish Harvesting Areas (SHA) within a 3km search radius of the site.

Natural heritage interests

Proposed site lies within:

- o 2 km of the Inner Hebrides and the Minches SAC, the qualifying interests of which are Harbour porpoise.
- o 3 km of the Sea of the Hebrides Nature Conservation MPA, the protected features of which are Basking shark, Minke whale, Fronts and Marine Geomorphology of the Scottish Shelf Seabed.

Mobile features not considered to be at significant risk from discharges from fish farm

There are records of the following Priority Marine Features (PMFs) within 3km of the fish farm:

- Ocean quahog (*Arctica islandica*).
- Northern sea fan and sponge communities
- Kelp beds
- Kelp & seaweed communities on sublittoral sediment

MS locational guidelines

Uncategorised

WFD classification

- Flodaigh Beag to Rubha Roiseal (ID 200479) High status

Other users

- Maragay Mor, Maaey and Greanamul finfish farms are within 5km of proposed site.
- Small scale scallop, Nephrops and crab and lobster fisheries in vicinity.

SEPA are in general agreement with what the applicant proposes to screen in (and out) of their EIA.

The following has been assessed and approved by SEPA Modelling:

NewDepomod modelling, which has determined a maximum biomass of 3080T and the quantities of infeed sealice medicine which will allow compliance with the CAR permit

BathAuto modelling has determined the quantities of bath sealice medicines which will allow compliance with the CAR permit

The following has been submitted but will be evaluated as part of the ES with the Planning application:

An ECE calculation to determine potential for nutrient enrichment

The following information is still required in support of this application:

Seabed surveys (visual and benthic) to assess the suitability of the location, which the applicant states are yet to be undertaken.

We strongly recommend that any survey work is carried out as per SEPA guidance on our website dated May 2022.

Advice should be sought from NatureScot as to the status of the PMFs in the vicinity.

OFFICIAL

○ 3 km of the Sea of the Hebrides Nature Conservation MPA, the protected features of which are Basking shark, Minke whale, Fronts and Marine Geomorphology of the Scottish Shelf Seabed.

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The following information is still required in support of this application:

- o Seabed surveys (visual and benthic) to assess the suitability of the location, which the applicant states are yet to be undertaken.

We strongly recommend that any survey work is carried out as per SEPA guidance on our website dated May 2022.

Advice should be sought from NatureScot as to the status of the PMFs in the vicinity.

Regulatory advice for the applicant

Details of regulatory requirements and good practice advice, for example in relation to private drainage, can be found on the regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team at: AHSH@sepa.org.uk

CONSULTEE

NatureScot

(Date Consulted - 17 Jun 2022 and 16 August 2022)

RESPONSE

No response – reminders sent, 15 August and 5 October 2022

CONSULTEE

Historic Environment Scotland

(Date Consulted - 17 Jun 2022)

RESPONSE

Thank you for your consultation which we received on 17 June 2022 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and

their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

Your archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

Proposed Development

We understand that the proposed fish farm lies to the east of the Isle of Benbecula and comprises x6 160m circumference pens, held in a 2 x 3 grid matrix. The fish farm covers a total surface area of 1.22 ha and has a biomass capacity of 400 - 650 tonnes.

Scope of assessment

We can confirm that there are no heritage assets within our remit, as listed above, within the proposed development area or its vicinity. We are therefore content for impacts on cultural heritage assets within our remit to be scoped out of the assessment.

Further information

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes. Technical advice is available on our Technical Conservation website at <https://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Samuel Fox and they can be contacted by phone on 0131 668 6890 or by email on samuel.fox@hes.scot.

CONSULTEE

Royal Yachting Association (Scotland)

(Date Consulted - 17 Jun 2022)

RESPONSE

I write to inform you that RYA Scotland has no comment that they wish to make at this stage on this application.

CONSULTEE

Assistant Harbour Master

(Date Consulted - 17 Jun 2022)

RESPONSE

The proposed Morrison Rock fish farm has been reviewed in terms of safety of navigation by the Northern Lighthouse Board in consultation with CNES Harbours with lighting and marking requirements set out in the Northern Lighthouse Response. While we would agree with all the requirements set out we would highlight the 2 requirements below which we consider to be vital in ensuring safety of navigation in a confined area.

o Outlying anchor points should not be marked with buoys and alternative means to locate anchors should be utilised.

o Loose floating lines around site equipment are not acceptable as these can cause serious safety implications for mariners.

We would also highlight that if the site operator seeks to increase the number of vessels using Kallin harbour they should be mindful that there is very little scope for increased activity and that any plans must be discussed and agreed with the Harbour Authority.

CONSULTEE

Biodiversity Officer

(Date Consulted - 17 Jun 2022)

RESPONSE

I have no comments on the significance of effects and scope of the EIA.

CONSULTEE

Western Isles Fisherman's Association

(Date Consulted - 17 Jun 2022)

RESPONSE

All the responses that I have received have been vehemently opposed to the development as being in the wrong location and impacting hugely on the future livelihoods of local vessels that have been fishing within the site for generations and had earlier discussions taken place with fishermen before the site was ever considered a more suitable site with less impact on fisheries and navigation could have been mutually agreed with Scottish -Salmon. However, it seems that large companies continue to ignore where traditional fishermen have been fishing for generations and expect them to be displaced to other areas with small inshore vessels with no consideration given to the economic impact that their continuous pollution of the marine environment is having on localised shellfish stocks.

Please find attached sample of photos taken by skippers of debris they have been recovering around their gear, further illustrating the importance of having clear navigational passage through the channels as fouling with such ropes in hours of darkness could result in vessels being on the shore before any action could be taken.

This is the third site within a mile of the busiest fishing harbour in the Western Isles and should not be developed for the benefit of further commercial salmon production at the expense of local fishermen who have provided sustainably landings to a host of various live shellfish to vivier buyers that export to EU markets on a weekly basis for the last 40 years and to Kallin Shellfish the local shellfish processing company that has been providing up to 30 people in all year employment for the last 20 years.

Loch Uisgebhagh to the South of this site is already completely blocked off by 2 huge salmon sites as is the entrance to the North end of the Wiay Sound by another large site.

The feedback received from fishermen who have operated scallop dredging within the proposed site for the last 40 years has been that this application should be rejected, due to its significant negative impact on a locally managed sustainable fishery which provides additional onshore local processing employment. The proposed site is within an already successfully regulated seasonal scallop fishery which has been managed sustainably since 1984 through the Inshore (Scotland) Act and during the seasonal fisheries yields at least 100 bags 3,000 kg of scallops to each of 3 local under 15 metre scallopers who supply their catch for processing to Kallin Shellfish for over 20 years. The commercial fishermen who have and are providing sustainable employment in remote island locations during challenging times have seen too much of their traditional scallop grounds surrendered to salmon farming over the last 50 years, as they move from shallower grounds to more offshore grounds to find that scallops and shellfish never return to areas that have been previously used for salmon farming.

All those scallop vessels are fitted with Vessel Monitoring Systems, cameras and winch sensors providing an accurate plotter track to indicate their fishing activity through the proposed site and loss of access to those grounds will have a devastating impact on both the scallop vessels and the processing factory at Kallin Shellfish that is dependent on landings from the areas to provide raw material for staff to process when vessels have no access to alternative grounds in winter months. Those vessels have data going back 10 years to illustrate that they have been permanently dependent on having access to those grounds which have been fished sustainably rather than hand those productive grounds over to salmon farming where all marine life in close proximity to the site will be killed off with all the chemicals being used to treat the fish and those grounds will never again become fertile shellfish grounds, as has been the case with shallower waters in the seal lochs to the East of Uist.

Static gear vessels have highlighted that they have set half their wrasse gear along the shore and within the rectangle during the wrasse fishing season from May until end of October, in addition excellent velvet crab and lobster grounds would be lost with smaller vessels losing around 20% of their income with no alternative grounds available for fishing those species.

Continuous mortalities are a common occurrence within the Western Isles salmon farming industry resulting in numerous bins being left at Harbours throughout the Western Isles creating an unwelcome smelly shore environment for tourists and other visitors. The requirement for multiple treatments for numerous diseases is creating an inshore marine environment which is killing off resident shellfish stocks which would grow and be of additional economic benefit to local fishermen once they reached marketable size. A shuttle service has been developed from sites transferring dead fish for burial ashore in North Uist.

Instead of creating further pollution within inshore waters companies should be reducing stocking densities, rather than camouflage that installing larger pens will improve husbandry and reduce treatments on sites, this is certainly not the case.

It's clear that developing this site will have a disproportionate negative impact on local scallop, velvet crab, lobster and wrasse fisheries coupled with the additional dangers posed in a navigational channel that is well used by many vessels arriving and departing from Kallin Harbour. There is an urgent requirement to identify productive commercial shellfish grounds and navigational channels used regularly by inshore vessels so that those can be avoided for future salmon farming development and this site clearly falls within that category and Scottish Salmon should not be approved to develop this site.

Notification had already been sent to Scottish Salmon that early discussions should begin with the locally based fishing industry operating to the East of Uist, so that sites which would have much less negative impact of commercial fisheries could be identified for future development of commercial salmon farming. In addition, the piloting of onshore salmon harvesting should be explored as is being developed in other areas of Scotland, so that all much tighter controls could be monitored to ensure that discharges into the sea from onshore tanks would create an industry that would be much better for the marine environment.

At time of writing Scottish Salmon has just indicated that they are in agreement to have face to face meetings with industry regarding future developments and those will commence at a meeting of the Outer Hebrides Regional Inshore Fisheries Group when representatives from around Scotland will be attending a virtual meeting when the screening and scoping for the proposed site North of Gravir will be on the agenda, so an industry response will be sent to the Comhairle following that virtual meeting on Friday 8 July.

In conclusion, it's important that a wide ranging scoping is undertaken to ascertain the overall impacts that the development of fish farming has had on sea lochs in the Western Isles, with vast

amounts of fish farming debris being reported along shore line throughout the Western Isles. Herring that used to be prevalent in inshore lochs have disappeared from all sea lochs where salmon farming has been developed indicating a clear linkage with treatments used for sea lice.

CONSULTEE

Northern Lighthouse Board

(Date Consulted - 17 Jun 2022)

RESPONSE

Thank you for your e-mail correspondence dated 17th June 2022 relating to the Screening and Scoping Request submitted by Scottish Salmon Company (SSC) relating to their plans for a new site development south of Morrison's Rock, Isle of Benbecula.

Northern Lighthouse Board recommend the following marking and lighting requirements:

- o The cages should be marked with 2 lit yellow special mark poles fitted with yellow 'X' topmarks.
 - o Each light should display a character of flashing group four yellow every twelve seconds (Fl (4) Y 12s) with a nominal range of 2 nautical miles and be installed above the 'X' topmark.
 - o The poles should be positioned at the most Northern and Eastern seaward corners of the cage group, preferably mounted to the corner cushion buoys to ensure maximum visibility clear of the cages, guard rails and netting.
 - o The lights should be installed to be clearly seen by vessels approaching from all navigable directions.
 - o The poles should be 475mm diameter, the 'X' topmark should be 475cm length by 15cm width.
 - o In addition, this site requires a Red navigation light to be mounted on a red perch with a can topmark and radar reflector on the drying rock at Bo Mor, WNW of Morrison's Rock. This would be required to be installed and maintained by the site operator. primarily for the benefit of the vessels servicing the farm site. The light would require to be mounted a minimum of 2 metres above Mean High water Springs. This light should display a character of flashing red once every four seconds (Fl R 4s), with a nominal range of 3 nautical miles.
 - o The feed barge should exhibit an all-round fixed white light with a nominal range of 2 nautical miles from a point at least 1 metre above any other obstruction and be powered independently of the other feed barge electrical systems to ensure operation during period when the local power supply is turned off.
 - o A weekly check of the site's marking equipment shall be performed and records kept of its physical and working status for audit purposes.
 - o Outlying anchor points should not be marked with buoys and alternative means to locate anchors should be utilised.
 - o Loose floating lines around site equipment are not acceptable as these can cause serious safety implications for mariners.
 - o The site plan and all hydrographic survey data collected should be shared with the UK Hydrographic Office (sdr@ukho.gov.uk).
-