

John F. Robins, Secretary and Campaigns Consultant, Animal Concern,
Post Office Box 5178, Dumbarton G82 5YJ. Tel. 01389-841-639, Mobile: 07721-605521.
E-MAIL: animals@jfrobins.force9.co.uk website: <http://www.animalconcern.org/>
Animal Concern is a pressure group registered as a non-profit making Limited Company
(Co. No. SC109126) established in 1988 as Animal Concern (Scotland) Ltd.
It incorporates the Scottish Anti-Vivisection Society which was founded in 1876.

ePlanning Centre,
The Highland Council,
Glenurquhart Road,
Inverness IV3 5NX

OBJECTION TO PLANNING APPLICATION 19/03093/FUL from Organic Sea Harvest for a new 12 x 120m circumference circular cage marine fish farm for Atlantic Salmon to be sited north east Of Bridgend Cottage, Flodigarry, Portree, Isle of Skye.

I am objecting to this planning application on behalf of Animal Concern. I have monitored fish farming in Scotland since the days when the Corran Halls in Oban comfortably accommodated the joint annual meeting of the Scottish fin fish and shellfish industries.

In 1988 I was responsible for the only successful prosecution under the Conservation of Seals Act 1970 of a seal-shooting salmon farmer. This was achieved on a technicality: the Skye farmer used his shotgun instead of a rifle.

In the absence of official figures for numbers of seals shot under the Conservation of Seals Act my guesstimate of an average of ten seals killed per annum per salmon farm site was widely accepted and went unchallenged for well over a decade. Indeed I was told by fish farm workers that my guesstimate was very conservative.

I helped have the sentience of fish recognised in the Animal Health and Welfare (Scotland) Act 2006 and, due to a meeting between myself and one of the people drafting the Act, the giving of goldfish and other living animals as prizes was made illegal under the new law. Indeed when Ross Finnie launched the Act he focused on it being the law that stopped fairgrounds giving goldfish as prizes.

I do not live in the immediate vicinity of the proposed Flodigarry Farm, but I could be considered a NIMBY in so much as the whole of Scotland is our backyard and we have a duty to protect our environment and the animals which inhabit it. Perhaps unlike others who do live, work or enjoy leisure time close to salmon farms I would like to see the use of top nets in dayglo colours to warn off wildlife and aid navigation around the myriad of farms crammed into our coastal waters.

One of my concerns over the proposed Flodigarry site are plans to use double netting with an acoustic seal deterrent device array which will trigger automatically. Documents from the applicant state: "It is intended that the ADDS will be triggered by the reaction of fish to seal attack detected automatically within the cages." This means that before the ADDS start to sound the Animal Health & Welfare (Scotland) Act will already have been broken. Under that Act all livestock farmers have a legal duty to protect their animals from not just physical attack by predators but from the fear and stress caused by the close presence of predators. The only way to achieve this is by the installation and proper maintenance of high strength, high tension predator exclusion nets which keep predators at a distance from the cages holding the salmon.

The applicant also suggests ADDS will only be used when there are seals in the area and that they will be turned off at night. I was told something similar by an executive of another salmon farming company who claimed acoustic deterrents were only used when seals were in the vicinity of the farm. When we arrived at the farm the ADDS were on, so I asked the site manager where the seals were. He told me – "You'll not see any seals here – we run those scarers 24/7 and they work bloody well." That is a major concern. Any salmon farm without external predator exclusion nets would, to meet the requirements of the Animal Health & Welfare (Scotland) Act 2006, need to consider running their ADDS 24/7 to keep marine mammal predators from disturbing and distressing the salmon. This means seals and other animals are excluded from large areas of their natural habitat and from routes they use to move around our coast. In other areas salmon farms have caused seals to abandon traditional haul-out sites and scared porpoise, dolphins and whales away from the area. This causes problems for wildlife tour boats and has negative effects on the local economy.

I understand there is at least one resident seal colony in the area. Be in no doubt – that seal colony will be moved or removed if a salmon farm, organic or otherwise, RSPCA Assured or not, is allowed in the area.

It is also a concern that even "organic" salmon farms are permitted to make some use of chemicals and pharmaceuticals to combat sealice infestations and infectious diseases. These agents can kill the eggs and larvae of shellfish as they drift in the currents and have the potential to adversely affect mussel farms and wild stocks of crab, lobster and other shellfish.

It is of much concern that the applicant wishes to establish their farm on what appears to be a major junction in the migratory routes of salmon and seatrout from a number of river systems. It is well known that salmon farms and wild salmonids do not good bedfellows make. Evidence has recently been uncovered to show sealice infestations on salmon farms can reach levels where one organic solution, adult lumpfish and wrasse cleaner fish, can themselves be killed by sealice. What chance then for young salmon and smolts migrating passed and under salmon farm cages?

Sea trout and Atlantic Salmon are in great decline and Scotland has a duty to protect what stocks are left. One way of doing that is not to plonk salmon farms on their migration routes.

The use of cleaner fish is also of concern in that catching wild fish and transporting them to salmon farms can cause local depletion of these fish thus causing an unnatural imbalance in the ecosystem they are removed from.

Although it might not be of direct concern in planning terms I think it is important to remember that salmon farming is not a sustainable industry. Even without taking account of the mass mortalities suffered by the industry in recent years you have to catch and kill perhaps three to five tonnes of wild fish to make the food pellets needed to produce one tonne of saleable salmon product. This has major adverse effects in that it uses fish which might otherwise be fed direct to people in areas where stocks of fish traditionally caught by subsistence local fisheries are being fished-out by industrial trawlers contracted to fish feed manufacturers.

This industrial overfishing also cuts the marine food chain adversely affecting everything from Krill to Blue Whales.

Another aspect of salmon farming which will not be relevant to any planning application is that it is a very cruel industry with more animals dying from disease, parasite infestation and mishandling (e.g. in mechanical/thermal sealice treatments) than in any other livestock industry on the planet.

However once those fish succumb and become morts they do become relevant to the planning process. Morts, in some instances hundreds of thousands of them at a time, have to be disposed of. They must be safely stored and then transported for safe disposal. Sometimes convoys of morts have to be transported many hundreds of miles by road to facilities licensed to handle toxic waste. Has the applicant made sufficient provision to deal with worse-case scenario high mortality events requiring safe storage and disposal of large numbers of toxic morts?

It is a great pity that Organic Sea Harvest did not go down the route of establishing an onshore enclosed organic salmon farm which would have improved the welfare of the fish, eliminated any sealice problems and turned the large quantity of fish faeces created into saleable organic fertiliser instead of a marine pollutant.

Animal Concern asks Highland Council to refuse planning application 19/03093/FUL.

Yours faithfully,

John F. Robins,
For Animal Concern