PE2109/L: Halt any further pump storage hydro schemes on Scottish lochs holding wild Atlantic salmon

Petitioner written submission, 28 January 2026

Dear Citizens Participation and Public Petitions Committee,

Ness District Salmon Fishery Board (Ness DSFB) wishes to submit the following as a further contribution to our Petition – PE2109.

Ness DSFB note that, at the Committee meeting on 10 September 2025, Davy Russell MSP queried why further work was required to understand the impact of a long establish technology such as pump storage hydro (PSH). Our petition is prompted by the fact that the impacts of PSH on wild Atlantic salmon are not understood. PSH may be a mature technology but the virtual absence of new developments in recent decades means that relevant research into their impacts has not occurred in the UK, nor elsewhere as far as we can ascertain. We note that, in countries such as USA and Canada, new PSH schemes are only permitted on "closed-loop" sites, where water is pumped between man-made, upper and lower reservoirs. This is because of the environmental impact on migratory fish and other concerns in open-loop, natural systems. The existing Welsh PSH schemes are closed-loop, both utilising old slate mines, as is the proposed Glenmuckloch PSH scheme in Dumfries and Galloway.

SSE, in their written submission to the Committee, acknowledged that they have not commissioned any new research into the impact of pumped storage hydro operations on wild Atlantic salmon. The only evidence they cited was that salmon smolts were not impinged on the smolt intake screens at the Foyers PSH. Conventional hydro has had a significantly detrimental impact on Scotland's wild salmon populations. Indeed, SSE refer to the extensive monitoring, mitigation and restoration work they are currently involved in delivering to address issues, both legacy and operational, associated with impacts of conventional hydro. Many of these issues were not considered, nor understood, at the time of construction in the 1950s and 1960s.

The developers of the proposed Glen Earrach PSH on Loch Ness did commission a salmon smolt tracking study in 2025, involving 200 tagged wild Ness smolts. That study was completed and Glen Earrach Energy have stated that they do not intend to report on the study "*ahead of the commencement of construction, post determination*. *These data will be used to inform specific mitigation and operation measures that would feed into a fish management strategy that would form a planning condition".* Ness DSFB do not consider it acceptable that the findings of this study will not be made available to help ascertain the impact of this, or indeed other, PSH schemes on Ness salmon smolts, pre-determination. We regard the impact on salmon smolt migration as potentially one of the most significant impacts of PSH and consider that studies such as this should have been undertaken as part of the EIA and submitted with the planning application to facilitate an informed decision.

Gillian Martin MSP, Cabinet Secretary for Climate Action and Energy, in her appearance at the January 2026 Committee meeting, referred to a SEPA PSH

Working Group, and its work. Ness DSFB is pleased to hear that SEPA have established this group, but there has been no communication, nor any insight into the SEPA guidance referred to. Considering the number of live PSH planning applications and the impending Loch Kemp PSH Public Local Inquiry (scheduled for mid-April, 2026) we consider it imperative that SEPA's position regarding PSH is consulted on in advance. Ness DSFB ask that the SEPA working group consider whether the existing template for licencing such developments (Controlled Activities Regulations (CAR) licence) is adequate and appropriate, for the complex interactions of PSH with the water environment, and particularly the cumulative impact. CAR licences for conventional hydro schemes are basic, the key criteria regulated being water abstraction and return points as well as volumes. In comparison to conventional hydro, the impacts of PSH are profound with alterations to the natural hydrology and temperature regime of lower headponds possible.

Given its biodiversity and economic, social, and cultural significance, Loch Ness is one of the most sensitive locations possible. Scotland needs to be sure that the impacts of PSH in such a significant location are understood. NPF4 requires that these large schemes not only protect biodiversity but enhance it. Protection of existing biodiversity should be the priority rather than subsequent mitigation in an attempt to deal with lost biodiversity.