

Environment, Climate Change and Land Reform Committee**Environmental impacts of salmon farming****Supplementary written submission from Argyll and Bute to supplementary questions following ECCLR meeting of 6 February 2018**

I am responding to your request for clarification as to how Environmental Management Plans address cumulative issues. First point is that any applications requiring Environmental Impact Assessment are required by the EIA Regulations to address cumulative impacts in association with other developments, so an applicant would be expected to address wild fish interactions on a cumulative basis. In other cases there is no express requirement for the applicant to provide cumulative information, although we would expect Marine Scotland in their consultation response to provide advice on likely cumulative effects upon wild fish interests. By the time we get to the point where an Environmental Management Plan has been required by condition, the extent to which that is able to address cumulative issues is likely to be influenced by whether farms in the same water body are in the control of the applicant, or whether there are multiple operators. It is clearly appropriate to ask an operator of a suite of farms to address their response to a condition in the light of those farms which they operate which could reasonably be expected to present cumulative issues, but it is less practical to ask them to address issues arising from farms in the control of others, where their access to information will not be the same.

As a general point about EMP's, whilst they provide some reassurance that wild fish interests are being addressed in the context of a particular application, they are not an appropriate means to provide an area wide response to the overall impact of sea lice. As it is there are many pre-existing sites operating without EMP's, and without any prospect of such unless an application should be made to alter a farm in the future. EMP's are resorted to by Planning Authorities given the lack of an overall area based approach to wild fish interests founded around cumulative impacts. They are only capable of providing a somewhat random and ad hoc response to an issue which is ongoing, regardless of the incidence of planning applications. Accordingly, we have situations where a loch with no applications holding many thousands of tonnes of biomass may not be subject to any ongoing consideration of wild fish interactions, whereas another loch with an application for an extension of a few hundred tonnes may prompt the requirement for an EMP and the potential need to address cumulation with other sites. They are in effect a sticking plaster, not a systematic means of assuring well-being in the wider environment.

Please note that the Planning Authorities responsible for aquaculture are agreed that EMP conditions afford the only means open to them to monitor the effectiveness of an operator's response to the incidence of sea lice arising from the operation of a particular site, and present the only opportunity to require monitoring data or to introduce sanctions in the event that lice numbers after mitigation become significantly more prevalent than envisaged at the application stage. That does not, however, mean that EMP's are the best means of monitoring the impact of sea lice from multiple sources upon a given water body. That would be best addressed routinely on an area wide basis (by Marine Scotland with input from SNH and the DSFB's?) taking into account all existing development, and operating experience

gained from that development, without having to wait for a random catalyst presented by a planning application. The haphazard response to date via a small number of EMP's would suggest that responsibility for wild fish interactions has been inappropriately allocated to Planning Authorities, who given their reactive role, are not in my opinion the best placed regulator to address this issue on a comprehensive basis, taking into account cumulative effects.

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