

**Argyll and Bute Council
Development and Economic Growth**

Delegated or Committee Planning Application Report and Report of Handling as required by Schedule 2 of the Town and Country Planning (Development Management Procedure)

The points of objection include a link to an article on Salmon Farming in the Economist magazine. The full article is not available without subscribing, however, the objector has summarised as follows:

There it clearly says that global warming is the cause of higher mortality in fish farms in Scotland. It is clear that the salmon farm industry is doomed, facing extremely challenging and worsening climate conditions that will considerably weaken the industry, probably terminally.

There is therefore no point approving the plan from Bakkafrost. We have now at least 4 reasons to reject the farm on Gigha:

1. The inhabitants on Gigha do not want it in their vast majority.
2. Poor conditions raise serious questions about animal welfare.
3. The industry is a serial polluter, using various environment-damaging chemicals such as anti-lice medication or antibiotics, and using animal feed that leads to environmental imbalances.

Please provide their replies, including their responses to the point that the warming water in south and west Scotland is exacerbating the causes of poor fish welfare and high mortality.

As you know, this effect was clearly demonstrated by the peer-reviewed research paper by Scottish Government scientists (Moriarty et al) referred to in the Friends of the Sound of Jura's submission. This will only get worse as the climate warms further.

Thank you for consulting MDSG about the impact of climate change, however, it is not adequate for MDSG to dismiss this factor from fish farm consenting by saying that its analysis was not regionally specific.

The Government's own published regional salmon farm mortality figures (Fish Farm Production Survey 2023) show that mortality is much higher in warmer water areas (Argyll and the Western Isles) than in the colder waters further north.

It is also not adequate for MDSG to say only that fish farms are expected to manage farmed salmon mortality to the lowest possible level.

Mortality in both of Bakka Frost's existing farms at Gigha has been above 80% three times.

That is clearly as low as the company could manage at this location but it is just as clear that this is not acceptable.

The Planning Committee must be fully apprised of this risk when considering whether to consent a new farm in one of Scotland's most southerly fish farming locations, where the water is warmest and the mortality at the two existing farms is the highest in Scotland.

If the likelihood that a company will or will not be able to humanely farm fish is not a material consideration for planning decisions, please could you explain why this is the case?

Comment: The Fish Health Inspectorate is responsible on behalf of Scottish Ministers for ensuring action to prevent the introduction and spread of listed and emerging fish diseases in Scotland.

Consideration of the practices proposed on site will be made to ensure the proposal does not lead to an unacceptable risk of disease spread.

The Fish Health Inspectorate operates a general presumption against farming at new sites that would bridge existing disease management areas, based on the potential for this to lead to the unacceptable risk of disease spread. Considerations of other practices that may impact risk of disease spread will also be made e.g. stocking and fallowing strategies, farm management agreements in place with other operators sharing areas, stocking density, species to be stocked and mortality removal and disposal procedures.

Where relevant, the location and maintaining access to the site both physically or remotely will also be considered where it is believed this could impact fish health.

Aquaculture Production Businesses must be authorised by the Fish Health Inspectorate, A0W56, n Business

The legislation does not require consultation with the APHA and the welfare of farmed fish is covered by separate legislation and is not a material planning consideration.

4.0 RECOMMENDATION