

From: Friends of the Sound of Jura <info@friendsofthesoundofjura.org.uk>
Subject: Re: Removing the maximum biomass cap on marine fish farms, and siting these large farms in more exposed locations
Date: 15 September 2018 at 12:49:15 BST
To: "Ahearn, Terry"
Cc: Anne Anderson SEPA, Michael Russell MSP, Angus Gilmour Argyll & Bute Council, Gail Ross MSP, Edward Mountain MSP, Cabinet Secretary for the Environment, Climate Change and Land Reform.

Thank you for replying directly Mr A'Hearn.

We would very much like to talk to you about this and would welcome a visit and/or a phone conversation. We will be meeting Roseanna Cunningham on the 25th September to discuss this too. Perhaps we could talk about this first and meet you afterwards?

Can we take it from your reply that none of the applications currently with SEPA for farms above the present 2500 tonne biomass limit will be considered or consented until after the next round of public consultation on the DZR approach to regulation?

Can we also take it that SEPA will make this clear to the Local Authorities which have started to issue planning applications for farms above 2500 tonnes, eg at BDNC Loch Shuna in Argyll?

Why are the fish farms we listed in our email below applying to the Argyll and Bute Council to delete their biomass limits?

As there has been no change to how SEPA regulates FinFish Aquaculture we would welcome some clarity on whether autodepomod is still being used to assess the dispersion of pollution from farms in the high energy sites, with sloping seabeds, where SEPA acknowledges it to be unsuitable. Autodepomod modelling is still being submitted to Argyll and Bute Council for farm proposals in such sites, eg at Corpach Bay on Jura.

If autodepomod is still being used it really would be best for SEPA and the LAs to suspend judgement on these proposals until the new system is in place. To do otherwise risks giving permanent consent to some fish farms that would have been found to do harm under the new regulations and modelling. Concern about the impending change may explain why so many applications are being submitted at present.

Best wishes

Friends of the Sound of Jura