

# ARGYLL DISTRICT SALMON FISHERY BOARD

Argyll & Bute Council  
Lochgilphead

Cherry Park  
Inveraray  
Argyll  
PA32 8XE

31th October 2014

Dear Sirs,

**Port Na Mine Fish Farm (Etive 3) Inverawe Taynuilt Argyll**  
**Your ref: 14/02249/MFF**

I refer to your letter of 13<sup>th</sup> October 2014.

The Argyll District Salmon Fishery Board objects to this proposed modification to the existing site on the basis of size and location, and that the modification will result in a significant increased risk to wild salmonid fish.

The proposed increase in cage number, cage size, and the addition of a feed barge will increase the level of interaction between the farm and wild fish at this narrow point in the loch, greatly increasing the risk of disease transfer from farmed to wild fish. Migrating salmon and sea trout from the River Etive, River Kinglass, River Noe, River Leiver will require to pass this farm, as well as fish from the River Awe and River Orchy, which are the largest and economically most important fisheries in Argyll. The increase in biomass sought is over 5 times the current biomass at this site, and in our opinion is far too large at this narrow point of Loch Etive. We note the applicant's calculations regarding nutrient enrichment and the environmental sensitivity of Loch Etive. While we do not doubt the accuracy of the applicant's figures, the locational guidance issued by Marine Scotland Science with regard to nutrient enrichment uses a rather crude tool that uses the entire loch area to calculate sensitivity. The hydrodynamics at the Inverawe narrows presents its own set of localised conditions not taken into account in the MSS guidance, and we are concerned about nutrient enrichment and possible algal blooms due to a 5-fold increase of biomass at this location. The flushing rates used by MSS assume a constant rate of flushing throughout the loch, which is not the case in reality at this location. We ask that further work is undertaken to ensure that unacceptable nutrient enrichment will not occur at this location should the application be approved.

Further, we are still not convinced that the applicant is able to prevent the escape of their stock from current cages. Despite assurances that no rainbow trout have escaped from any farm in either Loch Awe or Loch Etive since May 2012, rainbow trout were still regularly caught in the River Awe in the 2014. This harms the reputation of the River Awe as a salmon fishery, as well as introducing unwelcome competition for resources between native salmon and sea trout and the non-native North American rainbow trout. A rainbow trout caught in the River Awe in September 2014 was frozen and passed to the applicant for

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analysis in October to confirm when the fish was in the farm. To date we have not heard the results from the analysis.

Yours faithfully,

Craig MacIntyre  
Clerk to the Board

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