

# ARGYLL DISTRICT SALMON FISHERY BOARD

Argyll & Bute Council  
Major Applications Team

Cherry Park  
Inveraray  
Argyll  
PA32 8XE

21<sup>st</sup> April 2014

Dear Sirs,

**14/00676/MFF**  
**FINFISH FARM NEAR SHUNA ISLAND**

Thank you for your letter of 31<sup>st</sup> March 2014. The Argyll District Salmon Fishery Board welcomes the opportunity to respond to this application.

The Argyll DSFB objects to planning permission being given to this application on the basis of a significant increased risk to the health of wild salmon and sea trout from fish farm origin sea lice infestations.

In the Loch Melfort area, there are currently eight active fish farms in a relatively small, constrained area: this application would bring the total number to nine. Each farm increases the risk to wild salmon and sea trout through the normal activities of fish farms, and the Argyll DSFB would argue that there are already too many fish farms in this area. The Scottish Salmon Producers' Organisation publishes monthly counts of the number of sea lice on the farmed salmon, which gives an indication how well the farmers are able to control sea lice in the area. The latest published figures for the area in which this proposed farm will sit are for October to December 2013, and the aggregate figures published were 5.85 for October, 8.48 for November and 2.85 for December: the target for sea lice stated by the SSPO is 1 louse per fish, and demonstrates that the farmers in the area are currently not able to control sea lice on their fish to required standards. The issue for wild salmon and sea trout is that the lice on farmed fish proliferate, are dispersed from the farm into the wild where they infect wild fish, where they cause harm and even death.

It is the opinion of the Argyll DSFB that the carrying capacity of the Loch Melfort area has been exceeded in terms of impacts to wild salmon and sea trout, and that this application should be refused.

Yours faithfully,



Craig MacIntyre  
Clerk to the Board

Chairman – Roger Brook

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