



PROPOSED CHANGE TO PRODUCTION AT EXISTING TROUT FARM AT LOCH TAY

Kames Fish Farming Limited, Kilmelford, PA34 4XA

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Overview of proposed change to freshwater trout production at the Loch Tay site

Kames Fish Farming Limited established in 1972 is Scotland's only remaining family-owned trout farm and one of the most significant freshwater aquaculture businesses in the UK. The company accounts for approximately 70% of all trout sold into the UK retain and is the only trout farm in the UK to export Scottish trout internationally.

The Loch Tay site, has been operating since the 1980s, and Kames has been operating it for most of this time and consequently has extensive knowledge and experience operating in fresh water environments, particularly at this location. The site operates under an existing SEPA permit (CAR/L/1001403) and an Aquaculture Production Business Authorisation from the Marine Directorate's Fish Health Inspectorate (FB0134/FS0432). All Kames sites utilise site-specific operating procedures, which include, but are not limited to, staff training in fish husbandry and operational activities, site infrastructure and maintenance, containment, biosecurity, fish health, feed management, and Veterinary Health Working Plans.

Kames is seeking an increase in the permitted annual total phosphorus discharge into Loch Tay from the site. There would be no change to the existing infrastructure, as the proposed increase could be accommodated within the pens already at the site.

Once established, the principle environmental concern associated with freshwater cage aquaculture is the discharge of particulate wastes, medicine residues and dissolved nutrients. Phosphorus is released into the loch from uneaten food and fish faeces and Phosphorus discharge limits are regulated by SEPA. Kames has commissioned University of Stirling (UoS) to undertake routine water sampling over many years to monitor the phosphorus levels in the water body which provides baseline data for current status.

The current SEPA consent permits a Total Phosphorus discharge into the waterbody per annum, currently 2,730.7 kg per annum and we are seeking to increase this by 3,053 kg per annum. To support this application, Kames has again commissioned the expertise of the University of Stirling (UoS) to undertake integrated catchment-loch modelling. This combines catchment nutrient export modelling with loch models and is used to assess the phosphorus loading associated with freshwater fish production activities, quantifying the influence of aquaculture derived nutrient inputs relative to wider catchment nutrient sources. The historical water sampling datasets have been used to validate the model and also compared to those collected by SEPAs water sampling.

The model output predicts that the proposed increase would result in the mean TP concentrations remaining below the Water Framework Directive threshold of $12 \mu\text{g L}^{-1}$ as defined in the Scotland River Basin District (Standards) Directory 2014 and also below the SEPA conservative threshold of $8.81 \mu\text{g L}^{-1}$, thus maintaining the current water quality status. On going water sampling would continue to monitor actual phosphorus levels to ensure this is the reality.

Kames are consulting, in advance of the SEPA variation application, with NatureScot as Loch Tay is part of the River Tay Special Area of Conservation (SAC) noted for Brook lamprey (*Lampetra planeri*), Atlantic Salmon (*Salmo salar*), clear water lakes or lochs with aquatic vegetation and poor to moderate nutrient levels and otter (*Lutra lutra*). The proposed change will not require any site construction as the existing equipment will support the additional production indicated by the model. The water quality will be monitored to ensure the phosphorus levels remain within the water quality status threshold. Kames is therefore confident that this measured additional production can be accommodated in the environment without unacceptable adverse impacts.

We have had a series of pre-application discussions with SEPA in regard to our proposal. SEPA has reviewed the method statement for the UoS modelling and is content to receive our application supported by the output of the modelling for determination.