OFFICIAL

	Tell us about why you think the	Tell us about why you think the	Tell us about why you think the	Tell us about why you think the	Tell us about why you think the	Tell us about why you think the
	application will impact the water	application will impact the water	application will impact the water	application will impact on people who	application will impact on people who	application will impact on people who
	environment Q5 - open text box one	environment Q5 - open text box two on impacted habitats and species	environment Q5 - open text box three on specific chemical or substance concerns	use the water environment Q6 - open text box one	use the water environment Q6 open comment box two on impact on activities and their locations	use the water environment Q6 - open text box three on specific chemicals or substance concerns
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1	I believe that with respect to particulate pollution there is substantial uncertainty associated with the proposed increase of fish biomass. MOWI's modelling approach is not comprehensive enough to guarantee that the multitude of known impacts of particulate pollution are within SEPA's acceptable bounds. Further more detailed 3D modelling and regular sampling needs to be done to prove beyond doubt that the environment will not be adversely affected before any consideration of change to biomass is allowed. Last time the biomass increased it clearly had an adverse effect and I see no compelling evidence that this time will not be the same. This size of farm already produces 10 tonnes of CO2 per day, 1 tonne of ammonia and 200kg of phosphate. Inputs like this can promote the growth and production of biotoxins by many species of harmful algal blooms. Any increase in biomass will just make this more likely, more extensive and more harmful.	Priority marine features which are protected by current guidelines are found in the area close to the fish farm site but MOWI have not provided any evidence that the numbers are at a level for a healthy system, there is no detail about juvenille species and until there is a baseline to compare to, there is no justification in stating that therefore there is no impact from the fish farm. Local fishermen who have been living in the area for many years have witnessed recent decreases in crustaceans, molluscs and wild fish. The sea lice are having a devastating effect on wild salmon which will cumulatively gather more lice from other farms as they make there way to open water.In 2020, SEPA and NatureScot concluded that Loch Hourn is one of only twelve west coast sea lochs where any increase in the biomass of fish being farmed would put wild salmonids at the greatest risk of harm. This is because Loch Hourn's water flushes unusually slowly, so parasites (and pollution) are retained for longer in the loch than at almost any other fish farm site in Scotland. Mowi has chosen to average sea lice densities over a two-month period, which smooths out the peaks of high lice density that pose the greatest risk to fish exposed to them for a short time.	I am concerned about the increased level of chemicals-AZA and hydrogen peroxide that will be used to control sea lice. Any increase in biomass will increase the volumes used and MOWI have not sufficiently demonstrated that the levels are not harmful to other users of the loch- kayaking/swimming, wild life. The impact on lobster larvae in an area of water receiving say 8 plumes of AZA over 11 days should not only be assessed at the end of the 11 day period. There is a cumulative impact of repeatedly exposing lobster larvae to AZA pulses as each cage is treated and from multiple treatments too. It's a complex overlapping series of risks. It does not seem out of the question that lobster larvae will be killed by AZA in Loch Hourn. The precautionary principle should be used before any increase in biomass. The loch needs to be surveyed and sampled in a much wider area and over a much longer time span to clearly demonstrate it does not impact on anyone or anything. If the biomass increases, the environment is adversely affected and biodiversity is lost it may go beyond a tipping point to never recover. Norway had sea fjords devoid of life after expansion of fish farms. They are now stopping expansion and turning to on land sites. The regulations governing fish farms in Norway are stricter than in Scotland and the company is fined if any damage is found on wild fish or the environment. Scotland is being exploited for the benefit of coastal company, not have a low flushing rate before	we are very aware of the constant movement of large vessels which supply food/services to the farm. Increase in biomass will undoubtedly increase shipping as the rate limiting factor is the size of the feed barge. This is a wilderness area which is being turned into an industrial zone. Walkers, kayakers, sailors regularly visit Knoydart to enjoy this last remaining area of "wilderness" in the UK and this expansion can only be detrimental to their experience and therefore may have an effect on the tourist trade.	Noise is intrusive in areas with no roads. The MOWI boats anchor off the Croulin burn with engines running and lights on all night. This is very intrusive. This area of designated dark skies is being impacted by lights from boats and the farm.	Plastic pollution-if you visit any of the northern shores of Loch Hourn there is vast amounts of plastic debris washed ashore, much if this related to fishing and fish farm activities. Long lengths of pipework, ropes, nets etc. As many bays are not accessed by road this accumulation cannot be removed easily and it gradually UV biodegrades becoming micro plastics which then wash back in at high tides and then enter marine life food chains for evermore causing unknown long term damage. We ALL need to take responsibility for our environment, the sea is not a dumping ground. Further expansion of this fish farm is neither warranted nor safe for the marine environment.
			too much environmental damage occurs			
2	A submission has been made by email, if you wish to view this response please email registry@sepa.org.uk and request a copy. Please refer to reference CAR/L/1105276 – Loch Hourn MPFF when emailing.		that cannot be recovered.			