	Tell us about why you think the application will impact the water environment. - Q5 - open text box one	Tell us about why you think the application will impact the water environment. - Q5 - open text box two on impacted habitats and species	Tell us about why you think the application will impact the water environment. - Q5 - open text box three on specific chemical or substance concerns	Tell us about why you think the application will impact on people who use the water environment. - Q6 - open text box one	Tell us about why you think the application will impact on people who use the water environment. - Q6 open comment box two on impact on activities and their locations	Tell us about why you think the application will impact on people who use the water environment. - Q6 - open text box three on specific chemicals or substance concerns
1	District Salmon Fishery Boards have a statutory responsibility to protect and improve salmon and sea trout fisheries in their district and are statutory consultees in the planning process for fish farms. ..... there is strong evidence that Salmon smolts from rivers in Loch Linnhe & Loch Etive use the sound of Mull as a migratory route. This evidence was collected by a acoustic tracking study of smolts emigrating from the River Awe (and the River Lochy in Lochabor district) by Marine Scotland. We view that this development is inappropriate from the perspective of migratory salmonids and risks associated with the increase in potential of sea lice larvae in the Sound of Mull and for interaction between wild and escapee farm fish. There are a number of important rivers and fisheries that would be affected by the proposed increase in production at the farm site, including the River Creran in Loch Linnhe and the Rivers Awe, Kinglass and Etive in Loch Etive.	This sites lie on an important migration pathway for Atlantic salmon which some fish arising from Loch Linnhe and Loch Etive will utilise. We emphasise that both Atlantic salmon and sea trout are Priority Marine Features – the habitats and species of greatest conservation importance in inshore waters. The proposed development represent a significant additional biomass of farmed fish in an area. This will represent a significant addition of host fish for sea lice on an important migratory pathway for wild fish. It is important to emphasise that the total lice load arising from a marine fish farm is a function of the number of lice per farmed fish, and the total number of fish maintained in the cages. Maximum biomass consented via the CAR licensing system therefore has a direct influence on the number of larval sea lice released into the environment. As set out above, we therefore consider that SEPA must take the potential impacts on wild fish, and the associated impact on interests of other users of the water environment fully into account when considering this application. We also highlight the potential risk of the effects of escaped farmed salmons on wild fish populations which is widely recognised within peer reviewed scientific literature (e.g. Glover et al. 2017). A recently recorded instance at the Mowi Scotland Ltd. Carradale North site saw 48,834 farmed salmon escape during a storm event in August 2020. A study of scale samples monitored the distribution of the escaped fish and found widespread dispersion of the farmed salmon. There were documented cases of farmed fish found within 17 rivers, the majority of which were captured within the Clyde and Loch Lomond systems and a number of rivers in Ayrshire and Argyll (Fisheries Management Scotland, 2021). Scottish Government recently published the findings of study on the consequences of escapes on wild fish which demonstrate the potential for escapes to affect the genetic integrity of wild salmon populations (Gilbey et al., 2021). Therefore it is important that the potential impact of escapes fully considered in determining this CAR licence. We are conscious that SEPA, Marine Scotland, NatureScot and local authorities are developing a strategic framework related to sea lice impacts on wild fish, but this is still in development. In the meantime, the precautionary principle should apply, and .... strongly object to a licence being granted for an increase in production at this site. References J. Gilbey, J. Sampayo, E. Cauwelier, I. Malcolm, K. Millidine, F. Jackson, D. J. Morris (2021). A national assessment of the influence of farmed salmon escapes on the genetic integrity of wild Scottish Atlantic salmon populations. Scottish Marine and Freshwater Science Vol 12 No 12. Published by Marine Scotland Science ISSN: 2043-7722. DOI: 10.7489/12386-1 Fisheries Management Scotland (2021). Monitoring for the presence of farmed salmon in West Coast Scottish rivers following an escape from the Carradale North salmon farm. Glover, K. A., Solberg, M. F., McGinnity, P., Hindar, K., Verspoor, E., Coulson, M. W., Hansen, M. M., Araki, H., Skaala, Ø., & Svåsand, T. (2017). Half a century of genetic interaction between farmed and wild Atlantic salmon: Status of knowledge and unanswered questions. Fish and Fisheries, 18(5), 890–927. https://doi.org/10.1111/faf.12214		Scotland's wild salmon and sea trout are at crisis point with many populations below conservation limits, particularly on the West Coast within the 'Aquaculture zone'. Whilst wild salmon face a range of pressures, specific pressures from the aquaculture industry include impacts from escapes and sea lice. Salmon and sea trout fisheries are an important component of Scotland's rural economy. These fisheries and associated infrastructure rely on healthy populations of fish returning to Scotland's rivers. Scottish salmon rivers are categorised by Marine Scotland Science under the salmon conservation regulations according to the likelihood of them meeting their conservation limits. The gradings of rivers have been published for 2021. 104 rivers across Scotland are graded as Category 3, meaning there is a less than 60% probability of meeting their conservation limit. Where salmon populations are below their conservation limits, any additional pressure, including from sea lice, cannot be considered sustainable. ..... believe that the proposed location for this increase in production is inappropriate based on the aforementioned impacts on the water environment, which will have a knock-on effect on other water users, including fisheries managers and anglers. As mentioned previously, the impacts of sea lice and farmed fish escapes can be detrimental to the water environment. In addition to these potential ecological impacts, the escapes create a significant nuisance to fishery owners and angling businesses. We therefore consider that SEPA must take the potential impacts on wild fish, and the associated impact on interests of other users of the water environment fully into account when considering this application.		