



**The Scottish
Salmon Company**

The Registry Department
Scottish Environment Protection Agency
Graesser House
Fodderty Way
Dingwall Business Park
Dingwall
IV15 9XB

06th November 2020

Water Environment (Controlled Activities) (Scotland) Regulations 2011

Regulation 14: Request for Further Information

CAR/L/1181033 North Arran B Marine Pen Fish Farm

Dear Sir/ Madam,

The Scottish Salmon Company (SSC) is writing in response to a Regulation Notice that was served by the Scottish Environment Protection Agency (SEPA) on 06th July 2020. The notice required further information to be provided in order that determination could be undertaken of an application for a new marine fish farm, 'North Arran B' (CAR/L/11810330). The details of the requested information are provided in Annex A to this letter.

SSC hereby provides the requested information (electronic copy, as per communication with Iain Cruickshank on 03rd November 2020). All files have been uploaded directly to the shared folder location provided by SEPA.

As discussed with SEPA, SSC wishes to revise certain parts of the original application. These are:

- Change the site name from 'North Arran B' to 'North Arran';
- Reduction in pen number from 20 x 120 m circumference pens to 12 x 120 m circumference pens. No change is proposed to grid size (75 m) or net depth (10 m);
- Reduction in proposed biomass from 2,500 T to 2,300 T (please note that the original application specified an overall biomass of 5,000 T to be held across North Arran A and North Arran B sites);
- Reduction in proposed stocking density from 21.8kg/m³ to 16.7kg/m³; and
- Changes in proposed amounts of in-feed (Emamectin Benzoate) and bath (Azamethiphos and Deltamethrin) treatments.

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The changes to the application are being requested as a result of extensive discussions with SEPA. The original application, submitted under the old framework, was supported by AutoDepomod modelling and MIKE21 modelling (the latter being undertaken by independent consultants). SEPA has subsequently requested that the proposed site be modelled using NewDepomod and assessed under the new framework. As this is a new site, SEPA has requested that standard default parameters be applied in NewDepomod. Until such time as the model can be calibrated for this proposed site (using data gathered during site operation), SSC proposes to apply for the biomass predicted using the conservative Standard Default Approach.

SEPA has requested that SSC confirms that they are agreeable to an extension to the determination period of the application. SSC is agreeable to this, in principle, however requests confirmation from SEPA on the details of the proposed timeframe.

The information provided satisfactorily addresses all parts of the Regulation 14 Notice, therefore it is anticipated that application determination can now proceed.

If you wish to discuss anything further, please do not hesitate to contact us.

Kind regards,

Site Development Manager

M:



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ANNEX A INFORMATION REQUESTED IN REG 14 NOTICE (06th JULY 2020)

- Undertake a new hydrographic survey as described in section 7 of the *Regulatory Modelling Guidance for the Aquaculture Sector* document available here: <https://www.sepa.org.uk/450279/regulatory-modelling-guidance-for-the-aquaculture-sector.pdf>
- Populate the hydrographic spreadsheets available here <https://www.sepa.org.uk/regulations/water/aquaculture/pre-application/> and submit to aquaculture.modelling@sepa.org.uk for review
- Undertake NewDepomod modelling using the default settings. These are specified in Appendix A of the guidance.
 - i. Please note that the decay value for Slice can be changed from Infinity to 21600000 in the inputsFile.Particle.degradeT50Chemical setting, which corresponds to a half-life of 250 days.
 - ii. The vertical resuspension coefficient (run.physicalPropertiesFile.Transports.resuspension.walker.dispersionCoefficientgZ) should be calculated based on the mean speed at the bed (see page 21 of the guidance)
 - iii. The modelling should use flat bathymetry with a uniform depth equal to the deployment depth of the ADCP
 - iv. The previous hydrographic data had significant residual speed (i.e. a residual magnitude greater than 35% of the mean speed). If this is the case for the new hydrographic data, simulations should be undertaken using the 'raw' data set and repeated with the residual current removed. Please see page 23 of the guidance. Note that the vertical resuspension coefficient will need to be calculated separately for each of these runs.
- All files for the model runs should be submitted for review, using the directory structure specified in Appendix A of *AQUACULTURE MODELLING Regulatory Modelling Process and Reporting Guidance for the Aquaculture Sector*, available here: <https://www.sepa.org.uk/media/450278/regulatory-modelling-process-and-reporting-guidancefor-the-aquaculture-sector.pdf>
- A report containing the information about the modelling should be submitted, please see section 7 of the reporting guidance document.