

Don Staniford:

Objection to Loch Duart's application to increase tonnage and increase the use of toxic chemicals in Loch Carnan.

The following was sent to the SEPA:

Please pass onto the appropriate officer.

Please find attached an objection to Loch Duart's [application](#) to increase tonnage and increase the use of toxic chemicals in Loch Carnan.

West Highland Free Press | Friday 8 February 2013

**WATER ENVIRONMENT AND WATER SERVICES (SCOTLAND) ACT 2003
WATER ENVIRONMENT (CONTROLLED ACTIVITIES) (SCOTLAND) REGULATIONS
2011**

**APPLICATION FOR VARIATION OF AUTHORISATION
SOUTH FORD EAST MARINE CAGE FISH FARM**

An application has been made to the Scottish Environment Protection Agency (SEPA) BY Loch Duart Limited to vary water use licence number CAR/L/1088166 authorising the carrying on of a controlled activity at, near or in connection with South Ford East marine Cage Fish Farm, Loch Carnan, Isle of South Uist, as follows:

Description of controlled activity	Waters affected	National grid reference
Application to increase the tonnage at the site to 799.8t from 501.8t, increase of Chemical Therapeutants and a change to pen configuration	Loch Carnan	NF 8419 4379

SEPA considers that the above change(s) to controlled activity may have an impact on the water environment and on the interests of other users of the water environment.

A copy of the application and any accompanying information may be inspected free of charge, at the above address, between 9.30 a.m. and 4.30 p.m. Monday to Friday (except local and national holidays). Alternatively, the application may be viewed on SEPA's website at:
www.sepa.org.uk/water/water_regulation/advertised_applications.aspx

In summary, GAAIA's objection focuses on three issues: infectious diseases, chemical contamination and benthic pollution:

1) Infectious Diseases:

Loch Duart's salmon farming operations are known to be infested with sea lice and infectious diseases such as Epitheliocystis (Chlamydia), Salmonid Alphavirus (Pancreas Disease) and Vibrio.

Business Name	Site name	Results Type Name
Loch Duart Ltd	Lochmaddy	Salmonid alphavirus
Loch Duart Ltd	Lochmaddy	Epitheliocystis
Loch Duart Ltd	Lochmaddy	Vibrio species



In July 2012, following a FOI request, Marine Scotland also [revealed](#) that escapees from Loch Duart's operations in Lochmaddy in December 2011 had "some Amoebic Gill Disease" Read more via "[Gill Diseases: Scottish Salmon's Dirty Big Secret](#)" and access FOI data on AGD cases via <http://salmonfarmingkills.com/gill-diseases>

Read more details via "[Fit for the Queen & Residents of Nova Scotia - Loch Duart's Chlamydia-Contaminated Salmon?](#)"

2) Chemical Contamination:

Loch Duart is already guilty of using huge quantities of toxic chemicals including the lethal chemical Teflubenzuron – a chemical known to kill shellfish such as lobsters (read more details [online here](#)).

According to SPRI data supplied by SEPA, Loch Duart was the fifth largest user of toxic chemicals in Scottish salmon farming using a total of 89350.988g in the period 2008-2011 – including 53490g of the organophosphate Azamethiphos; 23555.1g of the insecticide Teflubenzuron, 5949.538g of the pesticide Emamectin benzoate; 3565.5g of the lobster-killing Cypermethrin; and 2790.85g of the bath treatment Deltamethrin.

In the period 2008-2011, Loch Duart used toxic chemicals 282 times – including Deltamethrin (100 times), Cypermethrin (71 times), Azamethiphos (64 times), Emamectin benzoate (41 times) and Teflubenzuron (6 times).

Data obtained from SEPA and presented by the [Pure Salmon Campaign](#) at the [Salmon Aquaculture Dialogue](#) meeting during the Seafood Summit in 2008 revealed that Loch Duart was one of the biggest users of both Cypermethrin and Emamectin benzoate:

**Reported Excis (Cypermethrin) Use by
Farmed Salmon Producers in Scotland in 2006**

Company	Reported Excis Use (l)
Marine Harvest Scotland	559.6
Pan Fish Scotland Ltd	155.4
Fjord Seafood Scotland	125.2
Scottish Seafarms Ltd	81.7
Loch Duart Ltd	48.8
Drumbeg Salmon Ltd	41.8
Hoganess Salmon Ltd	13.6
Lakeland (Marine & Unst) Ltd	2
Lewis Salmon Ltd	0.6

Source: SEPA

**Top 10 Reported Use of SLICE (emamectin benzoate)
Per Tonne of Feed Used in 2006**

Rank	Company	Site	Slice (kg)/ tonne feed used
1	NAFC	Lea of Trondra	1,067
2	Drumbeg Salmon Ltd	Loch Droighniche	415
3	Pan Fish Scotland Ltd	Mid Strome	395
4	Scottish Sea Farms (Main) Ltd	Allt a Chois, North Shore	385
5	Fjord Seafood Scotland	Vacasay	367
6	Drumbeg Salmon Ltd	Oldany Island	356
7	Loch Duart Ltd	Foindle East, Site 1	331
8	Loch Duart Ltd	Eilean a Mhadaidh, Site 2	322
9	Loch Duart Ltd	Calbha Beag, Site 5	286
10	Fjord Seafood Scotland	Kyles Vuia East	276

Source: SEPA

Read more via [‘Gaining Transparency: Using the FOI process to track down data on the impacts of fish farming’](#)

Another 2007 report from Pure Salmon Campaign detailed how Loch Duart was the #1 user of Cypermethrin per tonne of feed (a measure of production):

2005 Reported Excis Use Scottish Salmon/Fish Farms					
Rank (Absolute)	Company	Excis (litres) containing 1% cypermethrin	Excis Use - % of Scottish Total Use	Excis (l) Used/ tonne Feed Used	Excis Normalized Rank (g slice/kg feed)
1	Marine Harvest	205.6	31	0.005	5
2	Pan Fish Scotland Ltd	189.13	29	0.009	3
3	Scottish Sea Farms (Main,Shet)	108.66	16	0.004	6
4	Loch Duart Ltd	50.25	8	0.017	2
5	Drumbeg Salmon Ltd	49.16	7	0.024	1
6	Lakeland (Marine & Unst)	24.3	4	0.002	9
7	Fjord Seafood Scotland	20.8	3	0.003	8
8	Kames	7.4	1	0.007	4
9	Wester Ross	4.5	1	0.004	7
	TOTAL	660			

78 % of companies reported NO Excis use in 2005

The “Sustainable Salmon Company”, Loch Duart (and its subsidiary Drumbeg Salmon), was the highest user of Excis per tonne of feed in 2005

Read more via [‘Scottish Farmed Salmon Exposed’](#)

Read more details via [‘Loch Duart – The Toxic Salmon Company’](#)

3) Benthic Pollution:

SEPA has already published reports on benthic contamination of the sea-bed under salmon farms – including contamination with PCBs, Teflubenzuron, Emamectin benzoate and Cypermethrin. More information is contained in the following survey reports: “The Occurrence of Chemicals used in Sea Lice Treatments In Sediments Adjacent to Marine Fish Farms”

[Results of Screening Surveys During 2009](#) 📄(459k)

[Results of Screening Surveys During 2008](#) 📄(557k)

[Results of Screening Surveys During 2006](#) 📄(260k)

[Results of Screening Surveys During 2005](#) 📄(597k)

[Results of Screening Surveys During 2004](#) 📄(124k)

[Results of Screening Surveys During 2003](#) 📄(191k)

Available online via SEPA's [web-site](#)

In conclusion, permitting Loch Duart to increase production and increase the use of toxic chemicals in Loch Carnan is an open invitation to the spread of infectious diseases, benthic pollution, parasitic infestations and chemical resistance. If SEPA authorizes the application then they would be derelict in their statutory duty to protect the environment.

Please provide an electronic receipt for this objection.

Thanks,

Don Staniford

Global Alliance Against Industrial Aquaculture