Response ID ANON-SUQ6-CQPA-M

Submitted to CAR/L/1078064 - MOWI Scotland Limited: Carradale (South) MPFF
Submitted on 2024-04-12 16:45:54

Introduction

1 What is your name? (optional)

Name:
Community of Arran Seabed Trust (COAST)

2 What is your email address? (optional)

Email:
email@arrancoast.com

3 What is your interest in this consultation?

Not Answered

Other:
Community-led marine conservation charity

4 Are you happy for us to publish your response to this consultation?

Yes

Impact on the water environment

5 Tell us about why you think the application will impact the water environment.

Add your comments in the box below. :

We object to the application by MOWI to double the amount of Azamethiphos that can be used at Carradale Marine Pen Fish Farm. This is a toxic organophosphate pesticide that SEPA should be seeking to reduce and remove its discharge into the marine environment not to permit increased quantities to be used and discharged into the sea.

An application to increase the amount of Azamethiphos used clearly indicates there is a significant problem with sea lice that treatments with lesser amounts of this chemical are not addressing. It is unacceptable that the proposed response to address this is to put greater amounts of toxic chemical into the sea.

Environmental monitoring requirements associated with CAR licence requirements are not sufficiently robust to monitor the toxic harm from this sort of chemical in the marine environment. There is sufficient evidence about the toxic effects of such chemicals to warrant a much more precautionary approach, not a doubling of the quantity that can be used.

We see no evidence that the requirements of Section 15 (b)(i-iii) and 15 (c) of the Water Environment (Controlled Activities) (Scotland) Regulations 2011 have been addressed in relation to this application. Section 15 makes it clear that determination of a CAR licence must take into account both direct and indirect impacts on the environment and must consider social and economic impacts and benefits and also assess the impacts on other users of the water environment.

Add your comments in the box below. :

All species within the marine ecosystem including larval and juvenile stages.

Add your comments in the box below. :

Azamethiphos – a toxic organophosphate chemical

Add your files and documents below:
No file uploaded

Impact on people who use water environment

6 Tell us about why you think the application will impact on people who use the water environment.

Add your comments in the box below. :

Organophosphorous compounds are known to be toxic to human health with numerous reports linking these chemicals to various forms of neurodegenerative, psychological and neurobehavioural effects, with mounting evidence that sub-acute levels of chemicals have a harmful effects at

molecular and cellular levels.

With increasing use of marine waters for recreational activity there is increased likelihood of individuals coming into contact with these chemicals when they are used as treatments in open cage fish farms.

We see no evidence that the requirements of Section 15 (b)(i-iii) and 15 (c) of the Water Environment (Controlled Activities) (Scotland) Regulations 2011 have been addressed in relation to this application. Section 15 makes it clear that determination of a CAR licence must, along with other considerations take into account both direct and indirect impacts on the environment and must assess the impacts on other users of the water environment. This has not been addressed in relation to this application.

Add your comments in the box below. :

Any activities on the shore or in and on the water

Add your comments in the box below. :

Azamethiphos – a toxic organophosphate chemical

Add your documents in the box below. :
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