**Company comment:**

Scottish Sea Farms Head of Sustainability & Development Anne Anderson said: *"Protecting the water quality and rich biodiversity of Loch Creran is in all our interests and is something best achieved by looking to the available science, which on this specific subject is provided by NatureScot and points to serpulid reefs having a natural lifecycle of growth and collapse, as documented in other Scottish lochs.*

*"The same scientific research shows that younger serpulid reefs are still present within the loch, as are other sensitive designated features including horse mussel beds and flame shell beds, all of which require high quality water to survive. This is a vibrant loch. Quite simply, the expert independent opinion doesn't support the campaigners' hypothesis and it's misleading to suggest otherwise.*

*"It's also important to bear in mind that we've been farming in Loch Creran since 1988, regularly receiving a SEPA environmental rating of 'Excellent' or 'Good', and that, of all the different activities that take place in or around the Loch, salmon farming is the most rigorously regulated by SEPA and Marine Scotland."*

**Notes for Editors:**

- Scottish Sea Farms has operated a salmon farm on Loch Creran since 1988
- 13 years later, in 2001, Loch Creran itself was proposed as a protected area on the grounds that its special features – including bush-like structures made up of hundreds of individual worm tubes, known collectively as serpulid reefs – were considered to be 'in favourable condition'
- The Loch went on to be designated formal Special Area of Conservation (SAC) status in 2005
- Serpulid reefs inhabit a different area of the loch to that of our farm discharges
- In its 2020 research report, 'The current status of serpulid reefs, horse mussel beds and flame shell beds in Loch Creran SAC and MPA', Scottish Natural Heritage (now NatureScot) finds: "*the nature of the broken reef material throughout much of the loch clearly indicates that the major process of degradation has been brought about by natural collapse of reef structures, rather than by physical contact. Evidence of these types of anthropogenic impact was already present in 1994 (Moore, 1996) and 2005 (Moore et al., 2006). Since then it is known that anchoring by yachts*

*has taken place in South Creagan Bay (Moore. pers. obs.) and this may explain why this previously pristine reef site is now possibly the most degraded region of the loch, with the reefs now reduced to rubble. No other clear examples of anthropogenic damage since 2005 have been identified during the current study."*

- The same research report continues: *"It is also a corollary of this thesis that the life cycle of serpulid reefs in the loch is limited, such that there may have not been continuity in their presence from the earliest record of 1882 (Smith, 1887) to the present day." (P85)*
- Reinforcing this finding, the NatureScot website states: *"We now believe that serpulid reefs go through natural cycles of growth and collapse. Individual structures eventually get so large that they can no longer support themselves."*
- Loch Creran is not the only site where serpulid reefs have been found. As the NatureScot research report states, they have also been found in Linne Mhuirich where they also declined. Similarly, the serpulid worms that can develop into reefs were also found in Loch Teacuis – now part of the Loch Sunart Marine Protected Area – but have since declined
- In the years since Loch Creran was designated protected status:
  - The biomass at our Loch Creran farm has remained unchanged (1,500 tonne maximum biomass)
  - The farm has maintained overall environmental compliance throughout
  - The seabed around our Loch Creran farm has been assessed as 'Satisfactory' based on regular benthic surveys
  - Copper antifoulant (commonly found on marine infrastructures and vessels to prevent growth) has not been used since 2017
- In addition to our Loch Creran farm itself, Scottish Sea Farms operates two other facilities on the shores of Loch Creran: our long-standing processing facility at South Shian and new Barcaldine Hatchery
- All three facilities – farm, processing facility and hatchery – are subject to the Water Environment (Controlled Activities) (Scotland) Regulations, more commonly known as the Controlled Activity Regulations (CAR)
- Related to this, extensive water sampling with Loch Creran undertaken as recently as 2021-22 indicated dissolved nitrogen levels of just 0.16 to 8.41 umol/litre which is comparable with results from as far back as 1975 and well within the present day best in class water quality standard of below 12 umol/litre (Water Framework Directive)
- Helping maintain this, all water is treated prior to being discharged via an outflow pipe shared with the local caravan park

- An application to install a new outfall pipe, modelled with and formally agreed by SEPA, is currently with Marine Scotland to take Scottish Sea Farms' discharge beyond compliance
- Looking ahead to Scottish Sea farms' proposed extension to Barcaldine Hatchery, nutrient modelling indicates that levels would remain safely within these same Water Framework Directive standards

**Corrections to the film's claims:**

- There were four – not nine – occasions before 2012 where levels of emamectin benzoate at our Loch Creran farm exceeded environmental quality standard (EQS) limits. Since then, three sets of samples have been collected in 2015, 2017 and 2019, each of which has been fully compliant, highlighting that a breach is not evidence of environmental harm
- The alleged footage of copper-based anti-foulant being power-washed into the Loch is, in fact, simply our farm team power-washing (with water, no chemicals or antifoulant) marine growth off pens
- The Thermolicer treatment shown in the film uses no veterinary medicines or chemicals, only seawater raised to lukewarm temperature
- The organic waste produced by the farm in any one year – quoted as being 600t of faeces – is less than half that; a precautionary limit set and regulated by SEPA based on modelling that indicates what the marine environment can assimilate and break down
- Regular effluent sampling and analysis from 2020-22 indicates that dissolved inorganic nitrogen discharges from Barcaldine Hatchery have been compliant with SEPA CAR licence conditions
- In September 2021, SEPA issued a variation to an existing licence, informing NatureScot as part of that process, as opposed to a new licence with no consultation as stated in the film