Loch Tay Association — SEPA Consultation Objection

Application: APP2026-00001781 — Kames Fish Farming Limited, Loch Tay
Consultation closes: 13 August 2026

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1. Why do you think this application will impact the water environment?

The application seeks to more than double the permitted phosphorus discharge from this site (from 2,730.7kg to 5,783.7kg per year, a 112% increase) to support a significant expansion in trout production. Loch Tay's overall water quality was classified as only "moderate" in SEPA's own 2024 assessment. Phosphorus is the key limiting nutrient driving eutrophication in freshwater lochs, and a discharge increase of this scale, from a single point source, risks tipping the loch's nutrient balance toward more frequent and severe algal blooms, reduced water clarity, and oxygen depletion at depth. We do not believe the applicant's modelling, based on projected outcomes rather than observed real-world performance, provides sufficient certainty that a loch already at "moderate" status can absorb more than double the phosphorus loading without breaching Water Framework Directive objectives.

2. Species or habitats you think may be impacted, including location if known

Loch Tay supports Atlantic salmon and native brown trout populations, both of which are sensitive to nutrient enrichment and reduced oxygen levels, particularly in spawning tributaries and shallower margins near the site. The loch also holds freshwater pearl mussel populations, which are highly sensitive to water quality and siltation and are a protected species. **[Add specific location detail here if available — e.g. proximity to a named spawning burn, SAC/SSSI boundary, or mussel bed near the farm]**. We are also concerned about the risk to native wild fish stocks from farmed fish escapes: expanding stocked biomass and netted infrastructure at the site increases the inherent risk of future escapes, which can compete with and affect native populations.

3. Specific substance or chemical you are concerned about

Our primary concern is phosphorus, given the scale of the proposed increase (112%) and the loch's already "moderate" water quality status. We would also ask SEPA to give scrutiny to the application's proposed use of additional chemicals at the site, including Hypofoam detergent and Divosan disinfectant, and to confirm what assessment has been made of their combined and cumulative effects on the water environment alongside the increased nutrient loading.

Note: Fill in the bracketed location detail in Q2 before submitting if available — it strengthens the objection.