PE2109/D: Halt any further pump storage hydro schemes on Scottish lochs holding wild Atlantic salmon

Statkraft written submission, 10 January 2025

In response to the Citizen Participation and Public Petitions Committee letter (dated 06 December) requesting pumped storage hydro (PSH) developers to share available research studies regarding cohabitation between PSH projects and wild salmon populations in the Loch Ness region, please find relevant information pertaining to this request at Points 1 and 2 below.

For background, Statkraft is a responsible and well-established renewable energy developer in Scotland with an acute focus on ensuring that our projects protect the natural environment and enhance biodiversity. Alongside our multi-technology footprint and development pipeline across wind, grid stability, pumped storage hydropower and green hydrogen in Scotland, Statkraft has been developing and operating large-scale hydro schemes in Norway and across the world since 1895. We currently operate 363 hydropower plants globally with a total installed capacity of 15,541MW.

As the largest producer of hydropower in Europe, we are proud to be leveraging our expertise and experience to ensure that the consented Loch na Cathrach PSH project is developed in a sensitive and environmentally conscious manner. We are committed to sharing all available information and partnering with local and national stakeholders to ensure wild Scottish salmon populations are carefully protected and nurtured during the construction and operation of Loch na Cathrach.

This commitment is underpinned by the terms of the Loch na Cathrach Scottish Government project planning consent issued in June 2021 *(Energy Consents Unit letter Ref: ECU00000728, dated 07 June 2021)*. Statkraft is on course to discharge the relevant environmental condition set out in the overall 2021 project consent in close working partnership with Scotland's nature agency NatureScot to ensure the protection of wild salmon populations in the Highlands (detail at Point 1). To discharge this planning condition, Statkraft is currently working with Brian Shaw, River Director of the Ness District Salmon Fishery Board, and are due to collaborate on a smolt tracking study to provide further data on PSH impacts. See more information at Point 2 on this study.

We hope the below detail is informative as you assess the impact of pumped storage hydro developments on wild Atlantic salmon population and migrations in the Highlands region.

1. **Overall Environmental Impact Assessment (EIA) as part of Loch na Cathrach consent**

As noted above, please find at this **weblink**[1] Loch na Cathrach's full EIA documents which form a core part of the project's consent from the Scottish Government in June 2021. Specifically see Vol 2 - Chapter 7, Vol 5 - Appendix 7.1 and Vol 5 - Appendix 17.1 for more information on how the Loch na Cathrach project complies with requirements around wild salmon cohabitation. Due to Statkraft acquiring the Loch na Cathrach project in 2023 from Intelligent Land Investments Group (ILI), the EIA consent documents are in PDF format only. Please do let us know if this is an issue.

2. **Fish passage assessment survey partnership with Ness District Salmon Fishery Board**

During the Loch na Cathrach planning approval process, the Section 36 consent letter included an agreement that a "Fish Passage Assessment including a smolt tracking survey" be carried out. Statkraft and Ness District Salmon Fishery Board (NDSFB) have been in discussions to design, fund, run and publish the findings of the above study. See more information below with a caveat that the specific terms and parameters of the study are yet to be confirmed.

> The prospective Loch Ness/Loch Dochfour smolt tracking study will focus on investigating smolt migration downstream from Loch Dochfour. Potential partners – which may be expanded – are Ness District Salmon Fishery Board (NDSFB), Scottish Centre for Ecology and the Natural Environment (SCENE), Scottish Canals and Statkraft. The study (pending confirmation) will identify a baseline for salmon smolt passage in the Dochfour Weir area, pre-construction of the Loch na Cathrach PSH. This is aimed to provide high resolution data on smolt movements in the vicinity of the River Ness/Caledonian Canal bifurcation.
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> Smolt movements will be established using acoustic tracking of tagged salmon smolts during the downstream migration, with smolts captured from one of the main Loch Ness spawning tributaries, fitted with acoustic tags, recuperated, then trucked and released into the upstream end of Loch Dochfour.

Once finalised and to provide further substantive evidence on the impact of PSH on salmon populations, we would be delighted to share the results of this study with the Committee, as well as wider stakeholders including the Scottish Government, once it is complete.

The above is the current extent of research Statkraft holds on impact of PSH on wild salmon populations.

I hope this information is helpful and we would be pleased to answer any questions you may have as you continue your inquiries into this important topic.

[1] Planning application documents | Loch na Cathrach Pumped Storage Hydro - Statkraft UK