

## FINFISH AQUACULTURE SECTOR

### 1. Background

- 1.1 SEPA has issued our [COVID-19 philosophy](#) that confirms that SEPA's focus will be to make our best contribution to helping our nation get through this public health emergency in a way that protects and improves Scotland's environment.
- 1.2 SEPA recognises that during a significant outbreak of COVID-19 the ability of operators to run their operations may be compromised by a lack of available staff, and/or the need to protect staff and minimise transmission of the COVID-19 virus.
- 1.3 SEPA is clear we expect everyone we regulate to make their best endeavours to meet their environmental obligations. We expect operators to be ensuring that the impacts of COVID-19 on the environment are minimised. We recognise, however, that in some cases operators may be unable to comply for reasons beyond their control.
- 1.4 SEPA has adopted [overarching guidance](#) setting out our position on compliance, enforcement, monitoring and permitting during the COVID-19 outbreak. This guidance applies to all regulated businesses. We recognise however that in some cases, more specific temporary regulatory positions may also be needed. For such cases we have developed [Principles](#) for determining where a specific Temporary Regulatory Position Statement may be necessary.
- 1.5 We have adopted this temporary regulatory position on finfish aquaculture. This temporary regulatory position statement will be published on [SEPA's COVID-19 hub](#) on our website.

## 2. SEPA position

- 2.1 This regulatory position applies to marine and freshwater finfish aquaculture sites.
- 2.2 SEPA expects all operators in the finfish aquaculture sector to manage their farms and hatcheries during the period of the COVID-19 outbreak to minimise the risk of harm to the environment as far as possible.
- 2.3 The regulatory position describes how and in what circumstances operators may temporarily operate under the conditions of the position.
- 2.4 This temporary regulatory position statement only applies to those matters set out in Section 3. It does not apply to any other regulatory requirements and does not detract from any other statutory requirements applicable to the holder of the environmental authorisation or their operations
- 2.5 This temporary regulatory position applies from 24 March 2020.
- 2.6 The operator should confirm to SEPA in writing at the reporting address specified in the authorisation within five days of returning to compliance following any breaches of the monitoring, fallow and biomass conditions provided for under this regulatory position.

## 3. Conditions that apply

### Monitoring-related conditions

- 3.1 SEPA understands that the ability of operators in the finfish aquaculture sector to collect environmental samples within the window of time required by their authorisations may be compromised by a lack of available staff due to the outbreak. Similarly, SEPA recognises that the ability of operators in the sector to ensure samples are analysed and reported within the period of time specified in their authorisations for reporting may also be compromised due to the outbreak.

3.2 Any failure to comply in full with monitoring-related conditions due to the outbreak will not be treated as a non-compliance when reporting on operator compliance or for enforcement, provided that:

- (a) SEPA is notified in advance on a site-by-site basis of such non-compliances and provided with a suitable explanation as to why the outbreak prevented compliance;
- (b) available monitoring capacity during the outbreak period is prioritised on sites that are operating under SEPA's new regulatory framework for marine finfish farms; sites at which biomass limits are exceeded in accordance with this regulatory position (see Section 3 below); sites not previously monitored; and sites that failed environmental standards when last monitored.

### **Fallow period conditions**

3.3 SEPA recognises that postponements to harvests during the COVID-19 outbreak may be required due to staff availability. SEPA also understands that, due to the outbreak, operators in the sector may require to hold fish at sea for longer periods and put smolts out to sea earlier due to a reduction in availability of processors or access to markets.

3.4 The operation of farms with shortened fallow periods or with fish held at sea for longer than the maximum time specified in authorisations will not be treated as non-compliances when reporting on operator compliance or for enforcement, provided that SEPA is:

- (a) notified in advance on a site-by-site basis;
- (b) provided with a suitable explanation as to why the outbreak prevented compliance.

## **Biomass limits**

- 3.5 SEPA recognises that postponements to harvests during the COVID-19 outbreak may be required due to staff availability and that this may create challenges for operators to stay within biomass limits and associated stock density conditions. SEPA also recognises that operators may require to hold fish for longer than normal in pens due to reduced fish processing capacity or reduced access to markets.
- 3.6 Temporary breaches of biomass limits specified in authorisations will not be treated as non-compliances when reporting on operator compliance or for enforcement, subject to operators:
- a) taking all practical steps to minimise the scale of exceedance of the limits, such as adjusting feeding strategies; re-locating fish if possible, taking account of fish health considerations; and grading out fish where feasible;
  - b) except where it is not possible for reasons due to the outbreak, organising available capacity to harvest and process fish such that:
    - (i) biomass limits are only exceeded at sites at which, based on an environmental risk assessment, the likelihood of environmental harm is low;
    - (ii) biomass is maintained within biomass limits at sites where environmental risk resulting from exceeding the limits is greatest;
  - c) notifying SEPA on a site-by-site basis in advance of any exceedance of biomass limits occurring and providing SEPA with a suitable explanation, relating to the outbreak, as to why the exceedance is necessary and how the operator is ensuring that the risk of harm to the environment is minimised.

## General conditions

- 3.7 You must notify SEPA without delay if you cannot comply, or think you may not be able to comply, with the conditions in this temporary regulatory position statement.
- 3.8 You must take all such measures as are reasonably practicable to prevent and, where prevention not possible, minimise and mitigate any impacts on the environment which result from the non-compliance with the requirements specified in Section 3.
- 3.9 You must keep records to show that you have complied with the conditions in this temporary regulatory position statement for 12 months from the date this temporary regulatory position statement was issued – these must be made available to SEPA on request.
- 3.10 In the event that, due to changing circumstances, you become able to comply with the requirements of your environmental authorisation or other regulatory requirements as set out above, you must return to compliance as soon as possible, notwithstanding that this temporary regulatory position statement remains in place.
- 3.11 This position statement applies only in Scotland.
- 3.12 This temporary regulatory position statement only applies where non-compliance is unavoidable and a direct result of emergency resulting from COVID-19 outbreak
- 3.13 The terms of this temporary regulatory position statement may be subject to periodical review and may be varied or withdrawn at any time. SEPA will provide notice in advance to the Scottish Salmon Producers Organisation (SSPO) and the British Trout Association of its intention to vary or withdraw this position.
- 3.14 SEPA reserves its discretion to depart from this temporary regulatory position statement and to take appropriate action as necessary.

**Notes:**

- (a) The appendix to this position statement provides guidance to operators on how the simple environmental risk assessments referred to above might be undertaken.
- (b) SEPA will work with the SSPO and the British Trout Association on practical notification arrangements under this regulatory position.
- (c) SEPA is happy to discuss specific issues with operators relating to the operation of their farms during the outbreak.
- (d) Changes to fallow periods, stock densities; the duration over which fish are held in pens; and to other farm management practices, such as re-locating fish, can have implications for fish health. SEPA will work jointly with the Fish Health Inspectorate when engaging with the sector regarding this regulatory position and parallel advice on advice on fish health.

## APPENDIX

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### Guidance for finfish farm operators: Carrying out environmental risk assessments in relation to temporary exceedances of biomass limits

#### 1. Introduction

- 1.1 A condition of SEPA's temporary regulatory position in relation to biomass limits is that all efforts are made by operators to minimise the risk of harm to the environment as far as possible and ensure biomass is maintained within authorisation limits at sites where the environmental risk resulting from exceeding those limits is greatest.
- 1.2 This environmental risk assessment guidance is for use by operators of marine and freshwater loch finfish farms to help them minimise the risk of harm to the environment by identifying differences in the likely risk posed by biomass limit exceedances at different farms.
- 1.3 It has been developed with help and advice from Scottish Natural Heritage (SNH) and in consultation with the Scottish Salmon Producers Organisation, British Trout Association and representatives from individual finfish producers.
- 1.4 The guidance has been designed to be as simple as possible to enable operators to undertake the rapid assessments needed, given the challenges of the COVID-19 public health emergency.

## 2. Guidance

2.1 Environmental risk assessments should be proportional to the risk of harm but should take into account:

- (a) the degree by which the biomass limits are exceeded;
- (b) the past environmental performance of the farm;
- (c) the environmental characteristics and sensitivities of the farm location.

2.2 We are happy to discuss any aspect of the guidance with operators or particular sites at which a modified approach may be warranted.

### Marine finfish farms

2.3 Table 1 provides guidance on the principal factors that should be taken into account when undertaking environmental risk assessments for marine finfish farm sites.

2.4 Local characteristics or sensitivities may increase or decrease environmental risks at individual marine finfish farm sites. The key local characteristics/sensitivities that should be considered include:

- (i) proximity to mapped locations of sensitive seabed features protected for their conservation importance (see guidance in Annex 1);
- (ii) during the relevant smolt migration periods, the proximity of the farm to any river special area of conservation (SAC) or site of special scientific interest (SSSI) designated for freshwater pearl mussels or Atlantic salmon and the scale of the biomass increase (see Annex 2);
- (iii) The fish health history of the farm.

**Table 1: General environmental risk assessment criteria: temporary breaches of biomass limits at marine finfish farms**

Factors affecting risk posed by biomass increase	Increase above authorised biomass limits			
	No increase	Up to 10%	Up to 20%	Up to 25%
Interaction potential of area in which farm located (during smolt migration period only <sup>(a)</sup> )	High	Medium	Low/not yet categorised	Low/not yet categorised
Pen edge standard performance in last production cycle	Fail	Pass	Pass	Pass
Allowable zone of affect (AZE) limit standard	Fail - as default <sup>(c)</sup>			
Dispersion characteristics <sup>(b)</sup>		Low <ul style="list-style-type: none"> <li>• bed mean current speed &lt; 6 cm/s;</li> <li>• wave exposure index &lt; 2.8</li> </ul>	Medium <ul style="list-style-type: none"> <li>• bed mean current speed <math>\geq</math> 6 cm/s</li> </ul> Or <ul style="list-style-type: none"> <li>• Bed mean current speed &lt; 6 cm/s;</li> <li>• wave exposure index <math>\geq</math> 2.8</li> </ul>	High <ul style="list-style-type: none"> <li>• bed mean current speed &gt; 12 cm/s</li> </ul>
Modelling results (farms on new regulatory framework only)		Modelled to maximum mixing zone capacity (pen edge or 100 metre mixing zone extent)		

**Notes to Table 1:**

- (a) Guidance on the interaction potential of selected sea lochs is provided in Annex 3. Salmon smolt migration period is typically April and May. In Shetland, critical period for sea trout should be assumed to be May, June and July. The relevant fisheries organisation may be able to advise if a shorter period is locally applicable.
- (b) For wave exposure, go to: <http://marine.gov.scot/information/wave-exposure-index> Click on: 'Access this map on NMPi'. When the layer is loaded, click on the location that matches the site's location. Be aware of sites that appear on the layer to have high wave exposure but are, in reality, sheltered locations. If this is the case default to 10%.
- (c) A temporary increase in biomass at sites that had AZE limit standard failures in their last production cycle may not indicate high risk in all cases. Risk assessments should consider the location of the AZE (i.e. is it less than 100m from the farm and if so, how much less?), the dispersion characteristics of the site (i.e. is it a medium or high dispersion location or a low dispersion location), and other relevant local factors.

## **Freshwater sites**

- 2.5 For finfish aquaculture sites discharging into freshwater loch sites, the primary environmental risk associated with holding fish longer than normal at greater biomass is from increased inputs of plant nutrients, in particular phosphorus.
- 2.6 Increased plant nutrient inputs can lead to accelerated growth of plants with subsequent cascading consequences for the functioning of the ecosystem.
- 2.7 The regulatory position is temporary. Any increases in nutrient loadings resulting from farms holding higher biomasses of than normal is not expected to pose a significant long-term risk to the ecological health of most of the freshwater lochs concerned.
- 2.8 The environmental risk depends on how close the individual lochs are to a tipping point in their nutrient balance.
- 2.9 Annex 4 lists the freshwater lochs at greatest risk from temporary increases in the biomass held at farms and increased phosphorus inputs. These are freshwater lochs with limited capacity to accommodate additional phosphorus inputs. They comprise lochs where:
- (a) 90% or more of their capacity to accommodate inputs of phosphorus (from all sources, not just fish farms) is already being used;
  - (b) capacity to accommodate phosphorus has recently been exceeded and action is needed to reduce nutrient inputs to protect them;
  - (c) the loch is showing evidence of ecological stress associated with elevated nutrient inputs.

## Record keeping and reporting

2.10 Operators should document, and keep records of, the risk assessments they undertake.

2.11 The regulatory position requires operators to provide SEPA with a suitable explanation as to how they are ensuring that the risk of harm to the environment is being minimised. We recommend operators report this information to us when making their normal biomass returns for the first period in which the biomass limit is exceeded. The recommended format is:

- (a) a simple checklist of the criteria in columns 2, 3, 4 and 5 of Table 1 and columns 2 and 3 of Table 2 that apply to the site;
- (b) where any other factors have been taken into account, or the default criteria in Tables 1 or 2 have been modified, a list of the other factors or modifications, a brief summary of the reasons for considering the other factors or modifying the default criteria, and a note of how doing so affected the risk assessment.

## Annex 1

### Environmental risk criteria: sensitive seabed features

In the majority of cases, existing fish farms will be sited in locations that are not expected to pose a risk to sensitive seabed features protected for their conservation importance.

A list of the most sensitive seabed features is provided in Table 3. Guidance on assessing risk to these features is provided in Table 2.

#### Approach

All else being equal, environmental risk is likely to be lowest where the magnitude by which biomass limits is exceeded is very small and the exceedance lasts for only a very short period. Risk will tend to be greatest where the magnitude of the exceedance is large and continues for an extended period. Risk assessment approaches should be proportional to the likely risk.

Risk assessment approaches should take account of the operator's knowledge of the environmental setting of the site, including information from any visual surveys undertaken to support previous permit applications for the site and any information on protected sensitive seabed features such surveys may have produced.

Information on NMPi on the locations of the sensitive seabed features listed in Table 3 should be used for the assessments. This information can be found at the following link<sup>1</sup>:

<https://marinescotland.maps.arcgis.com/apps/View/index.html?appid=1f2041205c39472683c30e4c61f48c2c>

Operators could use a broad scale spatial analysis as a first step to identify the subset of their farms where proximity to sensitive marine features important for nature conservation should be examined in more detail.

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<sup>1</sup> The link may be slow to open as it opens multiple mapping layers. The individual layer information can also be accessed via the links given in Table 3

**Table 2: Environmental risk assessment criteria: Sensitive seabed features protected for their conservation importance**

Approximate proximity to a location at which a sensitive marine seabed feature (see Table 3) has been identified	Increase above authorised biomass limit	
	No increase	Up to 10%
	<p><u>Feature very close:</u> Closer than 50 metres beyond the allowable zone of effect (AZE)</p> <p>For sites on new (post-June 2019) permits, closer than 50 metres beyond 100 metre mixing zone limit</p>	<p><u>Feature close:</u> Further than 50 metres but closer than 150 metres beyond AZE</p> <p>For sites on new (post-June 2019) permits, further than 50 metres but closer than 150 metres beyond mixing zone limit</p>

**Note to Table 2**

Assessment distances should be increased to a minimum of 100 m and 200 m respectively for sites that failed their AZE/mixing zone edge seabed standard when last monitored.

**Table 3: List of seabed features most sensitive to finfish culture**

Sensitive seabed feature	Links to the individual NMPi layer for each feature
	Note: Where the link below is to a Marine Scotland information page, the NMPi information on the feature can be found by clicking the 'Access this map on NMPi' link in the bottom right corner of the landing page
Maerl beds	<a href="http://marine.gov.scot/node/12709">http://marine.gov.scot/node/12709</a>
Flame shell beds	<a href="http://marine.gov.scot/node/12699">http://marine.gov.scot/node/12699</a>
Horse mussels beds	<a href="http://marine.gov.scot/node/12714">http://marine.gov.scot/node/12714</a>
Blue mussel beds	<a href="http://marine.gov.scot/node/12713">http://marine.gov.scot/node/12713</a> ;
Northern sea fan and sponge communities	<a href="http://marine.gov.scot/node/12659">http://marine.gov.scot/node/12659</a>
Seagrass beds	<a href="http://marine.gov.scot/node/12655">http://marine.gov.scot/node/12655</a>
Fan mussels aggregations	<a href="http://marine.gov.scot/node/12702">http://marine.gov.scot/node/12702</a>
Serpulid aggregations	<a href="http://marine.gov.scot/node/14691">http://marine.gov.scot/node/14691</a>
Other reef features in the following SACs: <ul style="list-style-type: none"> <li>• Firth of Lorn</li> <li>• Loch Creran</li> <li>• Loch Laxford</li> <li>• Loch nam Madadh</li> <li>• Lochs Duich, Long and Alsh Reefs</li> <li>• Sunart</li> <li>• Sound of Barra</li> </ul>	<a href="https://marinescotland.atkinsgeospatial.com/nmpi/default.aspx?layers=1885">https://marinescotland.atkinsgeospatial.com/nmpi/default.aspx?layers=1885</a>

The distance-measuring tool in NMPi should be used to measure the approximate distances from farms to sensitive seabed features.

Where there are sensitive features within the screening distance, further assessment should be carried out to consider the extent of the AZE/mixing zones using best available knowledge on site characteristics. The proximity distances specified in Table 2 should be used as a guide to the level of further consideration required.

Native oyster beds are also sensitive to the deposition of organic solids from finfish farms. To avoid the risk of potential illegal harvesting, the precise locations of native oyster beds are not shown on NMPi.

SNH and SEPA have undertaken an assessment of the proximity of farms to native oyster beds using confidential data on the locations of native oyster beds that SNH holds. This has identified one marine finfish farm where a native oyster bed is close to the edge of the farms' AZE. We have liaised directly with the operator of the farm concerned.

SNH is happy to discuss any aspect of the application of this Annex with operators. Please make contact via SEPA.

## Annex 2

### List of relevant Special Areas of Conservation for Atlantic salmon or freshwater pearl mussel

Table 4: List of SACs & SSSIs for salmon or freshwater pearl mussels

Foinaven	<a href="https://sac.jncc.gov.uk/site/UK0013141">https://sac.jncc.gov.uk/site/UK0013141</a>
Inverpolly	<a href="https://sac.jncc.gov.uk/site/UK0030171">https://sac.jncc.gov.uk/site/UK0030171</a>
Ardvar and Loch a'Mhuilinn Woodlands	<a href="https://sac.jncc.gov.uk/site/UK0030231">https://sac.jncc.gov.uk/site/UK0030231</a>
Abhainn Clais an Eas and Allt a' Mhuilinn	<a href="https://sac.jncc.gov.uk/site/UK0030081">https://sac.jncc.gov.uk/site/UK0030081</a>
Little Gruinard River	<a href="https://sac.jncc.gov.uk/site/UK0030183">https://sac.jncc.gov.uk/site/UK0030183</a>
River Kerry	<a href="https://sac.jncc.gov.uk/site/UK0012996">https://sac.jncc.gov.uk/site/UK0012996</a>
Glen Beasdale	<a href="https://sac.jncc.gov.uk/site/UK0030154">https://sac.jncc.gov.uk/site/UK0030154</a>
River Moidart	<a href="https://sac.jncc.gov.uk/site/UK0012994">https://sac.jncc.gov.uk/site/UK0012994</a>
Ardnamurchan Burns	<a href="https://sac.jncc.gov.uk/site/UK0030079">https://sac.jncc.gov.uk/site/UK0030079</a>
Mingarry Burn	<a href="https://sac.jncc.gov.uk/site/UK0030206">https://sac.jncc.gov.uk/site/UK0030206</a>
North Harris	<a href="https://sac.jncc.gov.uk/site/UK0012935">https://sac.jncc.gov.uk/site/UK0012935</a>
Langavat	<a href="https://sac.jncc.gov.uk/site/UK0030255">https://sac.jncc.gov.uk/site/UK0030255</a>
Endrick Water	<a href="https://sac.jncc.gov.uk/site/UK0019840">https://sac.jncc.gov.uk/site/UK0019840</a>
River Laxford/Loch Stack SSSI	<a href="https://sitelink.nature.scot/site/1055">https://sitelink.nature.scot/site/1055</a>

## Annex 3

# Technical Working Group Interim Advice: sea lice and wild salmonid interaction potential

7 April 2020

### 1. Interaction of potential of sea lochs

1.1 The Technical Working Group<sup>2</sup> is in the process of categorising the potential for interaction between sea lice and wild salmonid smolts of different areas of sea. The work is not yet complete. However, the Technical Working Group has produced an early, provisional assessment of the interaction potential of a number of sea lochs using available data from the Scottish Sea Lochs catalogue<sup>3</sup>.

1.2 **This provisional assessment has not been subject to detailed examination and consultation and may be subject to revision and change. At this time, it should be used solely for the purposes of the environmental risk assessments referred to in this guidance document.**

1.3 Sea lochs for which categorised if they:

- a) are listed in the Scottish Sea Lochs catalogue;
- b) receive drainage from a salmon river or, for Shetland<sup>4</sup> only, a trout river;
- c) have a coastal length to surface area ratio  $> 0.75 \text{ km/km}^2$  (i.e. they are narrow and hence a bottleneck for smolt migration).

1.4 The sea lochs were categorised using the criteria summarised in the Table 5.

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<sup>2</sup> The Technical Working Group is made up of Scottish Government, including Marine Scotland, SEPA, SNH and COSLA.

<sup>3</sup> Edwards, A & Edwards, F (1986), Scottish Sea Lochs: A catalogue.

<sup>4</sup> Note: The Sea Lochs catalogue does not include all Scottish sea lochs. For example, there are no sea lochs for Orkney listed in the catalogue. Some fairly large sea lochs, such as Loch Roag, are also not included.

**Table 5: Criteria used to categorise the interaction potential of sea lochs**

High interaction potential zones	Medium interaction potential zones	Low interaction potential zones
<ul style="list-style-type: none"> <li>• Long residence time;</li> <li>• Medium residence time but with residual flow direction is into the loch</li> </ul>	<ul style="list-style-type: none"> <li>• Medium residence time, except where residual flow direction is inwards</li> </ul>	<ul style="list-style-type: none"> <li>• Short residence time sea lochs</li> </ul>

**Key**

‘Residence time’ means the time in days taken for 60% of water in the sea loch to be exchanged. Residence times have been derived from the Scottish sea loch catalogue.

Residence time categories<sup>5</sup> are defined as follows:

(a) **long** residence time means residence times of 7 or more days;

(b) **medium** residence time means residence times of > 4 to < 7 days;

(c) **short** residence time means residence time of =< 4 days.

**Residual flow direction** means the average net direction of flow of surface layers in April, taking account of the effects wind, tides and river flows.

1.5 The results for the subset of sea lochs for which the required data were available are set out in the tables below:

High interaction potential (excluding Shetland)	
Little Loch Broom	Loch Hourn
Loch Duich	Loch Linnhe North
Loch Etive	Loch Long (South)
Loch Fyne - Upper Basin	Loch Nevis
Loch Gairloch	Loch Sunart
Loch Goil	Loch Torridon

<sup>5</sup> Note: The residence time categories have been selected to reflect sea lice biology. At 10 °C, free swimming salmon lice become infective after about 4 days. At 7 °C, this takes about 7 days.

<b>Medium interaction potential (excluding Shetland)</b>	
Loch Ailort	Loch Laxford
Loch Aline	Loch Long (Alsh)
Loch Broom	Loch Moidart
Loch Cairnbawn	Loch na Keal
Loch Carron	Loch na Lathaich
Loch Creran	Loch Portree
Loch Ewe	Loch Riddon
Loch Feochan	Loch Scridain
Loch Glendhu	Loch Slapin
Loch Inchard	Loch Sligachan
Loch Indaal	Loch Snizort Beag
Loch Inver	Loch Tarbert (Jura)

<b>Low interaction potential (excluding Shetland)</b>	
Holy Loch	Loch Spelve
Loch Leven	

<b>High interaction potential (Shetland)</b>	
Aith Voe	Ronas Voe
Burra Firth	Sullom Voe
Dales Voe (North Mainland)	Swining Voe
Gruting Voe	Vidlin Voe
Olna Firth	Weisdale Voe

<b>Medium interaction potential (Shetland)</b>	
Basta Voe	Mid Yell Voe
Colla Firth	Ura Firth
Lax Firth	Stromness Voe & Loch of Strom

<b>Low interaction potential (Shetland)</b>	
Balta Sound	Whale Firth

## Annex 4

### Freshwater loch: risk assessment guidance

**Table 6: Freshwater lochs at greatest risk from increased inputs of the plant nutrient, phosphorus**

Loch identification number used by SEPA	Loch name
100585	Loch Awe
100133	Loch Carabhat
100251	Loch Earn
100190	Loch Garry
100099	Loch Langabhat (South Harris)
100194	Loch Lochy
100048	Loch Merkland
100070	Loch nan Ritheanan
100156	Loch Ness
100208	Loch Shiel
100121	North Loch Scadabagh
100127	South Loch Scadabagh