Appendix 1

From: [redacted]
To:
Cc:
Subject: Official sensitive letter
Date: 17 February 2022 15:04:00
Attachments: Official sensitive SSC f.pdf

Dear [redacted]

As discussed the letter about your site in Braesclate, Isle of Lewis.

Kind regards

[redacted]

Senior Veterinary Inspector

APHA Field Delivery Services

Animal and Plant Health Agency

Inverness Field Services Longman House
28 Longman Road Inverness
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Animal & Plant Health Agency

17/02/2022

[redacted]
The Scottish Salmon Company, John Murray Building,
Scottish Marine Institute, Oban
Scotland, PA37 1QA

Dear [redacted]

The Animal Health and Welfare (Scotland) Act 2006

I visited the premises at Braesclate on December the 9th 2021. The visit was carried out due to a referral received by APHA from Marine Scotland with regards to mass mortality of ballan wrasse.

As discussed, some areas for the improvement and refinement of your current Standard Operating Procedures (hereafter SOPs) were noted as regards wrasse. You and a [redacted] were very keen to rectify this and proactively planned a comprehensive series of refinements to your existing SOPs including focus of inspection of wrasse, the refinement of training of staff caring for wrasse refinement of record keeping (mortality) of wrasse, and also refined ways to separate wrasse from salmon when wrasse need not to undergo treatments intended for salmon. In future, it is expected that the above measures will be cascaded and implement all Company sites if not done already. I will visit this site again once re-stocked wrasse and expect to see evidence of the above points to have been implemented the time of my visit.

This letter is without prejudice to any further enforcement or other action, which maybe taken at a later date.
If you have any questions or if anything is unclear please do not hesitate to contact

Yours sincerely,

[redacted]

Senior Veterinary Inspector

Cc Local Authority CNE-SIAR

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: Official sensitive West Strome
Date: 20 January 2022 16:03:00
Attachments: Official sensitive SSC signed.pdf

Dear [redacted]

Thank you again for your time earlier on this week.

As promised I am attaching the letter with the outcome of APHA's investigation. A copy of the letter will also be posted in due course.

It would be appreciated if- as discussed- the recommendation was implemented at all sites.

Best wishes

[redacted]

SVI [redacted]

Animal & Plant Health Agency

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18/01/2022

[redacted]
The Scottish Salmon Company,
John Murray Building,
Scottish Marine Institute,
Oban
Scotland,
PA37 1QA

Dear [redacted]

The Animal Health and Welfare (Scotland) Act 2006

I visited the premises at West Strome on September the 16th 2021. The visit was carried out due to welfare allegations received by APHA.
As discussed, I confirm that the actions taken by the Company to deal with increased mortality were satisfactory.
I would like to recommend that you keep a written record of the additional staff and resources you had employed to deal with the increased number of compromised fish. In future, this kind of record should be kept at all Company sites in similar circumstances.

This letter is without prejudice to any further enforcement or other action, which may be taken at a later date.
If you have any questions or if anything is unclear please do not hesitate to contact me.

Yours sincerely,
[redacted] Senior Veterinary Inspector
[redacted]

From: [redacted]
To:
Subject: Update - Taranaish site
Date: 11 January 2022 17:05:15

Hi [redacted]

[redacted]

I am writing with a short update on the Taranaish site, ahead of our catch up call towards the end of the month.

In week 52 we went back into Taranaish with a 12 hour Freshwater treatment. Mortality has reduced since them, although not to background levels yet, see below (week 2 is current week, so only partially complete). Fish health has improved, although sea lice remain persistent, so we are planning a further treatment, but are currently hampered by the weather. We plan to go in again with a 12 hour FW treatment, and possibly follow this with a chemotheraputant to achieve higher clearance.

	Mort Count	Mort %
2021/46	75,434	14.32
2021/47	129,650	28.73
2021/48	75,303	23.42
2021/49	66,000	26.87
2021/50	22,884	12.99
2021/51	8,125	5.31
2021/52	7,168	4.95
2022/01	1,928	1.4
2022/02	1,024	0.75

We have taken on board your comments with regards to the cleanerfish on site and have discussed several actions that we will take forward over the next few months to try and improve.

- We are reviewing our SOP's for husbandry & also training in order to better reflect current best practice, and give managers and site staff more direction in observing and recording cleanerfish on a daily/weekly basis.
- We have done some work in the past with regards to black loss, and plan to revisit this to try and give a more realistic accounting picture over the course of the cycle (i.e. modelling expected morts vs what is recovered)
- We plan to include a section in the VHWP specifically for recording cleanerfish mortality/behaviour/feeding/damage and will start the process of training that out to managers
- The Biology team will increase the health monitoring of cleanerfish, including pre and post treatment to measure efficacy of treatment, so that cost vs benefit can be documented in the co-habiting species
- During our bi-weekly treatment planning calls, we will discuss the treatment risk to the cleanerfish, and treatment will not commence without assessing the risk to them as well
    - We will collect more data on treatment effect on the CF (pre/post treatment swabs, mortality analysis, etc)
- We will continue to explore viable options for recovery of wrasse (creeling, netting a cage edge etc)

- As explained on the phone, our new wellboats arriving in the summer will come with the capability to remove wrasse and discharge direct to cage or into a retention tub for their own treatment.
    - We are exploring making adaptions to our current wellboat to recover CF, but there are no easy solutions to retrofit this
    - If we cannot dewater wrasse we have some options:
        - Limit treatments to 1 hour
        - Put salmon and wrasse over the grader to remove (not ideal if fish health is compromised)
        - Drop crowd towards end of loading – majority of wrasse stay in the final crowd, so would remove the risk for these

We are in the processing of pulling this together, however it will take some time to implement. We can discuss further when we catch up later in the month – if possible can you give me a date and time for the catch up call.

Warm Regards

[redacted]

[redacted]

Tel: [redacted]

www.scottishsalmon.com
shop.scottishsalmon.com

From: [redacted]
To:
Subject: Taranaish
Date: 10 December 2021 15:13:49
Attachments: Taranaish Opening wrasse & mortality.xlsx

Dear [redacted]

Below is further information with regards to your investigation visit into Taranaish site loss of wrasse.

Taranaish was stocked with wrasse over a number of weeks, starting in week 24 through to week 40 – see **Taranaish opening wrasse & mortality excel sheet.**

We treated the Taranaish site with freshwater in weeks 35, 42 & 45.

Wrasse are capable of tolerating short FW exposures, and will also be affected by gill disease issues, therefore the week 35 treatment was limited to 1 hour to ensure survival of the wrasse and also provide them with some gill health improvement. Our experience with this exposure to FW has had good results with wrasse to date and low mortality. As with any handling event, fish of any species that have experienced a challenge and encounter stress may die during the crowding or treatment event – this is seen in both the salmon and wrasse populations, and therefore we take a balanced view on the necessity of the intervention and whether the likely outcome will on balance improve welfare.

In weeks 42 (8 cages) and 45 (6 cages) a 3 hour exposure was considered for the fish, due to the significant escalation in AGD in the salmon population, combined with an environmental insult (suspect hydrozoan or plankton bloom) that was seen across the country in Q3 2021 causing anaemia and severe gill health challenges. Wrasse will have also been exposed to this challenge and suffered gill insult, which is likely to have resulted in mortality. Prior to this treatment event commencing, additional recovery methods were employed to remove the wrasse population from the cages to be treated, including:

- External fishermen employed to attend the site and use creels to fish out
- Site staff and cleanerfish supervisor on site checking creels and recovering fish where applicable
- During crowding, site staff and cleanerfish supervisor netting out wrasse

Very few wrasse were recovered from these additional measures, indicating fewer fish remaining in cages versus expected. During the same period, salmon mortality had escalated, which requires a different mortality removal method (brailing into tubs), making recovery of wrasse carcasses almost impossible. It is likely that during this time, wrasse mortality has also been elevated, but recovery missed and therefore a higher % of 'black loss' has been encountered. The mortality numbers in week 43 and 45 appear to be a stock adjustment rather than be a true reflection of actual recovered mortality. At a treatment event, where the fish are crowded, it is an opportunity to visually assess the population. Alongside daily observations at cage side and on feed cameras, this information is used to remove the wrasse from the FishTalk database. In week 45 wrasse mortality has hit 100% in all cages, despite only 6 cages being treated, which would suggest that the site observations of wrasse have decreased to insignificant levels, and as such the populations have been removed from the database as mortality.

Post treatment we did observe a slowing down of mortality and an increase in appetite among the salmon, however this was very short lived. The persistence and extremely fast resurgence of AGD was disappointing. The benefit of the FW treatment was not as long lasting as expected, due to water temperatures/low rainfall observed during this period – amoeba are extremely resilient and appear to have reinfected very quickly post treatment in these optimal conditions.

All treatments conducted are administered under veterinary care. At SSC we have an internal registered veterinary practice [redacted] Trained biologists attend the farms every 2-4 weeks, taking diagnostic and routine samples to help us make treatment decisions. We have a weekly discussion about each farm, with the company vet in attendance, where results and actions are discussed, and then a twice weekly treatment discussion involving marine production area and site managers and biology to discuss treatment actions. The company vet attended the site in weeks 44 & 47.

Going forward at the Taranaish site:

- Further FW treatment conducted in week 48
- Functional diet being delivered from end week 49 (increase vitamins and zinc to encourage healing/recovery)
- Repeated biomarker and gill swab sampling fortnightly to measure recovery
- Follow up FW treatment planned for early 2022
- Mechanical treatment as required to reduce lice.
- If above measures are not successful at promoting recovery, harvest may be considered.

It is fair to say that the hydrozoan bloom event experienced on this site along with the complication of resurgent AGD has been an extraordinarily severe challenge. Despite the best efforts of the production/biology/veterinary input and the amount of resource deployed, the mortality in both species has been significant.

If you need any further information, please get in touch.

Regards

[redacted]

[redacted]
Tel: +44 (0)131 718 8500
[redacted]
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shop.scottishsalmon.com

From: [redacted]
To:
Subject: RE: OFFICIAL SENSITIVE RE: Taranaish
Date: 22 December 2021 10:37:25
Attachments: ~WRD0001.jpg

Hi [redacted]

Just wanted to touch base and make sure you received the latest email with Taranaish information and if you have any feedback/require anything further from us?

Thanks

[redacted]

Unit 1, Smithy Lane
Lochgilphead, PA31 8TA
Tel: [redacted]
www.scottishsalmon.com
shop.scottishsalmon.com

From: [redacted]@apha.gov.uk>
Sent: 13 December 2021 15:46
To: [redacted]@scottishsalmon.com>
Subject: OFFICIAL SENSITIVE RE: Taranaish

Dear [redacted]

Thank you for your reply

I would be grateful if you could break out some of the information given for species (salmon and ballan wrasse) and weeks of treatment (as you noted treatments were on week 35, 42 and 45). Some other questions too.

-
-

Week 35

-

- **Salmon** treated for AGD with fresh water
  How long for?
  Measurable improvement?

- **Ballan wrasse**: were they treated for AGD as well with fresh water?
  How long for?
  Did you diagnose AGD in ballan wrasse as well as in salmon ? If yes, when?
  Rationale for treating wrasse?
  How many wrasse alive at this stage?

You advised that you tried to segregate the ballan wrasse so that they would not go under fresh water treatment
If you tried to segregate them please specify:
When did you start segregating them
How many did you segregate prior to fresh water treatment?
Were the below actions implemented specifically at week 35 (please comment on each point)

1. External fishermen employed to attend the site and use creels to fish out
2. Site staff and cleanerfish supervisor on site checking creels and recovering fish where applicable
3. During crowding, site staff and cleanerfish supervisor netting out wrasse

Week 42

- **Salmon** treated for AGD with fresh water
  How long for?
  Measurable improvement?

- **Ballan wrasse**: were they treated for AGD as well with fresh water?
  How long for?
  Did you diagnose AGD in ballan wrasse as well as in salmon at this stage? If yes, when?
  Rationale for treating wrasse with fresh water?
  How many wrasse alive at this stage?

You advised that you tried to segregate the ballan wrasse so that they would not go under fresh treatment?
please specify:
When did you start segregating them in relation to treatment
How many did you segregate prior to fresh water treatment?

Also were the below actions implemented at week 42 specifically (please comment on each point)?

1. External fishermen employed to attend the site and use creels to fish out
2. Site staff and cleanerfish supervisor on site checking creels and recovering fish where applicable
3. During crowding, site staff and cleanerfish supervisor netting out wrasse

Week 45

- **Salmon** treated for AGD with fresh water
  How long for?
  Measurable improvement?

- **Ballan wrasse**: were they treated for AGD as well with fresh water?
  How long for?
  Did you diagnose AGD in ballan wrasse as well as in salmon at this stage? If yes, when?
  Rationale for treating wrasse with fresh water?
  How many wrasse alive at this stage?

You advised that you tried to segregate the ballan wrasse so that they would not go under fresh water treatment?
please specify:
When did you start segregating them in relation to treatment itself
How many did you segregate prior to fresh water treatment?
Also were the below actions implemented **specifically** at week 45 (please comment on each point)

1. External fishermen employed to attend the site and use creels to fish out
2. Site staff and cleanerfish supervisor on site checking creels and recovering fish where applicable
3. During crowding, site staff and cleanerfish supervisor netting out wrasse

What was the salmon mortality for week 48 and after that for week 49?

Kind regards

[redacted]

Senior Veterinary Inspector

Scotland Field Delivery
Longman House
28 Longman Road
IV1 1SF
Inverness

-

From: [redacted]@scottishsalmon.com>
Sent: 10 December 2021 15:13
To: [redacted]@apha.gov.uk>
Subject: Taranaish

Dear [redacted]

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10. Follow up FW treatment planned for early 2022
11. Mechanical treatment as required to reduce lice.
12. If above measures are not successful at promoting recovery, harvest may be considered.

It is fair to say that the hydrozoan bloom event experienced on this site along with the complication of resurgent AGD has been an extraordinarily severe challenge. Despite the best efforts of the production/biology/veterinary input and the amount of resource deployed, the mortality in both species has been significant.

If you need any further information, please get in touch.

Regards

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