



Police Scotland Wildlife Crime Unit: Contactus@scotland.pnn.police.uk
Animal & Plant Health Agency: APHA.Scotland@apha.gsi.gov.uk
Scottish Government Fish Health Inspectorate: ms.fishhealth@gov.scot

13 June 2019

Dear Sir/Madam,

Addendum:

Unnecessary Suffering at The Scottish Salmon Company's farm at Aird Ardheslaig in Loch Shieldaig (Loch Torridon)

As promised in my letter of 11 June here's video footage shot at [The Scottish Salmon Company's salmon farm at Aird Ardheslaig in Loch Shieldaig \(NG78945605\)](#) on Saturday 8 June.



High resolution photos are now [available online via Google Drive](#).

My Drive > Loch Shildaig filming 8 June 2019 ▾

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Photo #1 a



Photo #1.jpg



Photo #2.jpg



Photo #3.jpg



Photo #4.jpg



Photo #5.jpg



Photo #6.jpg



Photo #7.jpg



Photo #8.jpg



Photo #9.jpg



Photo #10.jpg



Photo #11.jpg



Photo #12.jpg



Photo #13.jpg



Photo #14.jpg



Photo #15.jpg



Photo #16.jpg

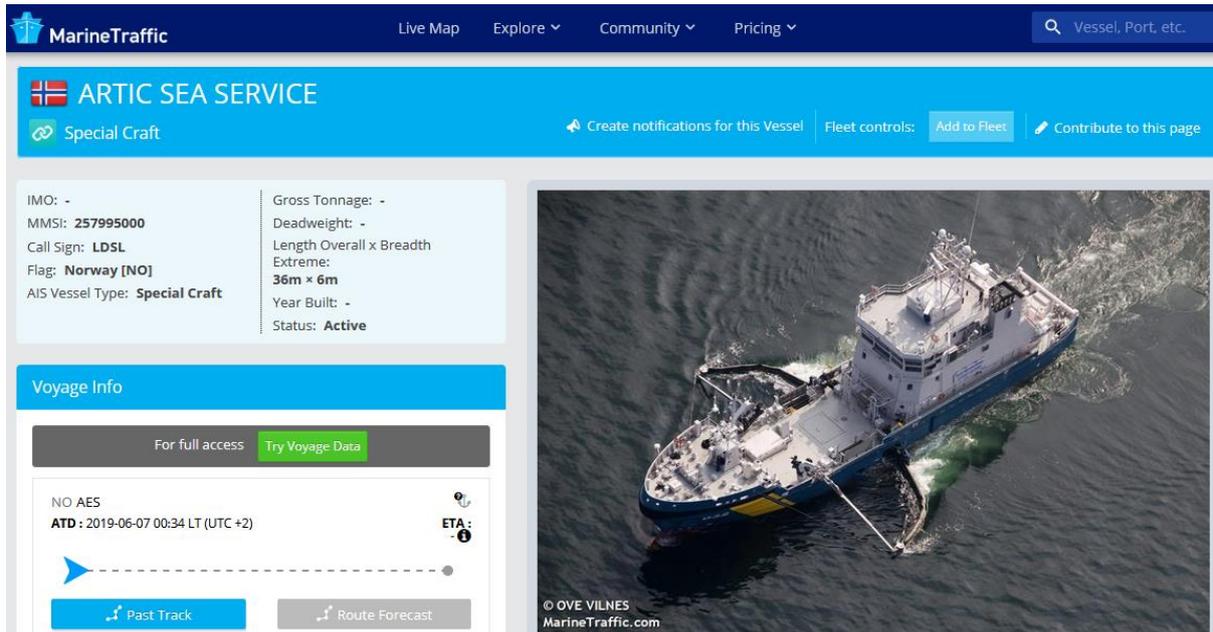


Photo #17.jpg



Video 8 June 2019.mp4

On Monday evening (10 June) it appears a boat called the [Artic Sea Service](#) arrived at the site.



The screenshot shows the MarineTraffic website interface for the vessel 'ARTIC SEA SERVICE'. The vessel is identified as a 'Special Craft' from Norway. Key details include: IMO: -, MMSI: 257995000, Call Sign: LDSL, Flag: Norway [NO], AIS Vessel Type: Special Craft, Gross Tonnage: -, Deadweight: -, Length Overall x Breadth Extreme: 36m x 6m, Year Built: -, and Status: Active. The 'Voyage Info' section shows 'NO AES' and 'ATD: 2019-06-07 00:34 LT (UTC +2)'. A satellite image of the vessel is shown on the right, with a copyright notice for OVE VILNES and MarineTraffic.com.

According to [Salmon Business in May 2019](#) the boat's "upgraded flushing system provides very good fish welfare and efficient removal of salmon lice".

Artic Group use chemical-free delousing system on service vessel

News by editorial staff - 2 May 2019

Shipping company upgrades its service vessel "Artic Sea Service".

The boat from shipping company Artic Group is already equipped with a delousing system from FLS (Flatsetsund Engineering) and is currently installing a newly developed system, where all pump water is sucked back and treated on board. This suction ensures that all lice are collected in the filter, even those who fall off on the way out of the system.

The work is being done at Averøy, Norway, in close collaboration with FLS. The boat is expected to be operational again in three weeks.

Gentle

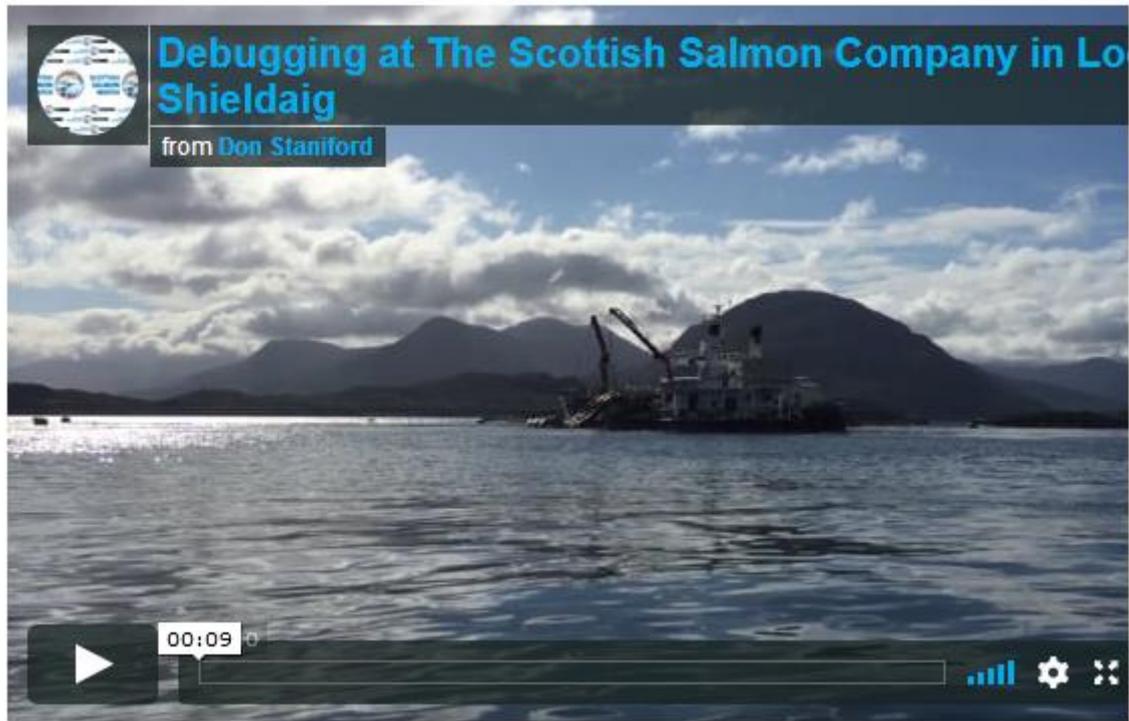
Artic has been handling fish with non-drug methods (IMM) since 2015, first on a fixed TC contract in Norway and now on a fixed TC contract in Scotland.

The company has developed a high level of expertise on delousing with the use of FLS's debugging system. The FLS system is a sustainable, efficient and gentle debugging method, with documented good results on the fish.

Artic Group CEO Rune Førde said he had great faith in delousing with only the use of seawater that is not affected by either chemicals or temperature.

"We also believe that FLS's upgraded flushing system provides very good fish welfare and efficient removal of salmon lice. With new lice collector and lice filter, this plant is now complete," said Førde.

Here's [video footage](#) shot yesterday (12 June):

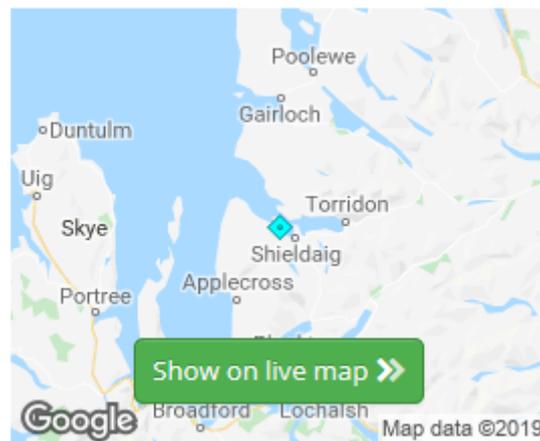


And here's photos taken in Loch Shieldaig yesterday (12 June):





Last night (12 June), two more boats (the [Volt Processor](#) and the [Naomi Jennifer](#)) arrived on the site.



The [Volt Processor](#) is a "boat designed specifically to accommodate delousing machinery" and is "equipped with two Optilice 4 XL delousers".

MarineTraffic Live Map Explore Community Pricing Vessel, Port, etc.

VOLT PROCESSOR

Utility Vessel Create notifications for this Vessel Fleet controls: Add to Fleet Suggest updated values

IMO: 9826940	Gross Tonnage: 494
MMSI: 257039730	Deadweight: 460 t
Call Sign: LFAD	Length Overall x Breadth Extreme: 43m x 12m
Flag: Norway [NO]	Year Built: 2018
AIS Vessel Type: Cargo	Status: Active

Voyage Info

For full access [Try Voyage Data](#)

GB ULL LOCH TORRIDON
 ATD: 2019-06-11 23:57 LT (UTC +1) ETA: 2019-06-12 06:00 LT (UTC)

[Past Track](#) [Route Forecast](#)



© RIA MAAT
MarineTraffic.com

"The boat is built around the Opticlcers. The delouser has a newly developed pump system that safeguards fish welfare in the best possible manner, and has a new filter for zero discharge of lice and to avoid reinfection of sea lice at the locality. We also have great space on deck so we minimise pipe bends," said skipper Øystein Henriksen in an interview with [Fish Farming Expert in February 2018](#).

fishfarmingexpert Search Calendar Salmon-Jobs Login M

Community Fish Health Lice Politics & Government Production Archive Opinion

Home > Lice > Volt prepares for charge against lice

Volt prepares for charge against lice

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An illustration of the Volt Processor, which is being built with delousing operations in mind. Image: Volt Service

The Volt Processor may also be equipped with a 'vacuum cleaner' for lice. Fish Farming Expert [reported in April 2019](#):

fishfarmingexpert

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Community Fish Health Lice Politics & Government Production Archive Opinion

Home > News > Sea lice 'vacuum cleaner' going on sale in Scotland

Sea lice 'vacuum cleaner' going on sale in Scotland

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The image shows a grey boat named 'VOLT PROCESSOR' with 'FOSNAVÅG' written on its side. A large, black, cylindrical vacuum cleaner is mounted on the deck, with a white plastic bag attached to its bottom. Two people in yellow safety gear are visible on the boat, one of whom is holding a green rope. The boat is on a body of water with a forested hillside in the background.

The [Naomi Jennifer](#) appears to be a work boat with capacity for chemical treatment.

MarineTraffic

Live Map Explore Community Pricing

Vessel, Port, etc.

🇬🇧 NAOMI JENNIFER

Local Vessel

Create notifications for this Vessel Fleet controls: Add to Fleet Contribute to this page

IMO: -	Gross Tonnage: -
MMSI: 235109092	Deadweight: -
Call Sign: ZIEH6	Length Overall x Breadth Extreme: 25m x 7m
Flag: United Kingdom [GB]	Year Built: -
AIS Vessel Type: Local Vessel	Status: Active

Voyage Info

For full access Try Voyage Data

GB UIG FISHFARMS

ATD: 2019-06-11 19:17 LT (UTC +1) ETA: 0

Past Track Route Forecast



The image shows a blue and white work boat named 'NAOMI JENNIFER' sailing on a body of water. The boat has a white cabin and a blue hull. It is moving towards the right of the frame, leaving a white wake. The background shows a rocky shoreline with some greenery.



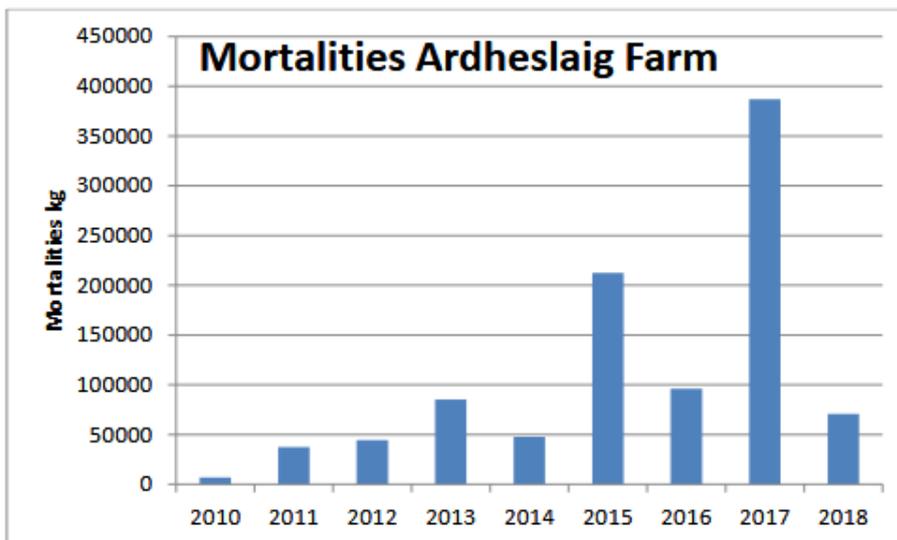
In spite of increasing disease and welfare problems, The Scottish Salmon Company is controversially seeking to expand production at [Aird Ardheslaig in Loch Shieldaig \(NG78945605\)](#). Highland Council has [received objections](#) from National Trust for Scotland, Keltic Seafare, Shieldaig Community Council and Torridon Sailing Tours:

<input type="checkbox"/>	09 May 2019	OBJECTION COMMENT	Dr Richard Luxmoore	📄
<input type="checkbox"/>	08 May 2019	CORRESPONDENCE	Salmon & Trout Conservation Scotland	📄
<input type="checkbox"/>	30 Apr 2019	OBJECTION COMMENT	Keltic Seafare	📄
<input type="checkbox"/>	30 Apr 2019	OBJECTION COMMENT	Dr Robin Drysdale	📄
<input type="checkbox"/>	30 Apr 2019	OBJECTION COMMENT	Shieldaig Community Council	📄
<input type="checkbox"/>	30 Apr 2019	OBJECTION COMMENT	Torridon Sailing Tours	📄
<input type="checkbox"/>	30 Apr 2019	OBJECTION COMMENT	Heather Drysdale	📄
<input type="checkbox"/>	30 Apr 2019	OBJECTION COMMENT	Gordon Drysdale	📄
<input type="checkbox"/>	30 Apr 2019	Consultee Comment	MARINE SCOTLAND	📄
<input type="checkbox"/>	29 Apr 2019	OBJECTION COMMENT	Shieldaig Community Council	📄
<input type="checkbox"/>	25 Apr 2019	Consultee Comment	TRANSPORT SCOTLAND	📄
<input type="checkbox"/>	23 Apr 2019	OBJECTION COMMENT	Celtman! c/o Paul McGreal	📄

Dr Richard Luxmore (Senior Nature Conservation Adviser for National Trust for Scotland) [wrote in objection in May 2019](#):

The farm has been operating at this site for over 20 years. The application will result in an increase in biomass of approximately 43% and an extension to the immediate footprint of the cages. The farm already has an extremely bad environmental record¹ and the increase in biomass will inevitably make this worse. It has failed 5 out of the most recent 10 benthic environmental monitoring reports with a sixth recorded as “borderline”. Mortalities have been very high, reaching nearly 400 tonnes in 2017. Mortalities were lower in 2018, but this represents the lower part of the two-year production cycle and can be expected to rise in 2019.

¹ Data from Scotland’s Aquaculture www.aquaculture.scotland.gov.uk



The high level of mortalities indicates a failure to manage disease effectively and is of great concern in the context of the proposal to increase biomass. In common with most animal husbandry, disease management is more difficult at higher stocking levels and an increase in farm size will exacerbate this problem.

Monitoring of chemical pollutants in the sediment around the existing farm has shown that the neurotoxin Emamectin Benzoate exceeded the level now considered by SEPA to be safe² by a very wide margin in May 2017. The chemical has recently been shown to be damaging to wild crustaceans over wide areas³, including Nephrops, which is the basis of an economically important fishing industry in Loch Torridon.

The farm has also experienced heavy losses in the form of escapes, amounting to 50,000 fish in one year. Escaped salmon pose a risk to wild salmon populations as they can enter rivers and interbreed with wild fish. Farmed salmon are of different genetic origin (mostly Norwegian) to local salmon in the West Highlands which have been shown to be genetically adapted to local conditions. The resulting interbreeding results in genetic introgression, producing fish that are less able to survive in the wild.

The National Trust for Scotland is major riparian landowner on the Torridon River and other rivers in the vicinity (Amhainn Alligin, Amhainn Coire Mhic Nobuil) and is concerned about the loss of both salmon and sea trout from these rivers in recent years.

² SEPA Position Statement to support the implementation of the Water Environment (Controlled Activities) (Scotland) Regulations 2011.

³ Fish farm survey report evaluation of a new seabed monitoring approach to investigate the impacts of marine cage fish farms, SEPA 2018

Shieldaig Community Council [wrote in objection in April 2019](#):

ePlanning Centre
Highland Council Headquarters
Glenurquhart Road
Inverness IV3 5NX
Email: eplanning@highland.gov.uk

30th April 2019

Dear Planning Team

IV54 Loch Shieldaig Ardheslaig North Aird - PLANNING APPLICATION NUMBER: 19/01413/FUL PROPOSAL: Marine Fish Farm - Atlantic salmon: new site consisting of 4 x 100m circumference circular cages

Please see the attached document and its appendices which sets out our objections to the above planning application.

We are **strongly** objecting to the application because: (A) many aspects of the case advanced by Scottish Salmon Company in support of its application are either disingenuous or incorrect (as detailed in the attached document) and (B) no further expansion of fish farms should take place inside Loch Torridon until proper environmental controls are in place **and** enforced by the regulatory bodies.

We trust that proper weight will be attached to this Community's views, and we intend to share our views with local politicians and interested third parties to ensure that this is the case.

Yours faithfully


Shieldaig Community Council

Wester Ross Area Salmon Fishery Board's [comments in May 2019](#) included:

Our concerns focus on the impact to wild salmon and sea trout populations within the surrounding area. Our response is based upon current and historic information available describing sea lice infestation on wild fish, including published Marine Scotland Science ('MSS') data.

We disagree with the Environment Impact Assessment Report ('EIA') presented with the application that states, '*Overall, the effects on wild salmonids in Loch Torridon due to the Proposed Development is considered minor and in the context of the EIA Regulations, not significant*'. The Board considers that there will be significant adverse effects on wild fish populations as a result of the Proposed Development.

The WRASFB objects to this application for the following reasons:

1. Adverse Effects of Sea Lice / Loch Torridon is over capacity for farmed salmon

Figure 1a (right) shows the reported average adult female lice count for salmon farms in Loch Torridon for the second year of the 2016-2017 production cycle. Note that the reported average number of adult female lice exceeded the CoGP treatment threshold in 7 of the 9 months of 2017.

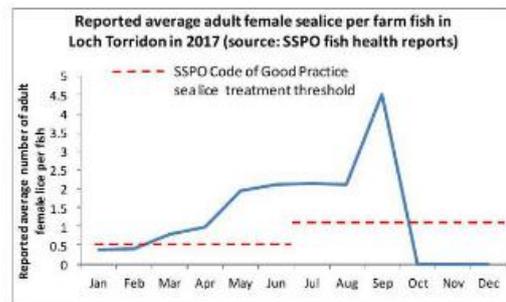
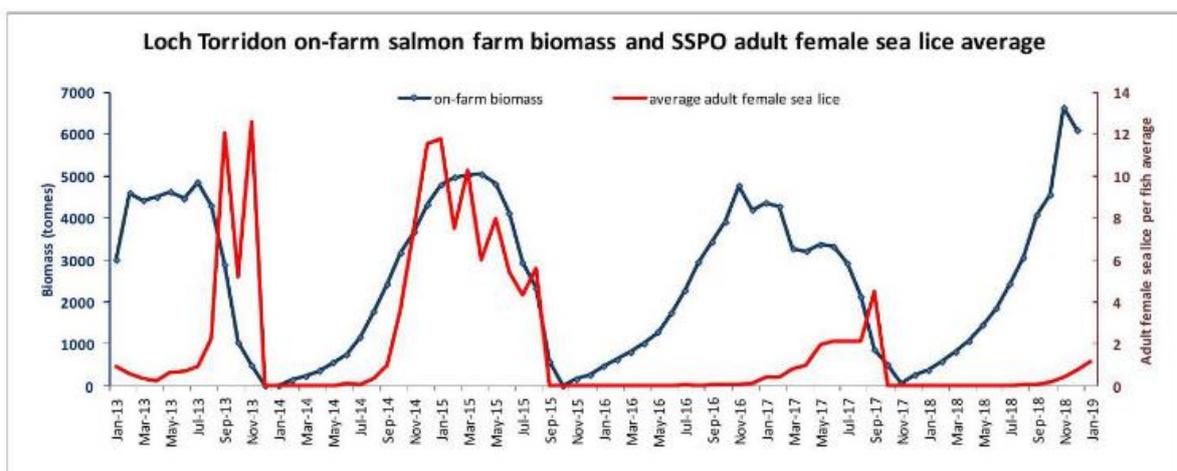


Figure 1b (below) shows that the average adult female lice count was rising faster in January 2019 than 2017; and that at the end of 2018 the actual on-farm salmon biomass (which relates to number of on-farm hosts for female sea lice) was much higher than at the end of 2016.



The latest sea lice and biomass figures indicate that the overall sea louse population in Loch Torridon in the early spring of 2019 was the highest for 4 years, since 2015. These figures are presented in Table 1.

	Salmon Farm					Farm salmon biomass	Adult female louse average
	Camus an Eilean	Kenmore	Aird	Sgeir Dughall	Camus an Laim		
consented	250	410	1735	2091	2500	5985	
Jan-14	0	0	0	0	0	0	F
Feb-14	0	0	55	20	58	134	0
Mar-14	0	0	65	78	79	222	0
Apr-14	0	0	106	119	131	356	0
May-14	0	0	172	190	192	554	0.01
Jun-14	0	0	227	275	238	741	0.08
Jul-14	0	0	379	433	349	1161	0.04
Aug-14	0	0	549	655	568	1772	0.32
Sep-14	0	0	713	832	875	2421	0.97
Oct-14	0	0	911	1043	1215	3169	3.66
Nov-14	0	0	955	1184	1533	3672	7.57
Dec-14	0	288	864	1273	1856	4321	11.55
Jan-15	0	311	989	1287	2207	4794	11.75
Feb-15	0	315	1057	1234	2360	4976	7.53
Mar-15	0	343	1124	1293	2257	5017	10.3
Apr-15	0	315	1127	1321	2282	5045	6.02
May-15	0	251	924	1471	2179	4815	7.96
Jun-15	0	244	824	1147	1903	4118	5.41
Jul-15	0	187	864	178	1703	2932	4.32
Aug-15	0	187	864	178	1067	2326	5.62
Sep-15	0	0	0	0	568	568	F
Oct-15	0	0	0	0	0	0	F
Nov-15	0	0	0	0	154	154	F
Dec-15	0	0	0	0	254	254	0
Jan-16	0	17	71	0	381	469	0
Feb-16	0	23	123	0	471	617	0
Mar-16	0	33	180	0	582	795	0
Apr-16	0	45	251	0	708	1004	0
May-16	0	70	348	0	863	1281	0.01

Table 1 Monthly biomass figures and average adult sea louse figures for salmon farms in Loch Torridon since 2015.

Figures are from Scotland's Aquaculture website

<http://aquaculture.scotland.gov.uk/map/map.aspx> an SSPO fish health and monthly sea lice reports. <http://scottishsalmon.co.uk/monthly-sea-lice-reports/>

Note that the sea average adult female sea lice count in February 2019 was the highest since 2015. With higher than ever biomass of farmed salmon in the Loch Torridon at the end of 2018 (2019 biomass figures not yet published) it seems probably that the overall springtime sea louse infection pressure in Loch Torridon area in spring of 2019 was at its highest since 2015.

Read the planning documents in full via Highland Council [online here](#)

The Highland Council

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Planning – Application Summary

19/01413/FUL | Marine Fish Farm - Atlantic salmon: new site consisting of 4 x 100m circumference circular cages | North Aird Ardhessaig Loch Shildaig

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Summary | [Further Information](#) | [Contacts](#) | [Important Dates](#)

Reference	19/01413/FUL
Alternative Reference	Not Available
Application Received	Mon 25 Mar 2019
Application Validated	Mon 25 Mar 2019
Address	North Aird Ardhessaig Loch Shildaig
Proposal	Marine Fish Farm - Atlantic salmon: new site consisting of 4 x 100m circumference circular cages
Status	Under Consideration

To reiterate, Scottish Salmon Watch ask you to investigate an issue of welfare abuse, unnecessary suffering and cruelty as a matter of urgency. We believe immediate action is required in order to end the shocking treatment of farmed salmon at [The Scottish Salmon Company's salmon farm at Aird Ardheslaig in Loch Shildaig \(NG78945605\)](#).

Yours sincerely,

Don Staniford

Director of Scottish Salmon Watch

