

FOI Backgrounder on Breaches of Biosecurity on Salmon Farms (March 2023)

From: **Don Staniford** <salmonfarmingkills@gmail.com>

Date: Mon, Jan 30, 2023 at 8:01 AM

Subject: FOI re. breaches of biosecurity in salmon farming since 1 September 2021

To: <CEU@gov.scot>

Please provide information relating to breaches of biosecurity in salmon farming since 1 September 2021 (please include salmon farms, hatcheries, processing plants, harvesting stations, well boats, trucks and other cases/incidents involving salmon farming and farmed salmon).

For example, a [Fish Health Inspectorate Visit Report dated 23 November 2021](#) (published online by the Scottish Government on 22 December 2022) detailed how biosecurity measures were "inadequately implemented" at The Scottish Salmon Company/Bakkafrost Scotland in Loch Carron in September 2021 with a separate letter issued "regarding this issue".

The Fish Health Inspectorate report ([Case 2021-0258](#)) detailed how biosecurity procedures had not been implemented citing how "large biomass mortality removal procedures allowed a breach of mortality containment". The report cited a "compromised trail".

Could you please therefore, as part of this FOI request, provide a copy of the letter referred to above?

Read more context via: [Bakkafrost's "Inadequately Implemented" Biosecurity in Loch Carron - dead salmon spewing infectious diseases & wastes into Marine Protected Area!](#)

Please also provide copies of any other letters relating to breaches of biosecurity in the salmon farming industry since 1 September 2021.

Please include emails, warning letters, legal information, enforcement, photos, video and any other information relating to breaches of biosecurity in the salmon farming industry since 1 September 2021.

Please consider this a formal request for information under the relevant FOI and Environmental Information regulations.

Please provide the information electronically.

Please provide a receipt.

Thanks,

Don Staniford

Director, Scamon Scotland

From: <casehandling.service@gov.scot>

Date: Tue, Feb 28, 2023 at 5:10 PM

Subject: Your recent correspondence with Scottish Government and partner agencies - 202300340514

To: salmonfarmingkills@gmail.com

Please find attached a response to your correspondence.

Due to the large number of documents I will separately email you an invitation to a shared Workspace in an online storage facility called “Objective Connect.” This online storage facility is now the Scottish Government preferred way to share large and/or numerous files. To access the documents via Objective Connect you will need to click on the link provided in my accompanying email. In order to access the shared Workspace files you will need to enter your email address and a password of your choice. You will then be able to enter the Workspace and click on each item to download the documents released.

One attachment • Scanned by Gmail ⓘ





Don Staniford
salmonfarmingkills@gmail.com

Our Reference: 202300340514

Your Reference: FOI re. breaches of biosecurity in salmon farming since 1 September 2021

28 February 2023

Dear Don Staniford,

REQUEST UNDER THE ENVIRONMENTAL INFORMATION (SCOTLAND) REGULATIONS 2004 (EIRs)

Thank you for your request dated 30 January 2023 under the Environmental Information (Scotland) Regulations 2004 (EIRs). Under regulation 5(2)(a) of the EIRs, our response to your request was due on 27 February 2023. Unfortunately it took longer than expected to deal with your request. I apologise for this delay, but please find the response below.

Your request

You asked for information relating to breaches in biosecurity in salmon farming since 01 September 2021. You also specifically requested a copy of a letter referenced in the published report for case 2021-0258.

As the information you have requested is 'environmental information' for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are applying the exemption at section 39(2) of the Freedom of Information (Scotland) Act 2002 (FOISA), so that we do not also have to deal with your request under FOISA.

This exemption is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot

St Andrew's House, Regent Road, Edinburgh EH1
3DG
www.gov.scot



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different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

Response to your request

I wrote to you to acknowledge your request on 07 February 2023 and stated that we were regarding the term "breach in biosecurity" to mean a significant lapse in a site's biosecurity measures plan i.e. unintentional discharges, spillages, animal escapes or where a site has not reported significant biosecurity events. You did not provide an alternative clarification so the above was used as the scope to gather the information for this request and providing information directly related to the event and the related procedures (i.e. investigation, reporting or handling) of the event. Therefore, I will be sending you a copy of most of the information you requested.

The information released is related to three breaches in biosecurity. These were an escape event at Grey Horse Chanel, an unintentional discharge at West Strome and an escape event at Colonsay. Both escape events involve the confirmed escape of fish. Escape events occurring within the time scale of this request but where escaped fish have not been confirmed have not been considered as part of our response as they do not constitute a breach in biosecurity.

Due to the large number of documents I will separately email you an invitation to a shared Workspace in an online storage facility called "Objective Connect." This online storage facility is now the Scottish Government preferred way to share large and/or numerous files. To access the documents via Objective Connect you will need to click on the link provided in my accompanying email. In order to access the shared Workspace files you will need to enter your email address and a password of your choice. You will then be able to enter the Workspace and click on each item to download the documents released.

Some additional information relevant to your request may be available from the following Scottish Government websites:

- Scotland's Aquaculture - <http://aquaculture.scotland.gov.uk/>
- Publication of case information- <https://www.gov.scot/collections/publication-of-fish-health-inspectorate-information/>

In particular, case information associated with the Fish Health Inspectorate's aquatic animal health surveillance programme may contain details on biosecurity breaches. This may include case information and details provided through the fish health reports. This information is subject to a proactive publication plan and is publicly available through the web link above.

Under regulation 6(1)(b) of the EIRs, we do not have to give you information which is already publicly available and easily accessible to you in another form or format. If, however, you do not have internet access to obtain this information from the website(s) listed, then please contact me again and I will send you a paper copy.

An exception under regulation 11(2) of the EIRs (personal information) applies to some of the information requested because it is personal data of a third party and disclosing it would contravene the data protection principles in Article 5(1) of the General Data Protection Regulation and in section 34(1) of the Data Protection Act 2018. This exception is not subject to the 'public interest test', so we are not

required to consider if the public interest in disclosing the information outweighs the public interest in applying the exception.

Some of the information supplied to you continues to be protected by the Copyright, Designs and Patents Act 1988. You are free to use it for your own purposes, including any non-commercial research you are doing and for the purposes of news reporting. Any other re-use, for example commercial publication, would require the permission of the copyright holder. Most documents supplied by the Scottish Government will have been produced by government officials and will be Crown Copyright. You can find details on the arrangements for re-using Crown Copyright material on the National Archives website at: <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>. Information you receive which is not subject to Crown Copyright continues to be protected by the copyright of the person, or organization, from which the information originated. You must ensure that you gain their permission before reproducing any third party (non Crown Copyright information).

Your right to request a review

If you are unhappy with this response to your EIRs request, you may ask us to carry out an internal review of the response, by writing to:

Annabel Turpie
The Director of Marine Scotland
Area 1B South, Victoria Quay
The Shore
Edinburgh
EH6 6QQ
Or by emailing directormarinescotland@gov.scot

Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at:
<http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>

Yours sincerely

Sarah Jane Parker
MSS : Aquaculture and Fish Health

From: **Objective Connect** <no-reply@objectiveconnect.com>
Date: Sat, Mar 4, 2023 at 10:00 AM
Subject: 202300340514 - Items for release under EIR - Objective Connect Invitation Reminder
To: <salmonfarmingkills@gmail.com>

Hello Don,

Your Workspace invitation is still pending.

Workspace

202300340514 - Items for release under EIR

Owned by Kate Webb

Thank you
Directorate for Marine Scotland

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This email was intended for salmonfarmingkills@gmail.com.
Please do not reply to this email.

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From: <Kate.Webb@gov.scot>
Date: Wed, Mar 8, 2023 at 10:25 AM
Subject: 202300340514 Final Response & Access to the items released under EIR
To: <salmonfarmingkills@gmail.com>
Cc: <Sarah-jane.Parker@gov.scot>

Dear Mr Staniford.

With regards to our response issued to you on 28 February 2023 (a copy of which is attached), I note that after a week you have not yet accepted your invitation to the Shared Workspace in Objective Connect to view and download the items released to you. I would like to advise you that this is a temporary portal only to release the information to you and will usually be deleted 20 working days from creation as the Scottish Government (SG) get charged for their usage. Our response to you will be published in due course on the SG website [here](#) and so you would still be able to access the documents after this time.

Please can you let me know if there is an issue with your access and we can resend the invite to you?

Thank you in advance.

Kind regards,

Kate Webb
MS FOI/EIR Adviser
Data, GIS & Quality Team

Corporate & Analytical Services
Marine Scotland - Scottish Government

Address: Marine Laboratory - 375 Victoria Road - Aberdeen - AB11 9DB
Email: kate.webb@gov.scot

Information downloaded on 13 March 2023:

Objective CONNECT DOCUMENTS/FOLDERS Search for documents & folders

HOME DIRECTORATE FOR MARINE SCOTLAND

DIRECTORATE FOR MARINE SCOTLAND

WORKSPACES FAVOURITES

202300340514 - Items for release under EIR
Owned by Kate Webb, created on 24 Feb 2023

Objective CONNECT 202300340514 - ITEMS ... Search for documents & folders

HOME 202300340514 - Items for release under EIR

LAST MODIFIED 24 Feb 2023, 3:46 PM KW Kate Webb

PARTICIPANTS (2)

DOCUMENTS

↓ (0) ↓

<input type="checkbox"/>	 APPROVAL - 202300340514 - C- Escape Report - 3A .pdf (581.1 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - GHC - Final notification - 1A .pdf (416.2 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - WS - Mortality Removal SOP - 2D .pdf (429.2 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - C - Initial Notification - 3B .pdf (433.9 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - GHC - Initial notification - 1B .pdf (432.2 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - WS - Fish Mortality Plan - 2A .pdf (295.4 KB) Version 1 - Created on 27 Feb 2023

Objective CONNECT 202300340514 - ITEMS ... Search for documents & folders

<input type="checkbox"/>	 APPROVAL - 202300340514 - West Strome - 2 .pdf (588.6 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - Colonsay - 3 .pdf (453 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - C - Final Notification - 3D .pdf (423.9 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - WS - Breach Resolution - 2C .pdf (223 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - WS warning letter - 2F .pdf (181 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - Grey Horse Channel - 1 .pdf (298.5 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - WS - Fish Mortality Plan (reviewed 09 03 22) - 2E .pdf (299.9 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - WS - Extracted text from VHWP - 2B .pdf (371.4 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - C - Fish Health Report - 3C .pdf (294.7 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - GHC - Escape report - 1D .pdf (537.1 KB) Version 1 - Created on 27 Feb 2023
<input type="checkbox"/>	 APPROVAL - 202300340514 - GHC - Net images - 1C .pdf (949.5 KB) Version 1 - Created on 27 Feb 2023

Information disclosed by the Scottish Government via FOI-2023-00340514 included (click on the # to download the source PDF):

[#1 – Mowi breaches of biosecurity at Colonsay:](#)

Breaches in Biosecurity – Colonsay

From: (REDACTED)

Sent: 03 February 2023 11:57

To: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>

Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>

Subject: RE: Open NC from Marine Scotland at Colonsay

Importance: High

Hi all,

I didn't receive any documentation from you last week. Could you please submit the requested documentation by 10th February?

Cheers,
(REDACTED)

(REDACTED)

Senior Fish Health Inspector
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

Mobile: (REDACTED)

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

marinescotland
science



From: (REDACTED)

Sent: 20 January 2023 13:05

To: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>

Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>

Subject: RE: Open NC from Marine Scotland at Colonsay

Thanks for the update (REDACTED), much appreciated.

I will keep an eye out for the documents being submitted next week sometime.

Have a great weekend when it comes.

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 20 January 2023 13:04
To: (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@mowi.com>

Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) (REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>
Subject: RE: Open NC from Marine Scotland at Colonsay

Hi (REDACTED)

I am responding just to say that (REDACTED) is off shift at present and will come back to you re your requests within the week.

What you request in document form should be straight forward.

Just to up date you on the trial weighting systems , we hope to lift these nets next week and a SOP and RA will be created from that and forwarded to you.

Have a great weekend.

(REDACTED)

(REDACTED)

(REDACTED)
Mowi SCOTLAND LTD

MOBILE: +(REDACTED)
DIRECT: +(REDACTED)
MAIL: (REDACTED)@mowi.com
WEB:

OFFICE: Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 20 January 2023 11:42

To: (REDACTED) <(REDACTED)@mowi.com>

Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>

Subject: RE: Open NC from Marine Scotland at Colonsay

Importance: High

Hi (REDACTED)

Following on from my below email, I'm not sure that you have fully understood what was required. You have conducted work to repair, service, replace or refurbish the equipment, however, the documented reviews were also to consider whether the procedures and equipment in place were adequate or if they required improvement. The decisions on whether to change procedures and equipment or not should have been documented by the reviews. The new equipment designs being trialled are fine but the documented reviews should have established the considerations for making the changes. Do you have evidence of these discussions and decisions to satisfy the requirement for documented review?

This could just be recorded in communications between yourselves and the manufacturers/service companies? Or perhaps, you haven't conducted a documented review and have only asked suppliers to improve the equipment spec?

Let me know,
(REDACTED)

(REDACTED)
Senior Fish Health Inspector
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)
S/B: +44 (0)131 244 2500
Mobile: (REDACTED)
e: (REDACTED)@gov.scot
w: <https://www.gov.scot/marine-and-fisheries/>

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From: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Sent: 20 January 2023 10:55
To: (REDACTED) <(REDACTED)@gov.scot>
Subject: RE: Trial for new weighting system at Colonsay

Hi (REDACTED)

I'm not sure that Mowi Scotland Ltd have fully understood what was required. They have conducted work to repair, service, replace or refurbish the equipment, however, the documented reviews were also to consider whether the procedures and equipment in place were adequate or if they required improvement. The decisions on whether to change procedures and equipment or not being documented by the reviews. The new equipment designs being trialled are fine but the documented reviews should have established the considerations for making the changes. Do they have evidence of these discussions and decisions to satisfy the requirement for documented review? Perhaps these are just recorded in communications between themselves and manufacturers/service companies? Or they haven't really conducted a documented review and have only asked suppliers to improve the equipment spec?

From: (REDACTED) <(REDACTED)@gov.scot>
Sent: 17 January 2023 13:37
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: Trial for new weighting system at Colonsay

HI (REDACTED)

Just to make you aware, MOWI are trialling some new gear out at Colonsay following the escape that occurred last year.

I have got back to (REDACTED) requesting the following:

- The Aqualine inspection log is dated 2015, do you have a revised risk assessment for the inspection of pens and moorings to support that this document is still suitable?
- Although you have submitted a trial design for improving the weighting mechanism, could you please also provide the SOP, risk assessment and contingency plan for raising and lowering the proposed new weighting systems to prevent escapes.

When do you expect to deploy the new CFR nets and the new weighting systems on the Colonsay site?

Have you got any further comments for this one?

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 16 December 2022 17:27
To: (REDACTED) <(REDACTED)@gov.scot>
Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>
Subject: FW: Open NC from Marine Scotland at Colonsay

Good evening (REDACTED)

I hope the following and attached will help answer your requests.

Due to the failure of weighting system connections, it is recommended that a documented review is undertaken to revise and improve the standard operating procedure and inspection plan for pen and mooring components, which is based on risk assessment, in accordance with A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) Chapter 4, point 4.16.

Aqualine Inspection log copy attached.

It is recommended that a documented review is undertaken of the design, quality and standard of manufacture of nets to take account of the conditions likely to be experienced on the site, including an adequate safety margin to prevent the failure of weighting system connections to meet the requirements of CoGP Chapter 4, point 4.20.

There are new nets on order with upgraded construction and materials these are trailed and developed with Knox nets Ltd, attached is an excerpt Knox did on the CFR high strength grade of HDPE knotted netting vs standard conventional Seal Pro style netting. We don't have a net certificate as yet as drawing will be re-worked prior to signing off.

It is recommended that a documented review is undertaken of the inspection procedures and frequencies for nets and the weighting systems as required by the CoGP Chapter 4, points 4.23 and 4.24, to ensure that weighting system connection failures are prevented.

Scale AQ manufacturer of Aqualine system pens have completed a inspection and repair and maintenance for Colonsay cages that covered replacement and re-wire of 20 froyer winch motors, 16 x tension bars replaced and renewed (completed this week). Tension bar long bolts and bushes have all now been removed and replaced at all bridle mooring points (12 per cage) Replacement of Froyer ring clamps bolts and chain connections are the next and final stage of the full refurbishment program.

It is recommended that a documented review should be undertaken of the procedure for raising and lowering weighting systems, the associated risk assessment and contingency plan, to ensure that procedures that could increase the risk of fish escaping from pens should be carefully planned and supervised to minimise any risk and that a documented risk assessment, a standard operating procedure and a contingency plan are in place in accordance with CoGP Chapter 4, points 4.29 and 4.30, .

There are currently 2 systems on a winter trial "Glider" with 16 x 80kg weights at each net seam and "Pipe Clamp" where the net is pulled down or released at the froyer ring to maintain/release tension. these cage trials are fitted with modified nets with the aim of allowing the nets to be raised and dropped with the froyer ring left in position without raising to mitigate risk of damage to nets during crowding operations. The trial cages are situated on North and South East corners of the site at the most exposed locations.

It is recommended that a documented review is undertaken of the predator risk assessment as required by the CoGP Chapter 4, point 4.26, to ensure that the requirement of the CoGP Chapter 4, point 5.8 are met by the equipment and farm design protecting the fish from predators.

HDPE knotted netting will be used as a upgrade to standard conventional Seal Pro style netting, as per attached netting materials documentation.

Best regards

(REDACTED)

(REDACTED)

MOWI Scotland LTD

MOBILE: (REDACTED)

MAIL: [\(REDACTED\)@mowi.com](mailto:(REDACTED)@mowi.com)

[\(REDACTED\)@mowi.com](mailto:(REDACTED)@mowi.com)

WEB: www.mowi.com

OFFICE: Hazel Cottage, Scalasaig, Isle of Colonsay, Argyll,
PA61 7YW, United Kingdom.

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final notification
29.09.2022.docx

From: (REDACTED)

Sent: 16 December 2022 11:04

To: (REDACTED) <(REDACTED)@mowi.com>

Cc: (REDACTED) <(REDACTED)@mowi.com>

Subject: RE: Colonsay Escape; Containment Recommendations - Documentation Reminder

Importance: High

Morning (REDACTED),

I haven't yet received anything from the business with regards to the recommendations that were made in the report that was issue to you on 12/10/22

regarding the circumstances that led to a significant increase of escape from your Colonsay site in June 22.

The deadline for submission is **2 weeks' time** (31st December). Please can you endeavour to submit the required evidence at your earliest convenience?

Kind regards,

(REDACTED)

From: (REDACTED)

Sent: 17 November 2022 12:50

To: (REDACTED) <(REDACTED)@mowi.com>

Subject: Colonsay Escape; Containment Recommendations - Documentation Reminder

Hi (REDACTED)

Just a reminder that the recommendations that were made in the attached report are due for submission by 31st December 22.

Cheers,

(REDACTED)

(REDACTED)

Senior Fish Health Inspector
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

Mobile: (REDACTED)

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

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Aqualine
Inspection Log blan

Background to incident (as reported)

The FHI was conducting a routine surveillance inspection at MOWI Scotland Ltds, Colonsay site (FS1296) on 16 June when a seal was observed by the inspector. Divers were called out to the site the same day and discovered a vertical tear in the base of the net. Following investigation the incident was attributed to a passive grading event which took place on 14 June when it is believed that the froyer ring connection had failed, adding strain to the already weakened net structure

causing it to tear. The hole was repaired by divers at the time of discovery. An Initial Notification of the circumstances which led to an increased risk of escape, was received by the Inspectorate on 16 June.

Summary

The incident was reported to have been a result of a froyer ring connection failure. Divers repaired the 1m hole in the net and the fish were moved into four other cages on the site and the net removed for repairs. All the froyer ring connection points (16 per cage) across the site are currently being replaced. Follow-up action includes a change to the procedure post net drop to immediately ensure that all net ties are in place and the net is sitting properly.

Holding lines:

- The Scottish Government is working to support fish farms towards the goal of 100% containment. In our response to the Salmon Interactions Working Group report last year, we committed to strengthening the escapes regulatory regime and to work towards introducing fines for fish farm escapes, with the ultimate goal of ring-fencing fees for wild salmonid conservation and research.
- In 2021 Scottish Government published a Code of Practice for containment to manage the interactions with marine mammals.
- We will publish a revised Technical Standard for Scottish Finfish Aquaculture to further improve containment of farmed fish.
- This latest escape event is disappointing. The Fish Health Inspectorate has attended site to conduct an investigation and will make recommendations in order to avoid similar events in future.

Kind regards
(REDACTED)

(REDACTED)

(REDACTED) | Marine Scotland Directorate
Scottish Government | Victoria Quay | Edinburgh EH6 6QQ
M: (REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>

Sent: 03 October 2022 15:08

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>

Subject: RE: Final Notification for Colonsay

Good afternoon (REDACTED)

Please accept my apologies for the delay, (REDACTED)

The Final Notification is now attached for Colonsay which contains what we discussed on the Teams meeting.

I hope this this is sufficient.

Kind regards

(REDACTED)

From: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Sent: 28 September 2022 12:29

To: (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Cc: (REDACTED) <(REDACTED)@gov.scot>

Subject: RE: Final Notification for Colonsay

Hi All,

I had a meeting today with Mowi Scotland Ltd regarding the final escape notification. They presented information regarding the discrepancies in fish numbers across the pens at the Colonsay site. These discrepancies have been due to fish health issues and problems in recording mortalities across the site.

My suggested resolution to use the official census figures, to establish the number of fish lost due to the containment breach, would have been an oversimplification and would have resulted in a significant over estimation of number of escaped fish. An additional complication is also encountered as the pen which suffered the breach in containment was subsequently split over a number of cages which would also have had discrepancies occurring due to the issues in recording mortalities.

Mowi Scotland Ltd will calculate the discrepancies across the cages which received fish from the pen suffering the breach in containment, minus the average discrepancy per pen due to mortalities at the site. This new estimation of number of fish which may have breached containment will be submitted as an update to the final notification.

I will update you further when this is received. If you have any queries please let me know.

Regards

(REDACTED)

From: (REDACTED)

Sent: 20 September 2022 16:53

To: (REDACTED) <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>

Cc: (REDACTED)<(REDACTED)@gov.scot>

Subject: FW: Final Notification for Colonsay

Hi All,

Please see the attached updated final notification and email correspondence below regarding the reported escape incident at Mowi Scotland Ltd's farm site Colonsay

(FS1296). I do not propose to record the number of escaped fish until we receive a more accurate figure.

The margins of error on fish transferred to the site for ongrowing and in recording mortalities that have been removed are causing Mowi Scotland Ltd difficulties in their calculations. However, I have proposed that the number of escaped fish should be the discrepancy from the official census records of live movements, harvests and mortalities.

I think recording and publishing such a large range in figures would result in criticism of the record keeping and husbandry operations, which rely on the stock census, at aquaculture sites. I will update you with any further information received.

Regards

(REDACTED)

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 20 September 2022 16:36

To: (REDACTED) <(REDACTED)@mowi.com>

Subject: RE: Final Notification for Colonsay

Hi (REDACTED)

Thank you for providing the updated final notification. We can appreciate that there have been operational issues which have made the calculation of the number of escaped fish problematic. However, the provision and publication of a very broad range for the number of escaped fish may present further issues in relation to the record keeping and husbandry operations of an aquaculture site and aquaculture production business (APB).

We think the final notification should reflect any discrepancy in fish numbers following consideration of the official records of movements and mortalities required to be maintained by the authorisation conditions placed on Mowi Scotland Ltd to operate as an APB.

Could we ask for the following information to be provided, as soon as possible, in relation to the 2021 Q2 production cycle at Colonsay?

- Details of the recorded number of Atlantic salmon which were transferred on to site for ongrowing in the 2021 Q2 production cycle;
- Details of the recorded number of Atlantic salmon from the 2021 Q2 production cycle which have been transferred off the site for ongrowing at other fish farm sites;

- Details of the recorded number of Atlantic salmon from the 2021 Q2 production cycle which were harvested from the site;
- Details of the recorded number of Atlantic salmon from the 2021 Q2 production cycle which were recorded as mortalities during the production cycle;
- Details of the recorded numbers of Atlantic salmon from the 2021 Q2 production cycle which did not complete the production cycle at the Colonsay site for any other reason than live transfer off the site, mortality on site or removal by harvest.

We will then use this information to record and publish a number of escaped fish for the reported incident. If there are any issues in the supply of this information please let me know.

Regards
(REDACTED)

(REDACTED)<(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>;
(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED) (MARLAB)
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<(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; MS Communications
<(REDACTED)@gov.scot>; Communications Net Zero & Rural Affairs <(REDACTED)@gov.scot>;
(REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED)
<(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>

Subject: Information to Note - Fish Farm Escape and Mortality Incidents - Holding Lines for Comms

Good Afternoon PO

Ministers and communication colleagues will wish to be aware of the following fish farm escape and mortality incidents.

Details of Escape

- Date of Incident: 2 June 2022
- Site Location: North Uist – Mowi
- Species: Atlantic Salmon
- Age in months: 14
- Weight: 2.9kg
- Reason for Escape: Hole in Net.

A final notification received 13 September 2022 confirmed that the total number of fish escaped was **32,463**.

Circumstances surrounding the Escape (as reported)

Whilst lowering a sinker ring post-harvest, it appears something has snagged underwater and subsequently caused a tear in netting approx. 8m long and 0.3m wide. Nothing untoward was noticed at the time of lowering and the damage was identified and repaired quickly. Weather conditions were good.

Follow-up Action

Removal of fish out of pens on site and nets with this design fault have been discarded. These nets are no longer in circulation by the company. A containment investigation was completed by the Fish Health Inspectorate. An audit report with recommendations will be provided to the site.

Potential Escape at Colonsay fish farm

Ministers will wish to be aware that we await the final notification from a potential escape incident at another Mowi fish farming site in Colonsay from June. We expect

the final notification next week and will provide an update to Ministers. Colonsay fish farm has reported 6 escape incidents and near misses since 2019, with 73,000 fish lost in 2020 in a storm event.

Annual Escapes Data (based on estimated and final notification reports published on Scotland's Aquaculture Website)

Year	Fish Escapes
2012	40, 957
2013	40, 754
2014	184,618
2015	18, 096
2016	11,496
2017	31,161
2018	53, 301
2019	70, 307
2020	206, 522
2021	19, 738
2022 (to date)	36, 381

Communications Activity

The details of the escape incident will be uploaded to Scotland's Aquaculture Website next week. We expect that there will be media activity at a future date. Past events of this scale have attracted significant media attention. Holding communication lines for the weekend are provided.

Holding Lines

- The Scottish Government is working to support fish farms towards the goal of 100% containment. In our response to the Salmon Interactions Working Group report last year, we committed to strengthening the escapes regulatory regime and to work towards introducing fines for fish farm escapes, with the ultimate goal of ring-fencing fees for wild salmonid conservation and research.
- In 2021 Scottish Government published a Code of Practice for containment to manage the interactions with marine mammals.
- Later this year, we will publish a revised Technical Standard for Scottish Finfish Aquaculture to further improve containment of farmed fish.
- This latest escape event is disappointing. The Fish Health Inspectorate has attended site to conduct an investigation and will make recommendations to the farm in order to avoid similar events in future.

Best regards

(REDACTED)

(REDACTED)

Tel: (REDACTED)

Mob: (REDACTED)

E-mail: [\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)

Web: [Aquaculture - gov.scot](http://Aquaculture.gov.scot) (www.gov.scot)

Mail: Victoria Quay, Leith, Edinburgh, EH6 6QQ



From: [\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>

Sent: 15 September 2022 13:18

To: (REDACTED) <[\(REDACTED\)@mowi.com](mailto:(REDACTED)@mowi.com)>

Subject: RE: Updated final Notifications

Hi (REDACTED),

Thank you for passing on the figure. I'll look forward to the update for Colonsay at the end of the week.

Regards

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 14 September 2022 12:45
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: FW: Updated final Notifications

Good morning (REDACTED)

Please accept my huge apologies for the delay in getting back to you.

I can now attach the final notification for Greanem indicating the number lost. For Colonsay I am chasing this information and hope to have it with you by the end of the week.

Kind regards

(REDACTED)

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 05 September 2022 17:02

To: (REDACTED) <(REDACTED)@mowi.com>

Subject: Updated final Notifications

Hi (REDACTED)

As both Colonsay (FS1296) and Grey Horse Channel Outer (FS1334) are now fallow could Mowi Scotland Ltd please submit updated Final Notifications for the attached incidents.

If there will be any continued delay to the provision of this information could Mowi Scotland Ltd please provide details of why the information is not currently available and an estimation of a date when this information will be provided?

Regards
(REDACTED)

(REDACTED)

Technical Manager - Fish Health Inspectorate

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375, Victoria Road | Aberdeen AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

Mob:(REDACTED)

FAX: +44 (0)131 244 0944

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

From: (REDACTED)<[\[REDACTED\]@mowi.com](mailto:(REDACTED)@mowi.com)>
Sent: 08 July 2022 12:54
To: MS FishHealth<MS.FishHealth@gov.scot>
Subject: Final Notification for Mowi's Colonsay site

Good afternoon

Please see attached the final notification which has been completed as best we can until such time as the harvest is completed in September.

Best regards

(REDACTED)
Mowi Scotland Ltd.

Mobile: (REDACTED)
DDI: (REDACTED)
Mail: [\[REDACTED\]@mowi.com](mailto:[REDACTED]@mowi.com)

Office: Mowi
Farms Office
Glen Nevis Business Park
Fort William

PH33 6RX

MOWI[®]

APPENDIX 1

FARMED FISH ESCAPES – INITIAL NOTIFICATION

This form is to be submitted immediately following **any circumstance** which caused or might have caused an escape of fish from a fish farm site.

Please refer to “WHAT TO DO IN THE EVENT OF AN ESCAPE OF FISH FROM A FISH FARM” for further guidance on how to complete this form: www.scotland.gov.uk/Topics/Fisheries/Fish-Shellfish

1. Please supply details of the authorised aquaculture production business (APB) and farm site (Read our [privacy notice](#) to find out what we do with your information.):

Site Name:	Colonsay	Site No:	FS1296
APB Name:	Mowi Scotland Limited	APB No:	FB0119
Contact Name:	(REDACTED)	Telephone No:	(REDACTED)
Fax No:		Email Address:	(REDACTED)@mowi.com

2. Please supply the following details regarding the fish escape:

Date & time of incident (nearest estimate)	16/06/2022	OS grid reference:	NR 43418 96701
Site location:	Rubha Garb Uragaig Isle of Colonsay	Estimated number of fish lost:	TBC
Species:	Atlantic Salmon	Average weight:	3.1kg
Age in months:	23 months	Growth stage:	Growers
Please supply details of any treatments administered for which the fish are in withdrawal:	None at present		
Please confirm whether the fish were healthy at the time of the escape, or the nature of any disease:	Yes all healthy		
Please confirm mortality rates on site and the reasons for mortality:	0.05% undiagnosed		

3. Please provide details of the circumstances surrounding the fish escape or potential escape (if necessary continue on a separate sheet):

Circumstances Surrounding the Escape or potential Escape Consider: Human error, predation, suspected foul play, failure or wear and tear of equipment (mooring, ropes, netting, cages or pens, boats), weather conditions (wave height, wind speed and tidal strength):		A seal was seen in pen 5 today whilst an inspection of the site was being carried out. Divers were on site and went into the pen and found a straight vertical tear approx. 1mtr at a depth of 12 mtrs at the bottom of the side wall where it meets the base.
Suspected Primary Reason for Escape or potential Escape		Hole which the froyer ring may have caused (suspected due to size)
Suspected Underlying Cause of Reason for Escape or potential Escape(if applicable)		It is thought when the last passive grade harvest happened the froyer ring has caught and ripped the net, which happened yesterday.
Completed by:	(REDACTED)	The form should be sent to: The Duty Inspector Tel: 0131 2443498 Fish Health Inspectorate Fax: 0131 244 0944 Marine Scotland Science PO Box 101 375 Victoria Road Aberdeen AB11 9DB Email: ms.fishhealth@gov.scot
Position in Organisation:	(REDACTED)	
Date:	16 th June 2022	

[#3 – Mowi Colonsay Escape – Final Notification \(29 September 2022\):](#)

APPENDIX 2

FARMED FISH ESCAPES – FINAL NOTIFICATION

This form is to be submitted **not later than 28 days** following the submission of the initial notification of circumstances which caused or might have caused the escape of fish from a fish farm site.

Please refer to “WHAT TO DO IN THE EVENT OF AN ESCAPE OF FISH FROM A FISH FARM” for further guidance on how to complete this form: www.scotland.gov.uk/Topics/Fisheries/Fish-Shellfish

1. Please supply details of the business and the site (Read our [privacy notice](#) to find out what we do with your information.):

Site Name:	Colonsay	Site No:	FS1296
APB Name:	Mowi Scotland Limited	APB No:	FB0119
Contact Name:	(REDACTED)	Telephone No:	(REDACTED)
FAX No:		Email Address:	(REDACTED)@mowi.com

2. Please provide final details of the escape or Potential escape:

Date of initial notification:	16/06/2022	Total number of fish lost (if none please specify “none”)*:	It has been very difficult to establish an exact number in relation to this incident, the site experienced two high mortality events precipitated by PD in the first instance and then AGD affecting weak fish, number control of dead fish was not easy as weather affected removal of fresh fish. C5 was split out over four cages, these four cages all suffered a count loss but were also mixed during harvest uplift with cages with a positive number completion but taking all this into consideration and the average loss from each cage we believe the realistic loss total from this incident to be 15-20k.
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Marine Scotland incident reference:	MSe160622SAL1	Number of fish recovered (if none please specify "none"):	None
Action taken by business to recover fish:	N/A	Have site movement records been updated:	Movement book was updated after each harvest until empty
Confirmed Primary Reason for Escape or potential Escape	Hole found on base of net.		
Confirmed Underlying Cause of Reason for Escape or potential Escape (if applicable)	Strategic ropes connecting the net to the froya ring parted leaving more strain on a single connection which caused the net to part which was then aggravated further by seals..		

3. Follow-up action:

What preventative measures have or will be taken to minimise the risk of a similar incident occurring on this or any of the business' other sites (continue on a separate sheet if necessary):	<i>We will set up our cages in the same way and carry out pre lift checks as per normal procedure but will change our procedure post net drop to immediately ensure that all net ties are in place and the net is sitting properly , we have purchased a ROV to allow us to do this if divers don't happen to be on site.</i>
--	---

Completed by:	(REDACTED)	The form should be sent to:	
		The Duty Inspector	Tel: 0131 2443498

Position in Organisation:	(REDACTED)	Fish Health Inspectorate	Fax: 0131 244 0944
Date:	29/09/22	Marine Scotland Science PO Box 101 375 Victoria Road Aberdeen AB11 9DB Email: ms.fishhealth@gov.scot	

* If the number of fish lost is unknown at this point please submit a further final notification form once the losses have been established.

#4 – [Mowi Colonsay Escape Report](#) (undated & unattributed but understood to be written by the Scottish Government's Fish Health Inspectorate):

Colonsay – The Site FS1296

Colonsay is an Atlantic salmon (*Salmo salar*) seawater site owned and operated by MOWI Scotland Ltd and is located off the north-east coast of Colonsay on the west coast of Scotland (NR434968) and falls within disease management area 16e - Colonsay. The site consists of fourteen polar circle cages, each measuring 120m in circumference. The site is authorised to stock Atlantic salmon, Lumpsummers (*Cyclopterus lumpus*) and Wrasse (of the genus *Labridae*).



Since the site was registered in 2015, there have been six reported escapes (or circumstances that may have given rise to a significant risk of escape) at Colonsay (see table below):

Date Reported	Species	Number of Fish Escaped	Reported Reason for escape
20/10/2017	Atlantic salmon	0	Other
18/10/2019	Atlantic salmon	0	Predator
08/11/2019	Atlantic salmon	0	Predator
17/01/2020	Atlantic salmon	73,684	Pen Failure
29/09/2021	Atlantic salmon	0	Hole in Net
16/06/2022	Atlantic salmon	15,000-20,000	Hole in Net

Background

The inspectorate was conducting a routine surveillance inspection at MOWI Scotland Ltds, Colonsay site (FS1296) on Thursday 16th June 2022 when a seal was observed by the inspector in cage 5. Divers were called out to the site the same day and discovered a vertical tear of approximately 1m in length at a depth of 12m, where the sidewall meets the base of the net.

Site staff attributed the damage to a seal in the first instance, however, following investigation the incident was attributed to a passive grading event which took place on 14th June 2022 when it is believed that the froyer ring connection had failed, adding strain to the already weakened net structure causing it to tear. The hole was repaired by divers at the time of discovery. In addition, the repair was also covered with the grade panel sweep net (15mm mesh) as a contingency in case the net repair failed due to the increased tension before the fish could be removed. Initial notification of the circumstances which led to an increased risk of escape, was received by the inspectorate on Thursday 16th June 2022.

The final notification was submitted on 8th July 2022 stating that between 15,000 and 20,000 fish are believed to have escaped during the incident.

FHI Investigation

The Inspectorate conducted a site visit on Thursday 16th June 2022.

Check sheets containing site integrity checks are used by staff members in order to detect any damage to equipment. These checks are generally conducted daily when the work boat performs mortality removal from the cages, but can be delayed due to bad weather for example. The check includes but is not limited to a visual inspection of the nets at surface level, visible ropes, pipes, winches, cables, ties, walkways and the tension pins/dyneema ropes. The last documented inspection was conducted on 12/06/2022, four days before the seal was noted in cage 5. Documented risk assessment and standard operating procedures are also in place and all staff had undertaken the company induction program, which contains site specific training on containment, and what to do in the event of an escape.

Prior to the passive grading event, an ROV also attended the site to inspect the net for any faults. None were found so the passive grade was completed on cage 5. Seal activity near the site is frequent so the nets are never lifted until they have been inspected.

Circumstances Leading to the Escape

The net located on the affected cage (5), was originally purchased on 30/08/2019 when it was deployed on another site operated and owned by MOWI Ltd before it was deployed at the Colonsay site (FS1296) in August 2021. Upon receipt of the net (ID:10531) at Colonsay, the net was dispatched to Morenot Aquaculture on 02/12/2020 for assessment and any necessary refurbishment work. The net was stress tested and one broken handle on the jumpnet was repaired and one lanyard was replaced at the waterline. The service card that was issued after the refurbishment works were completed, attests that the net met industry standards and that the attestation was valid until August 2022.

10 months later on 16/06/2022, the 1m hole that led to the escape of 15,000-20,000 fish, is suspected to have been caused as a result of a froyer ring connection failure during a passive grade which added additional tension on a small area of the net, causing it to tear. The hole was repaired on the same day the seal was observed in the cage and a patch of the grade panel sweep net (15mm mesh) was also secured over the repair as a contingency until the fish could be removed from the cage.

Company Response

In response to the circumstances that led to the breach in containment, the company transferred the fish from cage 5 into four other cages on the site. A vessel with ROV was commissioned to immediately check all the froyer rings and attachments. Additionally, the net was removed (22/06/22) from the water and was sent to the company's net station for analysis and repair.

Scale AQ have been contracted by the business to undertake a full maintenance program on the site and these works are ongoing at the time of writing. These works include:

- Replacement of tension bar bolts at wear points (Partially completed and ongoing)
- Completely renew/replace all froyer ring connection points (16 per cage)
- Replace as required lifting Intermediates.
- Replace all winch dynemma lifting ropes.

Summary

The circumstances that led to the significant increase in the risk of escape from MOWIs Colonsay site resulted in a loss of 15,000 – 20,000 fish. The incident was reported to have been a result of a froyer ring connection failure.

Divers repaired the 1m hole in the net of cage 5 on the same day the seal was observed in the cage. The fish were moved into four other cages on the site and the net removed for repairs. All the froyer ring connection points (16 per cage) across the site are currently being replaced. The winch dyneema lifting ropes and the tension bar bolts are also being replaced across the site.

FHI Recommendations

Following the breach in containment on 16/06/2022, recommendations have been made for improvement in relation to the selection and installation of pens and moorings, taking into consideration the environmental conditions that are experienced at the site, factoring in adequate safety margins to prevent any future failures in the weighting system. Recommendations for improvement were also made with regard to the standard operating procedure and inspection plan for pen and mooring components. The standard operating procedure for raising and lowering the weighting system should also be improved to ensure that these procedures are carefully planned and supervised to minimise any risk of escape. The site specific predator risk assessment should also be reviewed and improved to ensure that the equipment and farm design are sufficient in protecting the fish from predators.



Scottish Government
Riaghaltas na h-Alba
gov.scot

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS NO	FB0119	DATE OF VISIT	16/06/2022
SITE NO	FS1296	SITE NAME	Colonsay
CASE NO	20220201	INSPECTOR	(REDACTED)

Escape Investigation

During a routine surveillance inspection at the site, a seal was observed by the inspector in cage 5. Divers were called out to the site on the same day and discovered a vertical tear of approximately 1m in length at a depth of 12m, where the sidewall meets the base of the net. An initial escapes notification was received by Marine Scotland on the same day (MSe160622SAL1).

All epidemiological units were inspected.

On this occasion no samples were taken for disease analysis. The Inspector did not observe any clinical signs associated with the listed diseases as described in the Aquatic Animal Health (Scotland) Regulations 2009.

The information required for the public record of aquaculture production businesses regarding this site was verified and where necessary updated. The following records were also inspected to ensure that the conditions of authorisation for your Aquaculture Production Business (APB) are being met:

Aquaculture animal and aquaculture animal product movement records were inspected and appeared to be adequately maintained.

Mortality records were inspected and found to be adequately maintained.

Following the circumstances of the reported escape of Atlantic salmon on the 16/06/2022, the following recommendations are made for improvement at the site:

Due to the failure of weighting system connections, it is recommended that a documented review is undertaken to revise and improve the standard operating procedure and inspection plan for pen and mooring components, which is based on risk assessment, in accordance with A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) Chapter 4, point 4.16.

It is recommended that a documented review is undertaken of the design, quality and standard of manufacture of nets to take account of the conditions likely to be experienced on the site, including an adequate safety margin to prevent the failure of weighting system connections to meet the requirements of CoGP Chapter 4, point 4.20.

It is recommended that a documented review is undertaken of the inspection procedures and frequencies for nets and the weighting systems as required by the CoGP Chapter 4, points 4.23 and 4.24, to ensure that weighting system connection failures are prevented.

It is recommended that a documented review should be undertaken of the procedure for raising and lowering weighting systems, the associated risk assessment and contingency plan, to ensure that procedures that could increase the risk of fish escaping from pens should be carefully planned and supervised to minimise any risk and that a documented risk assessment, a standard operating procedure and a contingency plan are in place in accordance with CoGP Chapter 4, points 4.29 and 4.30, .

It is recommended that a documented review is undertaken of the predator risk assessment as required by the CoGP Chapter 4, point 4.26, to ensure that the requirement of the CoGP Chapter 4, point 5.8 are met by the equipment and farm design protecting the fish from predators.

Please ensure that these points have been addressed by 31st December 2022. Records or documentation demonstrating that these points have been addressed should be sent to the Fish Health Inspectorate (contact details below). The site may be subject to further inspection or enforcement action should the appropriate action regarding the above points not be taken within the time period stipulated.

Please contact myself or the duty inspector should you require any further information or have any queries regarding this report.

Signed: (REDACTED)
Fish Health Inspector

Date: 12/10/2022

[Note via: http://aquaculture.scotland.gov.uk/data/fish_escapes.aspx]

Search Results

NB this list does not include details of escapes from deregistered fish sites

Fish Escapes > Escape Start Date > From date: To date:
 Water Type: Local Authority:
 [Show All Results](#) [Clear All Filters](#) [CSV Export](#)

Show/Hide Advanced Filters

Escape Id	Escape Start Date	Escaped Species	Final Number of Fish Escaped	Site Id	Site Name	Operator	Actions
453	25/01/2023	Atlantic Salmon	0	FS1121	Bight of Bellister, Dury Voe	Scottish Sea Farms Ltd	More
452	02/01/2023	Atlantic Salmon	0	FS1344	Invertote Salmon Farm	Organic Sea Harvest Ltd	More
451	15/11/2022	Rainbow Trout	0	FS1112	Etive 4	Dawnfresh Farming Ltd	More
450	18/10/2022	Atlantic Salmon	0	FS1294	Wyre	Scottish Sea Farms Ltd	More
448	07/10/2022	Atlantic Salmon	0	FS1294	Wyre	Scottish Sea Farms Ltd	More
447	05/10/2022	Atlantic Salmon	0	FS1294	Wyre	Scottish Sea Farms Ltd	More
449	28/09/2022	Atlantic Salmon	0	FS0361	Sian Bay	Scottish Sea Farms Ltd	More
446	27/06/2022	Rainbow Trout	3,918	FS1310	Loch Pooltiel	Kames Fish Farming Ltd	More
445	22/06/2022	Rainbow Trout	0	FS0462	Kames Bay (east)	Kames Fish Farming Ltd	More
444	16/06/2022	Atlantic Salmon	15,000 - 20,000	FS1296	Colonsay	Mowi Scotland Ltd	More
443	02/06/2022	Atlantic Salmon	32,463	FS1334	Grey Horse Channel Outer	Mowi Scotland Ltd	More

Via: http://aquaculture.scotland.gov.uk/data/fish_escapes_record.aspx?escape_id=444

Fish Escapes

Fish Escape Details		
Escape Id	444	
Operator at Time of Escape	Mowi Scotland Ltd	
Escape Water Type	S	
Escape Start Date	16/06/2022	
Escape Start Time	00:00	
Escape End Date	16/06/2022	
Escape Grid Reference	NR434967	
Escaped Species	Atlantic Salmon	
Stage	Grower fish (salmon only)	
Age	23 months	
Average Weight	3.1kg	
	Initial Notification	Final Notification
Date	16/06/2022	08/07/2022
Number of Fish Escaped	Not Known	15,000 - 20,000
Number of Fish Recovered	N/A	
Escape Reason	Hole in Net - HOL	Hole in Net - HOL

Data supplied by Marine Scotland on 12/02/2023

Site Details	
Site ID	FS1296
Site Name	Colonsay
Address	Stob Ban House Glen Nevis Business Park PH33 6RX
Telephone Number	
Date Registered	09/04/2015
Operator	Mowi Scotland Ltd
Aquaculture Type	Fish
Water Type	Seawater
Species	Atlantic Salmon, Lump sucker, N/A, Wrasse
Health Surveillance Frequency	Low
Production reported to Marine Scotland within last 3 years?	Yes
National Grid Reference	NR434968
Easting	143400
Northing	696800
Marine Scotland Management Area	16e - Colonsay
Local Authority	Argyll and Bute
Region	Strathclyde
View on Map	View on map

Data supplied by Marine Scotland on 12/02/2023

[#6 – Mowi Greanem Escape – Initial Notification \(2 June 2022\):](#)

APPENDIX 1

FARMED FISH ESCAPES – INITIAL NOTIFICATION

This form is to be submitted immediately following **any circumstance** which caused or might have caused an escape of fish from a fish farm site.

Please refer to “WHAT TO DO IN THE EVENT OF AN ESCAPE OF FISH FROM A FISH FARM” for further guidance on how to complete this form: www.scotland.gov.uk/Topics/Fisheries/Fish-Shellfish

1. Please supply details of the authorised aquaculture production business (APB) and farm site (Read our [privacy notice](#) to find out what we do with your information.):

Site Name:	Greanem, Cheesebay	Site No:	FS1334
APB Name:	Mowi Scotland Ltd	APB No:	
Contact Name:	(REDACTED)	Telephone No:	(REDACTED)
Fax No:		Email Address:	(REDACTED)@mowi.com

2. Please supply the following details regarding the fish escape:

Date & time of incident (nearest estimate)	2/6/22, 0900hrs	OS grid reference:	
Site location:	North Uist	Estimated number of fish lost:	TBC
Species:	Salmon	Average weight:	2.9kg
Age in months:	14 months	Growth stage:	Grower/Harvest
Please supply details of any treatments administered for which the fish are in withdrawal:	None		
Please confirm whether the fish were healthy at the time of the escape, or the nature of any disease:	No issues other than PGD and complex gill pathology		
Please confirm mortality rates on site and the reasons for mortality:	4% for month of May. 70% gill related, 30% seal predation.		

3. Please provide details of the circumstances surrounding the fish escape or potential escape (if necessary continue on a separate sheet):

Circumstances Surrounding the Escape or potential Escape Consider: Human error, predation, suspected foul play, failure or wear and tear of equipment (mooring, ropes, netting, cages or pens, boats), weather conditions (wave height, wind speed and tidal strength):		Whilst lowering a sinker ring post-harvest, it appears something has snagged underwater and subsequently caused a tear in netting approx. 8m long and 0.3m wide. Nothing untoward was noticed at the time of lowering and the damage was identified this morning, and repaired quickly. Weather conditions have been good.
Suspected Primary Reason for Escape or potential Escape		Net failure
Suspected Underlying Cause of Reason for Escape or potential Escape(if applicable)		Underwater snag of netting on sinker ring
Completed by:	(REDACTED)	The form should be sent to:
Position in Organisation:	(REDACTED) Mowi Scotland Ltd	The Duty Inspector Fish Health Inspectorate Marine Scotland Science PO Box 101 375 Victoria Road Aberdeen AB11 9DB Email: ms.fishhealth@gov.scot
Date:	02/06/22	Tel: 0131 2443498 Fax: 0131 244 0944

[#7 – Mowi Greanem Escape – Final Notification \(13 September 2022\):](#)

APPENDIX 2

FARMED FISH ESCAPES – FINAL NOTIFICATION

This form is to be submitted **not later than 28 days** following the submission of the initial notification of circumstances which caused or might have caused the escape of fish from a fish farm site.

Please refer to “WHAT TO DO IN THE EVENT OF AN ESCAPE OF FISH FROM A FISH FARM” for further guidance on how to complete this form: www.scotland.gov.uk/Topics/Fisheries/Fish-Shellfish

1. Please supply details of the business and the site (Read our [privacy notice](#) to find out what we do with your information.):

Site Name:	Greanem	Site No:	FS1334
APB Name:	Mowi Scotland Ltd	APB No:	FB0119
Contact Name:	(REDACTED)	Telephone No:	(REDACTED)
FAX No:		Email Address:	(REDACTED)@mowi.com

2. Please provide final details of the escape or Potential escape:

Date of initial notification:	02/06/2022	Total number of fish lost (if none please specify “none”)*:	32 463
Marine Scotland incident reference:	MSE020622SAL1	Number of fish recovered (if none please specify “none”):	N/A
Action taken by business to recover fish:	None	Have site movement records been updated:	Movement book was update after each harvest until empty
Confirmed Primary Reason for Escape or potential Escape	Tear in net		
Confirmed Underlying Cause of Reason for Escape or potential Escape (if applicable)	Due to design, rubbing on a weight baring rope along with additional tension caused by partially lowered sinker tube caused rope to snap and weight transferred onto net causing tare.		

3. Follow-up action:

What preventative measures have or will be taken to minimise the risk of a similar incident occurring on this or any of the business' other sites (continue on a separate sheet if necessary):	Removal of fish out of pens on site and discarding of nets with this design fault. These nets are no longer in circulation in the company.
--	--

Completed by:	(REDACTED)	The form should be sent to:
Position in Organisation:	(REDACTED)	The Duty Inspector Tel: 0131 2443498 Fish Health Inspectorate Fax: 0131 244 0944 Marine Scotland Science PO Box 101 375 Victoria Road Aberdeen AB11 9DB Email: ms.fishhealth@gov.scot
Date:	13/09/2022	

* If the number of fish lost is unknown at this point please submit a further final notification form once the losses have been established.

[#8 – Mowi Greanem Breaches in Biosecurity:](#)

[Note that Greanem and Grey Horse Channel Outer are one of the same]

Breaches in Biosecurity - Grey Horse Channel

[should read Outer]

From: (REDACTED) (MARLAB)
Sent: 15 September 2022 16:16
To: (REDACTED) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>; (REDACTED) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>; (REDACTED) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>
Cc: (REDACTED) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>
Subject: RE: Farmed Fish Escape - Grey Horse Channel Outer: Notification to Ministers: 32,463 fish lost

Hi (REDACTED)

Please find attached the internal escape investigation report for the visit to the site on 26 June 2022. A report with recommendations for improvement is currently being drafted.

Regards
(REDACTED)



Grey Horse Channel
Outer Escape Repor

Sent: 15 September 2022 12:42

To: • Marine Scotland Communications <(REDACTED)@gov.scot>; MS Compliance <(REDACTED)@gov.scot>; Greener Communications <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>

Cc: (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>

Subject: Escape incident: MSe020622SAL1 - Grey Horse Channel Outer FS1334

Good afternoon,

Please find attached an updated final notification of escape for Grey Horse Channel Outer (Greanem) FS1334 accounting for the total number of fish lost. The escape incident was initially reported on 02/06/2022.

If you require any further information, please feel free to get in touch.

Kind regards,

(REDACTED)

Fish Health Inspector

Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Mobile: (REDACTED)

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>



Final Notification
Greanem 14.09.22.docx

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 14 September 2022 12:45
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: FW: Updated final Notifications

Good morning (REDACTED)

Please accept my huge apologies for the delay in getting back to you.

I can now attach the final notification for Greanem indicating the number lost. For Colonsay I am chasing this information and hope to have it with you by the end of the week.

Kind regards

(REDACTED)

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>
Sent: 05 September 2022 17:02
To: (REDACTED) <(REDACTED)@mowi.com>
Subject: Updated final Notifications

Hi (REDACTED)

As both Colonsay (FS1296) and Grey Horse Channel Outer (FS1334) are now follow could Mowi Scotland Ltd please submit updated Final Notifications for the attached incidents.

If there will be any continued delay to the provision of this information could Mowi Scotland Ltd please provide details of why the information is not currently available and an estimation of a date when this information will be provided?

Regards
(REDACTED)

(REDACTED)

Technical Manager - Fish Health Inspectorate

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375, Victoria Road | Aberdeen AB11 9DB

Tel: (REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 16 August 2022 17:22
To: (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@mowi.com>
Cc: (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: Re: Final Notification for Greanem

Hi (REDACTED) and (REDACTED),
I am going through the harvest reports and will get the final number/notification to you hopefully by end of play tomorrow - apologise for the delay.
Best wishes
(REDACTED)

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>
Sent: Tuesday, August 16, 2022 5:14:56 PM
To: (REDACTED) <(REDACTED)@mowi.com>
Cc: (REDACTED)@gov.scot <(REDACTED)@gov.scot>; (REDACTED)@gov.scot <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@mowi.com>
Subject: FW: Final Notification for Greanem

Hi (REDACTED),

We were under the impression that the remaining fish originating from the escapes pen at Grey Horse Channel Outer have been harvested on or around the 7th August. Can we request that an updated final notification with the final count is submitted as soon as possible please?

Kind Regards,

(REDACTED)
(REDACTED)
Senior Fish Health Inspector
Marine Scotland - Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB
Tel: (REDACTED)
S/B: +44 (0)131 244 2500
Mobile: (REDACTED)
e: (REDACTED)@gov.scot
w: <https://www.gov.scot/marine-and-fisheries>

From: (REDACTED)<(REDACTED)@gov.scot>

Sent: 16 August 2022 11:38

To: (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>;
(REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
(REDACTED)<(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>;
(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>;
(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)
(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)
<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB)
<(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB)
<(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB)
<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB)
<(REDACTED)@gov.scot>

Subject: Grey Horse Channel Outer Escape Report

Hi all,

Please find attached a copy of the Grey Horse Channel Outer escape report.

Regards,

(REDACTED)

Fish Health Inspector

Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Mobile: 07765699184

e: [\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)

w: <https://www.gov.scot/marine-and-fisheries/>



Grey Horse Channel
Outer Escape Repor

From: (REDACTED) <(REDACTED)@gov.scot>
Sent: 15 August 2022 11:44
To: (REDACTED) <(REDACTED)@mowi.com>
Cc: (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@mowi.com>;
(REDACTED) <(REDACTED)@mowi.com>
Subject: RE: Net at Pen 42

Hi (REDACTED),

Thank you for sending that over.

I was wondering if you have concluded harvesting of the Grey Horse Channel Outer Stock from Groatay? If so, would you be able to let us know if you have an estimate for escaped fish at Grey Horse Channel Outer.

Regards,

(REDACTED) Fish Health Inspector

Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Mobile: (REDACTED)

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

From: (REDACTED)<(REDACTED)@mowi.com>

Sent: 12 August 2022 11:55

To: (REDACTED)<(REDACTED)@gov.scot>

Cc: (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@mowi.com>;
(REDACTED)<(REDACTED)@mowi.com>

Subject: RE: Net at Pen 42

Hi (REDACTED),

Attached is document with diagram/photos of net damage.

Please let me know if you have any further questions

Cheers

(REDACTED) Best regards/ Vennlig hilsen

(REDACTED)

(REDACTED)

Mowi Scotland

Mobile: (REDACTED)

Mail: (REDACTED)@mowi.com



Net images.pdf

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 09 August 2022 10:42

To: (REDACTED)<(REDACTED)@mowi.com>

Cc: (REDACTED)@gov.scot

Subject: Net at Pen 42

Hi (REDACTED)

I was wondering if you had a picture or diagram you could send us detailing the design flaw in the nets that were in use during the time of the escape incident?

Thanks,

(REDACTED) Fish Health Inspector

Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Mobile: (REDACTED)

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

From: MS FishHealth <MS.FishHealth@gov.scot>

Sent: 29 June 2022 16:59

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>

Subject: FW: Final Notification for Greanem

Dear All,

Please see attached initial notification of suspected escape event at Grey Horse Channel
Outer ref: MSe020622SAL1.

Kind Regards,

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>

Sent: 29 June 2022 16:36

To: MS FishHealth <MS.FishHealth@gov.scot>

Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@mowi.com>

Subject: Final Notification for Greanem

Good afternoon all

Please see attached the final notification as required.

Kind regards

(REDACTED)



Initial Notification
Greanem 020622.do

From: (REDACTED)<(REDACTED)@gov.scot> <(REDACTED)@gov.scot>
Sent: 29 June 2022 15:03
To: (REDACTED)<(REDACTED)@mowi.com>
Cc: (REDACTED)<(REDACTED)@mowi.com>; (REDACTED)<(REDACTED)@mowi.com>;
(REDACTED)<(REDACTED)@mowi.com>
Subject: FW: Initial Notification Greanem 020622

Hi (REDACTED)

Thank you for the information on the transfer of fish to Groatay and on the harvest plans for the site. I will pass these on to colleagues who schedule our surveillance visits.

Could I ask if a count was made, on the pen which suffered the tear in the net on 02 June 2022, whilst the fish were being loaded into the wellboat for transfer? And if so, what was the number of fish transferred from that pen and any discrepancy found?

If no count was conducted, could you let me know why this was not undertaken? Also, a record of live fish movements is required to be maintained by condition 5 of the authorisation granted to Mowi Scotland Ltd to operate as an aquaculture production business. If no count was conducted what number of live fish were transferred to Groatay and how was this number determined following the potential escape incident on 02 June 2022?

Regards
(REDACTED)

From: (REDACTED)<(REDACTED)@mowi.com>
Sent: 29 June 2022 14:29
To: MS FishHealth <MS.FishHealth@gov.scot>
Cc: (REDACTED)<(REDACTED)@mowi.com>; (REDACTED)<(REDACTED)@mowi.com>;
(REDACTED)<(REDACTED)@mowi.com>
Subject: RE: Initial Notification Greanem 020622

Hi (REDACTED)

I just wanted to provide a further update on this as per requirements for notification.

We have now moved the remaining fish from Greanem (Outer Grey Horse Channel) to Groatay to secure the stock further. The pens will be harvested out by the 1st week in August going by the latest harvest plans, so when we have emptied the site we will revert back with final potential numbers.

We are still investigating, and hope to have further information soon.

Best regards

(REDACTED)
(REDACTED)

Mowi Scotland Limited

Mobile: (REDACTED)DDI: (REDACTED)
Mail: [\(REDACTED\)@mowi.com](mailto:(REDACTED)@mowi.com)

From: (REDACTED) (MARLAB)
Sent: 23 June 2022 09:00
To: (REDACTED) <(REDACTED)@mowi.com>
Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>
Subject: RE: Risk to Containment due to Pen Weighting Systems

Hi (REDACTED)

Thank you for the information on your ongoing investigations and the confirmation that the remaining stocks are safe. The FHI look forward to the information that becomes available from the investigations and an update on the mitigations in place to prevent abrasion and damage to nets from weighting systems.

I will also pass on your frustrations to colleagues regarding the publication of the new version of A Technical Standard for Scottish Finfish Aquaculture (STS), which required the updating and revision of some sections. I would note that the current version of the STS is still available for guidance and that, as far as I am aware, the requirements with regard to weighting systems on pen nets will remain the same when the revised STS is published.

The conclusions of the investigations in to Mowi Scotland Ltd's recently reported potential escape incidents could be very helpful in advising any future revisions of the STS and should perhaps be used to provide advice to be considered by the Improved Containment Working Group. This could ensure the STS guidance remains fit for purpose and help prevent any loss of containment for aquaculture animals, as farm pen sizes increase and farms are developed in areas with more challenging environmental conditions.

Regards

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 22 June 2022 19:50
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>
Subject: Re: Risk to Containment due to Pen Weighting Systems

Hi (REDACTED)

Thanks for the email. The issues recently seen are multi-factorial and at present very difficult to conclude on. We are carrying out thorough investigations at both farms as we speak to identify route cause before concluding. We are obviously taking this very seriously so we will feed back as soon as we have more credible information, our main priority is ensuring the remaining stock is safe which we have done so already.

For info, the industry are still awaiting the new STS release as all have already agreed the current one is not fit for purpose, so it needs to be prioritised and completed, we are eagerly awaiting. The drafts are all completed, and have been for some time, but it has all gone very quiet.

Regards

(REDACTED)

On 17 Jun 2022, at 14:34, (REDACTED)@gov.scot wrote:

Hi (REDACTED) and (REDACTED),

Thank you for reporting the two recent potential escape incidents at the Mowi Scotland Ltd fish farm sites Grey Horse Channel Outer (FS1334) and Colonsay (FS1296). The causes of net damage being linked to the operation of weighting systems is concerning. Has there been a change to equipment specification, procedures for equipment use or are the sites operating in environmental conditions which were not envisaged when the equipment was designed for the sites?

Although the guidance in A Technical Standard for Scottish Finfish Aquaculture (STS) is not yet being enforced, it is available for the Scottish aquaculture industry to follow. Section 7.1 of the STS requires weighting systems to be designed and installed so they do not cause significant net abrasion in the envisaged environmental conditions and during all operations. The systems should not have parts in which the net can become trapped underwater.

To help our understanding of these events and prevent damage to pen nets by weighting systems, what actions are being undertaken by Mowi Scotland Ltd to ensure that the equipment and procedures in place for their use, on the company's farm sites, will ensure that significant net abrasion, trapping and tearing will not continue to occur?

Regards

(REDACTED)

(REDACTED)

Technical Manager - Fish Health Inspectorate

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375, Victoria Road | Aberdeen AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

Mob:(REDACTED)

FAX: +44 (0)131 244 0944

e:.(REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

From: (REDACTED)
Sent: 08 June 2022 16:16
To: MS.FishHealth@gov.scot
Cc: (REDACTED)<(REDACTED)@mowi.com>
Subject: Re: Initial Notification Greanem 020622

Hi (REDACTED)

We don't have a number for the potential escape at the moment; we are working on harvest plans as we speak and the farm is due to be fallow in approx 6-8 weeks. Once we have harvested the population in question we will have an exact number for you. I will update further once I have exact dates for harvests.

Many thanks.

Regards
(REDACTED)

On 8 Jun 2022, at 08:53, MS.FishHealth@gov.scot wrote:

Hi (REDACTED)

Thank you for the information provided on this event last week. Could you please provide an update on the number of fish involved in the escape or provide an estimated timeframe of when this information will be available?

Regards
(REDACTED)

(REDACTED)
Technical Manager - Fish Health Inspectorate
Marine Scotland – Science
Scottish Government | Marine Laboratory | 375, Victoria Road | Aberdeen AB11 9DB
Tel: (REDACTED)
S/B: +44 (0)131 244 2500
Mob (REDACTED)
FAX: +44 (0)131 244 0944
e: [\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)
w: <https://www.gov.scot/marine-and-fisheries/>

From: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Sent: 07 June 2022 12:47
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>
Subject: RE: Possible 27.6.22 visit to WI week - Grey Horse Channel

Hi,

Sorry I'm late in replying. I would be happy for the visit to be organised for then. Especially as the logistics are difficult for organising the trip. I haven't any information on how significant the loss of fish has been but will keep you posted if I get that info.

The equipment, procedures and training for the operations that have resulted in the breach should be a focus and the mitigations in place for using that type of weighting system, which should not result in chaffing or damage to other equipment but regrettably has.

Cheers
(REDACTED)

From: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Sent: 02 June 2022 14:01
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: FW: Initial Notification of suspected escape at Grey Horse Channel Outer MSe020622SAL1

Hi (REDACTED)

Can you schedule an ESC and CNA for Grey Horse Channel Outer (FS1334) as soon as possible? We need to find out how this happened and whether the weighting system should be used at exposed sites.

Cheers
(REDACTED)

From: MS FishHealth <MS.FishHealth@gov.scot>
Sent: 02 June 2022 12:26
To: (REDACTED) (MARLAB) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>
Subject: RE: Initial Notification of suspected escape at Grey Horse Channel Outer MSe020622SAL1

I have spoken to (REDACTED) this morning – they are still seeing fish in the cage but observed the hole on a camera – they are not sure how many fish involved but are going to move it to another asap so will have an idea of numbers soon. Harvesting has already started on that cage also so should know soon. No attempts at recapture, they are not seeing fish outside the cage. They have reported to fisheries trusts.

I have saved the notification and tasked (REDACTED) with uploading to Aquadat – have told her to give you a shout if she needs a hand. (REDACTED)

Have a good weekend.

(REDACTED)

From: (REDACTED) (MARLAB) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>
Sent: 02 June 2022 12:21
To: MS FishHealth <MS.FishHealth@gov.scot>
Subject: RE: Initial Notification of suspected escape at Grey Horse Channel Outer MSe020622SAL1

Hi (REDACTED)

Thanks for the info. Can you contact Mowi and get an idea of how many fish might be involved? Also if any attempts at recapture are being conducted?

Cheers
(REDACTED)

Please see attached notification of suspected escape event at Grey Horse Channel Outer ref: MSe020622SAL1.

From: MS FishHealth <MS.FishHealth@gov.scot>

Sent: 02 June 2022 12:10

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>;
(REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
(REDACTED) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>;
(REDACTED) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>;
(REDACTED) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED)
(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
(REDACTED) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
(REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>;
(REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>;
(REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) (MARLAB) <(REDACTED)@gov.scot>;
(REDACTED) <(REDACTED)@gov.scot>

Cc: (REDACTED)(MARLAB) <(REDACTED)@gov.scot>

Subject: FW: Initial Notification of suspected escape at Grey Horse Channel Outer MSe020622SAL1

Please see attached notification of suspected escape event at Grey Horse Channel
Outer ref: MSe020622SAL1.

From: MS FishHealth

Sent: 02 June 2022 12:09

To: (REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; 'Greener Communications'

<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>;

(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>;

(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>; MS Communications

<(REDACTED)@gov.scot>; MS Compliance <(REDACTED)@gov.scot>;

(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>

Subject: Initial Notification of suspected escape at Grey Horse Channel Outer MSe020622SAL1

Dear all,

Please see attached initial notification of suspected escape event at Grey Horse Channel Outer ref: MSe020622SAL1.

The company plan to move remaining fish into another empty cage on site asap and will update with an estimate on numbers then.

(REDACTED)

(REDACTED)Fish Health Inspectorate
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: (REDACTED)

E: ms.fishhealth@gov.scot

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 02 June 2022 11:54
To: MS FishHealth <MS.FishHealth@gov.scot>; (REDACTED) <(REDACTED)@mowi.com>
Subject: RE: Initial Notification Greanem 020622

Hi (REDACTED)

Yes that is correct.

Kind regards

(REDACTED)

From: MS.FishHealth@gov.scot <MS.FishHealth@gov.scot>
Sent: 02 June 2022 11:47
To: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>
Subject: RE: Initial Notification Greanem 020622

Hi (REDACTED),

Can you confirm site name please – we have site FS1334 registered as Grey Horse Channel Outer – is that correct?

Thanks,

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 02 June 2022 11:42

To: MS FishHealth <MS.FishHealth@gov.scot>
Subject: Initial Notification Greanem 020622

Good morning

Please see attached an initial notification for a potential escape at our site in Greanam.

As you will see below, this has already been called in and the relevant fishery boards have been notified.

We will get the final notification to you within the time period.

Kind regards

(REDACTED)

From: (REDACTED) <(REDACTED)@mowi.com>
Sent: 02 June 2022 11:32
To: (REDACTED) <(REDACTED)@mowi.com>
Cc: (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>; (REDACTED) <(REDACTED)@mowi.com>
Subject: Initial Notification Greanem 020622

Hi (REDACTED),

Initial notification attached for potential escape at Greanem. MSincident number is MSE020622SAL1.

Please can you forward on to MS. I have already notified them verbally and I have also spoken to the local fishery trusts.

Best regards

(REDACTED)
(REDACTED)

Mowi Scotland Limited

Mobile: (REDACTED)
DDI: (REDACTED)
Mail: (REDACTED)@mowi.com

Office: Mowi
Farms Office
Glen Nevis Business Park
Fort William
PH33 6RX

[Note via: http://aquaculture.scotland.gov.uk/data/fish_escapes_record.aspx?escape_id=443]

Fish Escapes

Fish Escape Details		
Escape Id	443	
Operator at Time of Escape	Mowi Scotland Ltd	
Escape Water Type	S	
Escape Start Date	02/06/2022	
Escape Start Time	09:00	
Escape End Date		
Escape Grid Reference	No data available	
Escaped Species	Atlantic Salmon	
Stage	Grower fish (salmon only)	
Age	14 months	
Average Weight	2.9kg	
	Initial Notification	Final Notification
Date	02/06/2022	14/09/2022
Number of Fish Escaped	TBC	32,463
Number of Fish Recovered	N/A	
Escape Reason	Equipment damage - EQD	Equipment damage - EQD

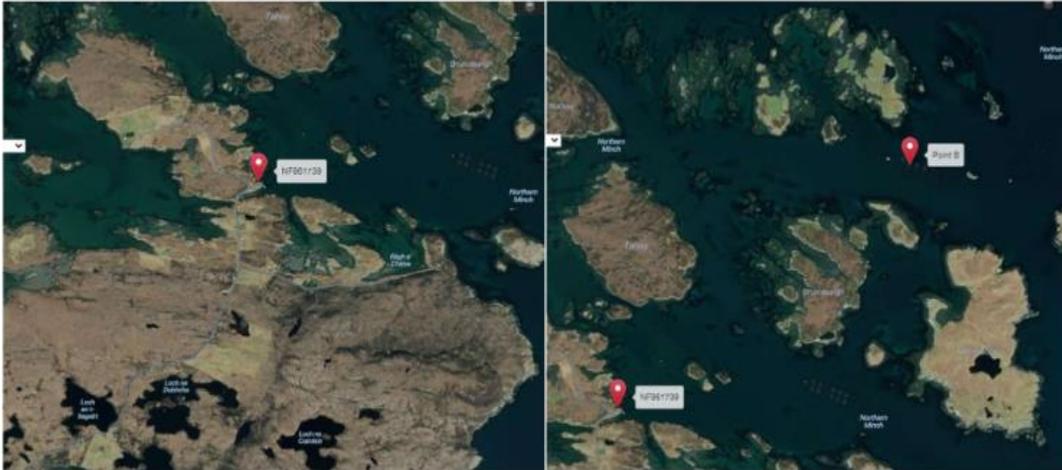
Data supplied by Marine Scotland on 12/02/2023

Site Details	
Site ID	FS1334
Site Name	Grey Horse Channel Outer
Address	Hoebeg Cheesebay Loch Maddy North Uist HS6 5AT
Telephone Number	
Date Registered	18/09/2019
Operator	Mowi Scotland Ltd
Aquaculture Type	Fish
Water Type	Seawater
Species	Atlantic Salmon, Lump sucker, N/A, Wrasse
Health Surveillance Frequency	Medium
Production reported to Marine Scotland within last 3 years?	Yes
National Grid Reference	NF993754
Easting	99300
Northing	875400
Marine Scotland Management Area	5c - E North Uist
Local Authority	Western Isles
Region	Western Isles
View on Map	View on map

Data supplied by Marine Scotland on 12/02/2023

#9 – [Mowi Greanem Escape Report](#) (undated & unattributed but understood to be written by the Scottish Government's Fish Health Inspectorate):

Grey Horse Channel Outer Escape Report



Grey Horse Channel Outer (FS1334) is an Atlantic salmon (*Salmo salar*) seawater site owned and operated by MOWI Scotland Ltd, located near Cheesebay Isle of North Uist (NF993754) and is situated within the disease management area 5c - E North Uist. The site consists of 12 circular floatation collar pens each measuring 120m in circumference. The site currently uses 18mm Aqualine AS Midgard nets. The site is authorized to stock Atlantic salmon (*Salmo salar*), Lumpcods (*Cyclopterus lumpus*) and Wrasse (of the genus *Labridae*).

The site was registered in 2019 and has reported an escape on the 2nd June 2022, escape incident number: MSe020622SAL1.

Background

The incident was first reported to the FHI on 02/06/2022 following the discovery and repair of a tear in the netting of approximately 8m in length and 0.3m wide. The tear occurred during harvest procedures at pen position 42 on the 1st June 2022, believed to have happened whilst lowering the sinker ring following completion of the harvest. The damage was first discovered by staff operating a net washer on the 2nd June 2022 and divers were immediately called in for repair that morning. Following the escape incident all fish from Grey Horse Channel Outer (GHCO) were moved to the nearby site Groatay (FS1083) to allow for an in-depth inspection of the facilities at GHCO to be conducted.

MOWI Scotland Ltd submitted their final notification of escape on 29/06/2022. The event has been classed as a multifactorial incident as the investigation of the incident by the company found that the design of the nets had a flaw regarding the position where the vertical rope meets the base lead line. Where these ropes join at the base of the net chaffing had been occurring due to the ropes not being spliced efficiently together. This is thought to have caused a weakness in the net. During the harvest procedure on 01/06/2022, two of the pens eight built in winches had failed, the site had to use boat operated winches to temporarily take the strain from faulty pen side winches to lower the net. It is believed that this operation has resulted in an imbalance of weight distribution and tension when lowering the sinker ring, which has led to the net tearing the weakened area.

The business has not yet submitted an estimate for the number of fish lost. The GHCO stock is due to be harvested out of Groatay on the 7th August where counts from the harvest boat will be submitted to the FHI. FHI have since followed up with the business but no final figure has been received to date.

FHI Investigation

The FHI conducted an escapes investigation and enhanced containment audit on 26/07/2022.

GHCO was followed on the 23rd June 2022 following the notification of an escape incident at pen 42, all fish were transferred to a nearby site Groatay. Pictured below are that of pen 42 on the date of inspection and a picture of one of the 8 built in Gael Force winches installed at the pen.



Winches

Each pen at GHCO has 8 electric winches, positioned approximately with one every six stanchions. Winches are all connected to one electrical box per pen. To operate the winches, this box is manually plugged into the sites work boat where operation of the winches can be conducted to offer either individual operation or synchronous operation. There is a manual kill switch for health and safety on each winch (red button on the side). All winches have a “failsafe” rope and chain near/next to them connected to the sinker tube and the cage. The failsafe rope can be used to lift the sinker tube if the winch was to fail.

On the 1st June 2022 during the preparation of pen 42 for harvest it was found that two winches, positioned side by side were not functioning. The winches had been checked a week prior to the harvest by site staff and were reported to be operational. At the time, pen 42 was the only pen on starve and ready to be harvested, so the harvest could not be deferred to another pen. According to the (REDACTED), the normal ‘procedure’ for when a winch fails is to lift the working winches to the halfway point, then manually lift the rope for the winch that has failed with the boat to the half way point, after that lift the winches the remainder of the way up, followed by the manual lift with the boat to the top. This procedure was followed in order to carry out the harvest on the 1st June and no further issues were reported by site staff to site management.

Damage to the net of pen 42 was identified the following morning by the net washing team, divers were then deployed to fix an approximate tear of 8m x 0.3m to the side of the net, originating from the base up the side wall of the net.

Following the identification of this damage, Gael Force visited the site to repair the faulty winches and service the remaining winches at pen 42. It was found that the two failed winches had suffered from an electrical fault which was repaired onsite. All winches were deemed fit for use following the service.

Nets



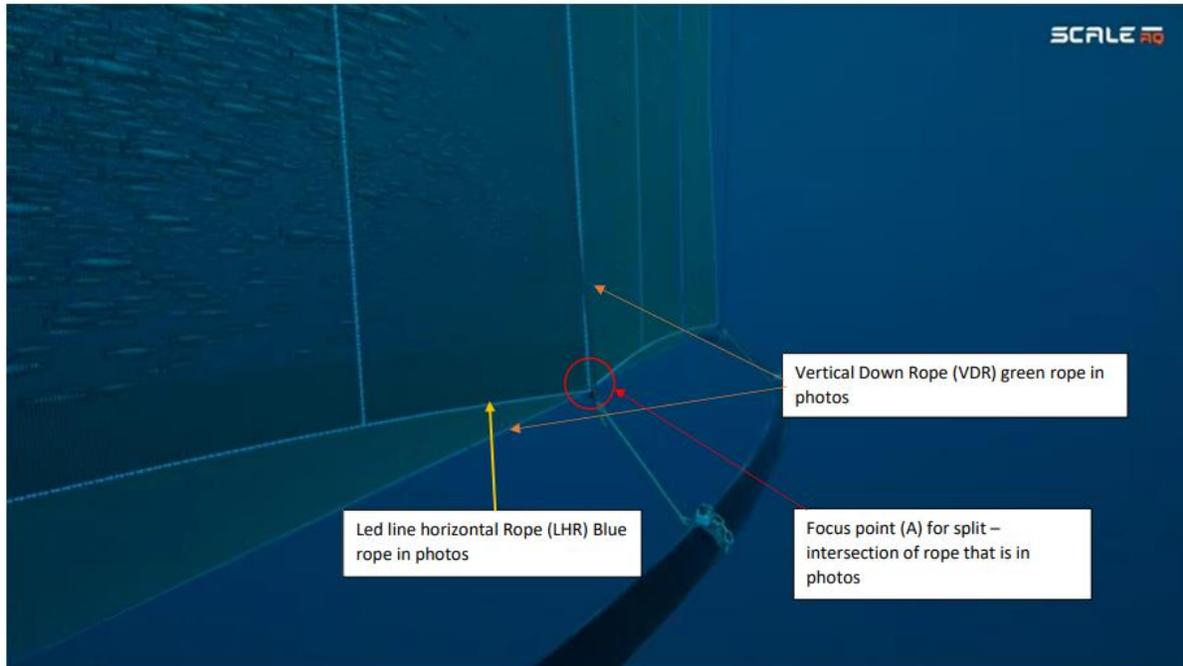
Following the escapes incident, all remaining fish at GHCO were transferred to the companies nearby site Groatay to allow for an in depth investigation of the sites equipment. It was found that the nets, 18mm Aqualine AS Midgard nets had a flaw in their design which is now believed to have caused a weakness in the net which otherwise would have prevented this damage from occurring. It was found that the lead line was not properly spliced into the vertical rope at the join, instead the vertical rope was “looped” over the leadline. This had allowed for friction to occur overtime causing chaffing of the net around this area. Following the discovery of the issue with the design in the net, a meeting occurred between site management and the net manufacturer which resulted in all nets of this type and design being altered to prevent any chaffing at the rope joins along the base of the nets by splicing the ropes of the base lead line and vertical ropes together. All nets at GHCO are to be removed from service and to be replaced with new HDP nets for the next production cycle.

16/08/2022 (REDACTED) & (REDACTED)

#10 – Mowi Rope Damage Photos:

Visual Illustration of Rope Damage

Image 1.0 – Reference picture for context to photos



Visual Illustration of Rope Damage



Example of the splice/binding of focus point (A) in Image 1.0. – note that VDR is running over LHR



Example of the splice/binding of focus point (A) in Image 1.0. – example of rubbing of VDR on the LGR

Visual Illustration of Rope Damage



Photo of where split occurred – can see fraying of LHR causing it to break – transferring additional weight to net along VDR further exaggerated by the sinker tube being down.

#11 – Mort uplift information (extracted from VHWP)

Extracted Text from VHWP part 2 & 3

Mortality removal	<p><i>Mortalities are removed daily using uplifts where available unless weather or other conditions do not permit. If uplifts are unsuitable for use at any particular site, mortalities are collected in dead socks and manually removed. All nets used to remove mortalities are disinfected before re-use in other pens. Mortality numbers and cause are recorded in the daily diary & on FishTalk. Classification of mortality should be appropriate (Refer to BIO.REF.11 Mortality Classification).</i></p> <p><i>If weekly mortality increases above 0.3%, Biology must be notified so that a health screen can be conducted, and cause of mortality investigated.</i></p>
Disposal of dead fish	<p><i>Dead and moribund fish can act as breeding grounds for microorganisms such as bacteria, fungus and viruses. Some of these microorganisms can pose a risk to the health of the living salmon. In order to minimise the exposure of living salmon to potentially dangerous microorganisms, the dead and moribund fish must be removed from the net as quickly as possible and disposed of in a controlled manner.</i></p> <p><i>Where possible, moribund fish should also be removed, humanely dispatched and disposed of in the same manner as mortalities. Most sites now use external mortality removal companies, that supplies on shore skips for fish waste. These are then routinely lifted and taken for further processing. Current collection companies include Billy Bowie, Gogar, Fergusons, JA MacDonald Haulage & Denholm Environmental Ltd (AKA Hazco).</i></p> <p><i>Mortalities may be disposed of at Dundas, Whiteshore Cockles, Barkip Biogas Ltd, Energen Biogas Ltd, Earnside Energy, Binn Skips, although this list is not exhaustive and will be updated as required. Disposal is lead somewhat by the collection company.</i></p> <p><i>All mortalities/waste resulting from on-site processing of waste are securely stored on site before being picked up by a licensed carrier of animal by-products. Copies of waste transfer notes are held by the relevant sites.</i></p>

#12 – Scottish Salmon Company Removal & Movement of Fish Mortalities (March 2022)

BIO.WKI.17
Date of Edit: 9.03.2022
Version: 2

**The Scottish
Salmon Company**
Companaidh Bhradan na h-Alba



Removal and Movement of Fish Mortalities

Purpose

To ensure the correct Biosecurity steps are taken during the removal and disposal of morts. Includes equipment used for transferring morts to a shared mortality collection point where applicable.

Scope

This procedure will cover the removal, transfer and disposal of morts from a site to its shorebase, and the removal and disposal of morts to a shared mortality collection point (i.e. a shorebase not routinely used by the farm). Applies to all SSC sites (freshwater, broodstock and marine)

Responsibility and Authority

Site managers, Production Managers, Staff, Biology Dept, Environmental Dept.

Procedure

It is vital to ensure that all staff are familiar with the Code of Good practice and that biosecurity measures are met. Maximal biosecurity measures should be implemented whilst removing mortalities to reduce environmental impacts, the risk of cross contamination and any impact to the health of remaining fish. PPE used for mortality removal should be restricted to a designated area where appropriate, and strict hygiene policy adhered to at all times. Any failings in biosecurity should be reported and recorded as per company procedure (BIO.SOP.49 Reporting suspected and real breaches of biosecurity & welfare).

Before removing dead fish, ensure site specific PPE is available and staff are aware of the risks involved. All equipment used should be clean and be in good working order. Only trained staff are to use specialised equipment. Where contracted external staff are to be used in mortality removal, they should also receive appropriate training, and an SSC member of staff should be available to supervise the operations, ensuring that good hygiene practices are maintained throughout.

Virkon disinfectant is to be mixed with freshwater, to a strength of 1% (75g of product with 10L of freshwater). The mixture will be pink in colouration. Once the disinfectant loses its pink colouration or has a smell of bleach, the solution must be changed, as it is no longer effective. If moving to/from a site with a known pathogen, additional biosecurity measures may need to be implemented and a risk assessment performed for the movement of mortalities. These will be communicated to the vessel crew ahead of movements by SSC site managers/biology.

Prior to Loading

- Before the mortality removal vessel enters a new management area, the deck of the vessel is to be cleared of all organic debris (weed, mussels, bait, etc.), and the deck is to be thoroughly sprayed with Virkon (or other suitable broad spectrum disinfectant).
- Mort bins should be visually inspected for damage and sprayed with Virkon
 - Bins with holes or visible damage should not be used
 - All bins must have a securable lid
- Only designated mort bins should be used for fallen stock to minimise the risk of contamination when performing other tasks.
- Adequate numbers of bins should be available to minimise the risk of over filling and/or not having sufficient capacity to remove all carcasses.

During Loading

- Before removing mortality ensure that brail net is positioned and secured directly below lift up outlet pipe.
 - Where hard top pipes are in place, the brailer net can be tied/secured to the uplift pipe
 - Where soft/flexible pipe is used, the brailer net must be tied to the handrail to reduce the risk of brail net falling from the pipe



- When net has been appropriately filled all lifting must be over the mid ship of the vessel and not over the bow to eliminate lifting over open water.
- The brail net fully filled should not exceed the capacity of the mortality bin.
- Ensure brail net is positioned over harvest bin for discharge
 - Cod end system ensures that all mortalities are dropped directly into tub below
 - Cod end must not be discharged until brail net is in position, and crane has stopped moving
- Ensure all fallen stock is carefully placed into mort bins and no stock falls outside the bin onto the vessel deck.
 - In event that any carcasses fall outwith the bin, immediate recovery must take place
- Once the mort bin is filled, a lid is placed on the bin and securely fastened. The outside of the bin and the vessel deck will be thoroughly sprayed with Virkon (or other suitable broad spectrum disinfectant).
- Mort bins should never be overfilled and there should be no leaks.

After Loading

- All equipment used during the removal and disposal of mortalities should be cleaned and disinfected after use.
- Disinfection records must be maintained and presented upon request.

When unloading mort bins at the shorebase, the same biosecurity measures should be adhered to. Bins should be checked for leaks before unloading starts, and all bins should be unloaded into a designated area, which should be adequately separated from other working areas of the shorebase. Ideally bunding should be in place to minimise the risk of spill. Site specific PPE should be worn in this area, and access restricted where additional biosecurity measures are in place for disease control. Bins should remain closed and contained until either carefully emptied into a closed skip or directly uplifted by an external mortality removal company (see VHWP Part 2 & 3). Once morts are collected, all bins should be cleaned and disinfected before being moved to any other site for mort collection. Records should be kept of disinfection.

References

- SEA.SOP.3 Event Mortality Procedure
- SEA.REF.8 Uplift Manual
- SEA.REF.10 Mort Removal Equipment Risk Assessment
- BIO.SOP.49 Reporting suspected and real breaches of biosecurity & welfare
- Code of Good Practice Chapter 4
- Marine Safe Working Practise
- COSHH



West Strome, Lochcarron: 22Q3 Site Specific Fish Mortality Plan

Reviewed: 1.03.2022 ((REDACTED))

Background Mortalities

All moribund and mortality fish are removed from pens daily where it is safe to do so, but weekly as a minimum, by the use of an air LIFTUP system. All mortality material is carefully transferred to lidded holding bins and transferred to the site shorebase. Whole carcasses are collected into sealed skips and routinely removed by Billy Bowie, a third party contractor. In normal circumstances, mortalities are usually transported to Dundas Biogas for further processing, however the destination of the waste is determined by the removal contractor. A list of other processing sites can be found in the VHWP Part 2 & 3.

Event Mortality

Where event mortality occurs, which is usually defined as greater than 100T per week, or a volume which is above the capacity of the site deal remove or store, additional steps will be taken.

The West Strome site has purchased and has in store several new brail nets specifically for the task of increased mortality removal. These brailers are made with stronger nylon and have stainless steel rings, designed to take additional weight. If event mortality occurs these would be used across the farm, and then disposed of at the end of the event and replaced, to minimise the risk of used equipment malfunctioning when needed.

Further equipment is being explored, including the same brail nets with gun/cod-end attachment for easier discharge of mortalities into bins. In order to make brail nets stronger, the netting used will be off-cuts off Seal Pro cage nets.

Due to a breach in biosecurity during the event mortality in the 20S0 cycle, training has been delivered to site staff on appropriate mortality removal, via a Toolbox Talk, which has been signed off and will be registered in staff training records. Specifically this includes the avoidance of swinging full brail nets over open water, rather keeping the net over the cage until ready for discharge, thereby minimising the risk of mortalities being released outside of the cage area. Any external contractors that will assist in mortality removal at the site will be required to read and understand this Toolbox Talk before beginning mortality removal operations at the farm.

The West Strome site will increase the number of mortality bins available, not only for West Strome, but for nearby Torridon and Portree, ensuring that bin capacity is not a limiting factor in removing morts swiftly. These will be stored in the West Strome shorebase.

Third party contractors will be hired in to assist with the removal/disposal/processing of event mortality – see list in the VHWP Part 2 & 3. SSC is in the process of contracting ScanBio



(Inverness) into the list of third party contractors, as a disposal site and/or skip supplier located nearby to the area.

SSC has additional mortality storage and processing capacity in the Bakkaness vessel, which removes via Uplift into tanks for maceration and ensiling. The vessel has a 900T tank capacity for the storage of ensiled waste.

Finally, SSC will continue to explore novel mortality removal techniques, including the dewatering of mortalities directly into bins or skips, where the appropriate supporting vessel is available to enable this procedure.



West Strome, Lochcarron: 22Q3 Site Specific Fish Mortality Plan

Reviewed: 9.03.2022 (REDACTED)

Background Mortalities

All moribund and mortality fish are removed from pens daily where it is safe to do so, but weekly as a minimum, by the use of an air LIFTUP system. All mortality material is carefully transferred to lidded holding bins and transferred to the site shorebase. Whole carcasses are collected into sealed skips and routinely removed by Billy Bowie, a third party contractor. In normal circumstances, mortalities are usually transported to Dundas Biogas for further processing, however the destination of the waste is determined by the removal contractor. A list of other processing sites can be found in the VHWP Part 2 & 3.

Event Mortality

Where event mortality occurs, which is usually defined as greater than 100T per week, or a volume which is above the capacity of the site deal remove or store, additional steps will be taken.

The West Strome site has purchased and has in store several new brail nets specifically for the task of increased mortality removal. These brailers are made with stronger nylon and have stainless steel rings, designed to take additional weight. If event mortality occurs these would be used across the farm, and then disposed of at the end of the event and replaced, to

minimise the risk of used equipment malfunctioning when needed.

When brail nets are used for mortality collection, the nets will be secure either to the hard pipe at the top of the uplift system, or the handrail to prevent slippage when lifting morts. Brail nets will not be filled to more than the capacity of the collection bins.

Further equipment is being explored, including the same brail nets with gun/cod-end attachment for easier discharge of mortalities into bins. In order to make brail nets stronger, the netting used will be off-cuts off Seal Pro cage nets.

Due to a breach in biosecurity during the event mortality in the 20S0 cycle, training has been delivered to site staff on appropriate mortality removal, via a Toolbox Talk, which has been signed off and will be registered in staff training records. Specifically this includes the avoidance of swinging full brail nets over open water, rather keeping the net over the cage until ready for discharge, thereby minimising the risk of mortalities being released outside of the cage area. Any external contractors that will assist in mortality removal at the site will be required to read and understand this Toolbox Talk before beginning mortality removal operations at the farm. An SSC member of staff will supervise the operations undertaken by



external parties – this member of staff will be trained and competent in mortality removal operations.

The West Strome site will increase the number of mortality bins available, not only for West Strome, but for nearby Torridon and Portree, ensuring that bin capacity is not a limiting factor in removing morts swiftly. These will be stored in the West Strome shorebase.

Third party contractors will be hired in to assist with the removal/disposal/processing of event mortality – see list in the VHWP Part 2 & 3. SSC is in the process of contracting ScanBio (Inverness) into the list of third party contractors, as a disposal site and/or skip supplier located nearby to the area.

SSC has additional mortality storage and processing capacity in the Bakkaness vessel, which removes via Uplift into tanks for maceration and ensiling. The vessel has a 900T tank capacity for the storage of ensiled waste.

Finally, SSC will continue to explore novel mortality removal techniques, including the dewatering of mortalities directly into bins or skips, where the appropriate supporting vessel is available to enable this procedure.

References

BIO.WKI.17 Removal & Movement of Fish Mortalities

[#15 – Scottish Salmon Company Breach of Biosecurity at West Strome – reminder letter from Scottish Government \(March 2022\)](#)

marine scotland



Scottish Government
Riaghaltas na h-Alba
gov.scot

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MS.fishhealth@gov.scot

By Email only

(REDACTED)
1 Smithy Lane
Argyll
Argyll
Lochgilphead
PA31 8TA

Our ref: PROJ/36835

15/03/2022

Dear (REDACTED),

**BREACH OF THE AUTHORISATION CONDITIONS ISSUED
UNDER REGULATION 6 OF
THE AQUATIC ANIMAL HEALTH (SCOTLAND) REGULATIONS 2009**

The Scottish Salmon Company (FB0169) was issued with a warning letter on 22nd December 2021 for a breach of authorisation, in relation to the biosecurity during mortality removal operations at the West Strome (FS1342) fish farm site on the 8th of September 2021.

The Scottish Salmon Company were required to submit a detailed mortality removal procedure to ensure good biosecurity practices are being followed by 28th February 2022. This has been provided to Marine Scotland and the breach of authorisation conditions has now been resolved.

This letter also serves as a reminder to ensure that the requirements of the conditions of your authorisation to operate as an APB are met. The business may be subject to further inspection and recommendations in the future.

Please contact me if you have any further queries or require any further information regarding this issue.

Yours sincerely

(REDACTED)

(REDACTED)
Technical Manager Fish Health Inspectorate

Marine Scotland, Marine Laboratory,
375 Victoria Road, Aberdeen, AB11 9DB
www.gov.scot/Topics/marine



[#16 – Scottish Salmon Company Breach of Biosecurity at West Strome – warning letter from Scottish Government \(December 2021\):](#)

marine scotland



Scottish Government
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By Email only

[Redacted]
1 Smithy Lane
Argyll
Argyll
Lochgilphead
PA31 8TA

Our ref: PROJ/36835

22/12/2021

Dear [Redacted]

**BREACH OF THE AUTHORISATION CONDITIONS ISSUED
UNDER REGULATION 6 OF
THE AQUATIC ANIMAL HEALTH (SCOTLAND) REGULATIONS 2009**

The Scottish Salmon Company (FB0169) is an aquaculture production business (APB) which is authorised to operate under regulation 6 of the Aquatic Animal Health (Scotland) Regulations 2009 (the 2009 Regulations). This authorisation requires the APB to operate following good biosecurity practice to ensure the operation of the business will not lead to an unacceptable risk of spreading disease.

On 10th September 2021, the Fish Health Inspectorate were made aware that a breach in biosecurity had occurred during mortality removal operations at the West Strome (FS1342) fish farm site on the 8th of September 2021. The breach involved the use of a mortality removal system and a brail net which did not contain all mortalities for appropriate disposal.

Therefore The Scottish Salmon Company has not complied with Condition 8 of the APB authorisation issued on 11th August 2021 under regulation 6 of the 2009 Regulations states that, 'In accordance with regulation 6(2)(b) of the 2009 Regulations, the operator of the APB will follow good biosecurity practice at each farm site at which it operates, and must establish, maintain and comply with a biosecurity measures plan containing at least the information specified in paragraphs (a) to (f) of Appendix 4 to this Authorisation. The biosecurity measures plan must be made available by the operator of the APB or any staff engaged by or on behalf of that operator, upon request by an inspector.' A copy of Appendix 4 is attached to this letter.

Marine Scotland, Marine Laboratory,
375 Victoria Road, Aberdeen, AB11 9DB
www.gov.scot/Topics/marine



Failure to comply with the requirements of the 2009 Regulations requires the Fish Health Inspectorate to take enforcement action in accordance with that detailed in the Fish Health Inspectorate Service Charter. This may include issuing:

- a warning letter;
- an enforcement notice under regulation 39 of the 2009 Regulations;
- a notice of suspension of authorisation under regulation 10 of the 2009 Regulations;
- a notice of revocation of authorisation under regulation 11 of the 2009 Regulations; or
- a caution;

and can lead to prosecution if a serious offence takes place or there are persistent minor offences. A person guilty of an offence under The Aquatic Animal Health (Scotland) Regulations 2009 is liable on summary conviction, to a fine not exceeding the statutory maximum or on conviction on indictment, to a fine. A copy of the charter can be found at the following web address: <http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/FHI/charter>

On this occasion the Fish Health Inspectorate appreciates the information provided by The Scottish Salmon Company by e-mail on 13th September and 8th October 2021 regarding:

- the breach of biosecurity during mortality removal;
- the improved procedures for mortality removal using a brail net for a level of mortality above that which the normal site husbandry procedures can accommodate;
- the review of brail net construction to ensure containment;
- the potential to use an integrated mortality removal and de-watering system which will remove the requirement for a brail net to deliver mortalities to the storage container.

This letter serves as a warning letter regarding the breach of the 2009 Regulations and requires The Scottish Salmon Company to provide, by 28th February 2022, a detailed mortality removal procedure to ensure good biosecurity practices are being followed, indicating where improvements have been made, for occasions where the normal site husbandry procedures are unable to accommodate the level of mortality being experienced. This should be provided to the Fish Health Inspectorate, for the attention of Ron Smith, by either e-mail or post at the following contact details:

E-mail: MS.FishHealth@gov.scot;

Post: Marine Scotland Science, Fish Health Inspectorate, Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB

This letter also serves as a reminder to ensure that the requirements of the conditions of the authorisation provided to The Scottish Salmon Company to operate as an APB are being complied with at each farm site at which the APB operates.

Please contact me if you want to discuss this letter or if you require any further information

Yours sincerely
[Redacted]

Technical Manager Fish Health Inspectorate

Appendix 4 - Condition 8

Minimum information to be included in a biosecurity measures plan and complied with by the APB in respect of each site for the purposes of condition 8

- (a) The manner and frequency in which mortalities will be removed, recorded and safely disposed of by the APB;
- (b) The manner and period in which the APB will notify⁽¹⁰⁾ Scottish Ministers or a veterinary professional of any increased or unexplained mortalities in aquaculture animals held on each farm site;
- (c) The actions that will be taken by the APB in the event that the presence or suspicion of the presence of any listed disease⁽¹¹⁾ is detected and how and when that will be notified⁽¹⁰⁾ to the Scottish Ministers;
- (d) The minimum health status of aquaculture animals to be stocked on the farm site, to ensure that stocks being placed on the farm site shall only be sourced from farms of an equal or higher health status and where required, certified as such;
- (e) The husbandry and biosecurity measures to be implemented between epidemiological units⁽¹²⁾ on the farm or between farms to ensure the transmission of fish diseases by the movement of staff, visitors, equipment and live or dead fish is minimised; and
- (f) The measures that are in place at the farm site to maintain the physical containment of the aquaculture animals held on the farm site.

¹⁰ Notification should be made in writing to the Fish Health Inspectorate, Marine Scotland Science, Marine Laboratory, 375 Victoria Road, Aberdeen AB11 9DB; or by Tel to 0131 244 3498; or by email to MS.fishhealth@gov.scot

¹¹ "Listed disease" means–

(a) a disease listed in the second column of the table in Annex 1A to Commission Regulation (EC) No 1251/2008. Please note that Commission Regulation (EC) No 1251/2008, as it applies in Scotland, can be obtained from the National Archives website (www.legislation.gov.uk) or by contacting the Fish Health Inspectorate; or

(b) a disease listed in the first column of Schedule 1 to the Aquatic Animal Health (Scotland) Regulations 2009 ("the 2009 Regulations"). Please note that the 2009 Regulations and associated amendments can be obtained from the National Archives website (www.legislation.gov.uk) or by contacting the Fish Health Inspectorate.

¹² "Epidemiological unit" means each individual holding facility, e.g. each cage, tank, raceway, pond etc.

Marine Scotland, Marine Laboratory,
375 Victoria Road, Aberdeen, AB11 9DB
www.gov.scot/Topics/marine



[#17 – Scottish Salmon Company Biosecurity Breaches at West Strome – email dossier](#)

Biosecurity Breaches - West Strome

From: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Sent: 15 March 2022 10:42

To: (REDACTED) <(REDACTED)@scottishsalmon.com>

Subject: RE: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED)

Thanks for sending the update through. Please find attached a letter confirming that the breach of authorisation issue detailed in the warning letter of 22 December 2021 has been resolved.

Regards
(REDACTED)

From: (REDACTED) <(REDACTED)@scottishsalmon.com>

Sent: 09 March 2022 16:04

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Subject: RE: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED)

Apologies for the delay in getting back to you.

We have reviewed our mortality removal SOP (see attached), to include securing of the brailer net to the uplift pipe – with the newer system that have hard pipes at the top, it is possible to secure directly to the pipe, otherwise we advise securing to the handrail to prevent the net popping off during discharge. The highlighted section is largely the reviewed bit.

Ive also reattached the Fish Mortality Plan, which now states that an SSC member of staff would supervise the external contractors – i.e. someone trained and competent would go on the vessel for the day and assist with the mort collection task.

Please let me know if there is anything else that needs to be covered.

Thanks

(REDACTED)

(REDACTED)

Unit 1, Smithy Lane

Lochgilphead, PA31 8TA

Tel: (REDACTED)

(REDACTED)

(REDACTED)

www.scottishsalmon.com

shop.scottishsalmon.com

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 02 March 2022 15:48

To: (REDACTED) <(REDACTED)@scottishsalmon.com>

Subject: FW: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED)

Thank you for providing the response in relation to the biosecurity of mortality removal at West Strome. The improvements being made in providing upgraded equipment, training for staff and contractors, and efforts to increase the list of approved contractors for mortality removal and disposal are very much appreciated.

One of the issues involved the use of unsecured brail nets which were not always in the appropriate position to collect – it does highlight that there may be some loss of biosecurity was in use. It would be appreciated if the procedure in place for the use of the air LIFTUP system for mortality removal was detailed/clarified or a reference to an SOP was provided. Particularly in relation to the collection and transfer of mortality material to the holding bins and preventing the potential discharge of mortality material without appropriate containment. It may also be helpful to consider and document the supervision that will be in place for contractors who are involved during an event mortality.

I look forward to receiving any further details on the use of the air LIFTUP system to prevent discharge of mortalities, if you have any queries please let me know.



220301 West
Strome Fish Mortalit



SEA.REF.1 VHWP
Part 2 3 Marine Proc

From: (REDACTED) <(REDACTED)@scottishsalmon.com>

Sent: 01 March 2022 16:15

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Subject: RE: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED),

Please find attached the Fish Mortality Plan for West Strome, reviewed with the site staff following the breach in biosecurity.

I also attach the VHWP Part 2 & 3 document, which contains detail of third party contractors that may be used during event mortality – I have highlighted the relevant sections.

Please let me know if this is satisfactory to cover off the non-conformance.

Warm Regards

(REDACTED)

(REDACTED)

Unit 1, Smithy Lane

Lochgilphead, PA31 8TA

Tel: (REDACTED)

(REDACTED)

(REDACTED)

www.scottishsalmon.com

shop.scottishsalmon.com

From: (REDACTED) <(REDACTED)@scottishsalmon.com>

Sent: 01 March 2022 08:59

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Subject: RE: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED)

I must apologise, this had fallen off my radar slightly. I have just had a catch up with the site guys so have some detail on what has been improved with regards to mortality removal, so I will get that written up today and hopefully sent over to you later this afternoon, or tomorrow.

Warm Regards

(REDACTED)

(REDACTED)

Unit 1, Smithy Lane

Lochgilphead, PA31 8TA

Tel: (REDACTED)

(REDACTED)

(REDACTED)

www.scottishsalmon.com

shop.scottishsalmon.com

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 28 February 2022 09:16

To: (REDACTED)<(REDACTED)@scottishsalmon.com>

Subject: FW: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED),

Information in relation to the requirements of the attached warning letter, issued in December 2021, is due today. If you anticipate difficulties in supplying this information please let me know.

Regards
(REDACTED)

From: (REDACTED)(MARLAB)

Sent: 22 December 2021 10:18

To: (REDACTED)<(REDACTED)@scottishsalmon.com>

Subject: Warning Letter for Breach of Biosecurity during Mortality Removal at West Strome (FS1342)

Hi (REDACTED),

Please see the attached warning letter regarding the breach of biosecurity at West Strome during mortality removal procedures. If you have any queries please let me know.

From: (REDACTED) (MARLAB)
Sent: 11 October 2021 17:10
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: FW: Biosecurity breach at West Strome

Hi (REDACTED),

Here's the response. We can discuss and provide any further response.

Cheers

(REDACTED)

From: (REDACTED) <(REDACTED)@scottishsalmon.com>
Sent: 08 October 2021 10:33
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: RE: Biosecurity breach at West Strome

Hi (REDACTED)

Apologies for the delay – comment below.

The footage, without commentary, is inconclusive of biosecurity risk. We are glad to see adherence to our diligent procedures to recover mortalities. Fish should not be spilled from the brail net and we are reviewing net construction with our main net supplier to prevent spillage in the future.

We are also looking into de-watering systems which will link directly from the pen mortality removal system onto the boat, delivering mortality directly into the holding container on deck. This negates the need for a crane to be involved in the process.

Warm Regards

(REDACTED)

(REDACTED)

(REDACTED)

Unit 1, Smithy Lane

Lochgilphead, PA31 8TA

From: (REDACTED) <(REDACTED)@sepa.org.uk>
Sent: 04 October 2021 16:33
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: RE: West Strome

Official

Good afternoon (REDACTED)

Seeking confirmation re any further action by SEPA or referral to another organisation. Will advise asap.

Regards,

(REDACTED)

(REDACTED), m: (REDACTED), e: (REDACTED)@sepa.org.uk, [web: www.sepa.org.uk](http://www.sepa.org.uk)

Official

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 01 October 2021 11:58

To: (REDACTED) <(REDACTED)@sepa.org.uk>

Cc: (REDACTED) <(REDACTED)@sepa.org.uk>

Subject: RE: West Strome

Hi (REDACTED)

This is very disappointing with regard to the biosecurity of operations at the site and the FHI will contact the company to obtain any further view. We will keep you up to date with any further correspondence.

We will consider this issue from a fish health perspective in relation to the authorisation granted to the company to operate under regulation 6 of the Aquatic Animal Health (Scotland) Regulations 2009.

Will Sepa be considering any further action in relation to the appropriate disposal of animal by-products? Or does this fall to the local authority?

Regards

(REDACTED)

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>
Sent: 01 October 2021 09:29
To: (REDACTED) <(REDACTED)@scottishsalmon.com>
Subject: Biosecurity breach at West Strome

Hi (REDACTED)

We have received a link to a video in relation to the breach of biosecurity at West Strome when mortalities were being removed by the LiftUp system. The link is:

(REDACTED)

The stated discharge of mortalities to open water doesn't seem to be too obvious, but the description of the unsecured brail net losing position and a member of staff collecting fish to be placed in the brail can be viewed. If you have any problems in accessing the footage let me know.

TSSC are authorised to operate as an APB at the site registered as West Strome on the basis that the operation will not lead to an unacceptable risk of spreading disease and that the APB will follow good biosecurity practice in the operation of the site.

We would welcome any further comment in relation to this operation, whilst consideration is given to any follow up action.

Regards

(REDACTED)

(REDACTED)

Technical Manager - Fish Health Inspectorate

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375, Victoria Road | Aberdeen AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

Mob:(REDACTED)

FAX: (REDACTED)

e: (REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

From: (REDACTED) <(REDACTED)@sepa.org.uk>

Sent: 30 September 2021 16:56

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Cc: (REDACTED) <(REDACTED)@sepa.org.uk>

Subject: RE: West Strome

OFFICIAL – BUSINESS

(REDACTED)

SEPA has been provided with a 3rd video regarding the West Strome fish farm site: (REDACTED) (a strange looking link but it is correct). The complainant advised “*Yes, This is the vid of salmon going directly in to the sea at strome lohcarron, cheers*”. The video appears to start a short time after their

stated observation and does not show an occurrence of overpumping salmon into the sea, but does indicate a worker moving a salmon from the sea and placing it into the net.

Any access issues or questions, let me or Stuart know,

Regards,

(REDACTED)

(REDACTED), m: (REDACTED), e: (REDACTED)@sepa.org.uk, [web: www.sepa.org.uk](http://www.sepa.org.uk)

From: (REDACTED) (REDACTED)@sepa.org.uk>

Sent: 17 September 2021 15:47

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Subject: RE: West Strome

OFFICIAL – BUSINESS

Hi (REDACTED)

I've tried to get more information directly from the complainant but not yet received any response.

SEPA hasn't been provided with any footage that shows this happening.

If I get any more then I'll get back to you.

(REDACTED)

OFFICIAL – BUSINESS

From: (REDACTED)@gov.scot <(REDACTED)@gov.scot>

Sent: 17 September 2021 15:23

To: (REDACTED) <(REDACTED)@sepa.org.uk>

Subject: RE: West Strome

Hi (REDACTED)

I've queried the company and the (REDACTED) has discussed with staff and external contractors. They have stated that they are unaware of any fish being

discharged directly to open water from the Uplift mortality removal system. The morts were being removed by discharging from the Uplift into the brail net attached to the hydraulics of the workboat. The only breach of mortality containment that staff have acknowledged is that observed falling from the brail net during the lift.

The company have expressed concern at the allegation and would welcome any footage which shows that this occurred. They have also asked that if there is more evidence could this be used to identify the orientation of the pen involved to help them in any sea bed survey or follow up actions as this clearly is not acceptable. Has this footage been made available by the complainant?

Regards

(REDACTED)

(REDACTED)

Technical Manager - Fish Health Inspectorate

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375, Victoria Road | Aberdeen AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

Mob:(REDACTED)

FAX: +44 (0)131 244 0944

e:_(REDACTED)@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

From: MS FishHealth <MS.FishHealth@gov.scot>

Sent: 17 September 2021 11:18

To: (REDACTED) (MARLAB) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>; (REDACTED) (MARLAB) <[\(REDACTED\)@gov.scot](mailto:(REDACTED)@gov.scot)>

Subject: FW: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Hi

Please see further correspondence regarding West Strome.

Would you like me to respond with the same line that it will be published in due course?

From: (REDACTED) <[\(REDACTED\)@gmail.com](mailto:(REDACTED)@gmail.com)>

Sent: 17 September 2021 11:03

To: MS FishHealth <MS.FishHealth@gov.scot>

Subject: Re: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Simple question: have you visited West Strome salmon farm since 6 September 2021?

On Fri, Sep 17, 2021 at 10:14 AM <MS.FishHealth@gov.scot> wrote:

Dear (REDACTED)

Information on any surveillance undertaken will be published in due course.

(REDACTED)

(REDACTED)

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

From: (REDACTED) <[\(REDACTED\)@gmail.com](mailto:(REDACTED)@gmail.com)>

Sent: 17 September 2021 09:58

To: MS FishHealth <MS.FishHealth@gov.scot>

Subject: Re: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Have you visited West Strome salmon farm since 6 September?

On Fri, Sep 17, 2021 at 9:52 AM <MS.FishHealth@gov.scot> wrote:

Dear (REDACTED)

Following the receipt of your complaint, MSS are considering the information in relation to fish health regulation. No further information is available whilst the investigation is ongoing. Information on any surveillance undertaken will be published in due course.

(REDACTED)

(REDACTED)

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

From: (REDACTED) <(REDACTED)@gmail.com>

Sent: 17 September 2021 09:31

To: MS FishHealth <MS.FishHealth@gov.scot>

Subject: Re: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Surely Marine Scotland is the competent authority for enforcement of this policy, which exists entirely to deliver higher welfare?

....

From: MS FishHealth <MS.FishHealth@gov.scot>

Sent: 17 September 2021 09:29

To: (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>

Subject: FW: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Morning all

Please see below follow up from (REDACTED).

Would the following be suffice? Happy for any advice or suggestions

"Dear (REDACTED)

The FHI are undertaking investigations at The Scottish Salmon Company West Strome salmon farm in Loch Carron. A site inspection has been conducted and the case information will be published in due course in line with our publication procedures.

Duty Inspector"

Thanks
(REDACTED)

(REDACTED)
Marine Scotland – Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)
S/B: +44 (0)131 244 2500

From: (REDACTED) <(REDACTED)@gmail.com>

Sent: 17 September 2021 08:51

To: MS FishHealth <MS.FishHealth@gov.scot>

Subject: Re: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

APHA does not provide details or reply in any material way.

Have FHI visited West Strome salmon farm to inspect the lice-infested fish?

On Fri, Sep 17, 2021 at 8:34 AM <MS.FishHealth@gov.scot> wrote:

Dear (REDACTED)

Thank you for your email requesting an update on the welfare inspection at The Scottish Salmon Company's West of Strome salmon farm in Loch Carron.

I note you have addressed this enquiry to APHA who are responsible for investigating complaints about the welfare of farmed fish in Scotland. It will be for them to respond as appropriate.

(REDACTED)

(REDACTED)

Marine Scotland – Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

e: MS.fishhealth@gov.scot

From: MS FishHealth <MS.FishHealth@gov.scot>

Sent: 16 September 2021 13:45

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; Warwick (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Cc: (REDACTED) <(REDACTED)@gov.scot>

Subject: FW: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Hi folks,

Please see the email below, do we need to respond to Don? If so would this suffice:

'Thank you for your enquiry, there is an ongoing investigation at the West Strome fish farm, a report will be issued in due course.'

Any advice welcome.

(REDACTED)

From: (REDACTED) <(REDACTED)@gmail.com>

Sent: 16 September 2021 12:31

To: MS FishHealth <MS.FishHealth@gov.scot>; APHA.Scotland@apha.gsi.gov.uk; SM-APHA-Enquiries APHA <enquiries@apha.gov.uk>; SCD Wildlife Crime <SCDWildlifeCrime@scotland.pnn.police.uk>

Cc: Gougeon M (Mairi), MSP <Mairi.Gougeon.msp@parliament.scot>; Evans M (Mairi), MSP

<Mairi.Evans.msp@parliament.scot>; Director of Marine Scotland Mailbox

<Directormarinescotland@gov.scot>; Scottish Ministers <Scottish_Ministers@gov.scot>; Burgess A

(Ariane), MSP <Ariane.Burgess.msp@parliament.scot>; Ruskell M (Mark), MSP

<Mark.Ruskell.msp@parliament.scot>; Beamish C (Claudia), MSP

<Claudia.Beamish.msp@parliament.scot>; MSP <Alex.Rowley.msp@parliament.scot>; Mountain E

(Edward), MSP <Edward.Mountain.msp@parliament.scot>; Finnie J (John), MSP

<John.Finnie.msp@parliament.scot>

Subject: Update on welfare inspection at The Scottish Salmon Company in Loch Carron?

Do you have an update on any welfare inspection at The Scottish Salmon Company's West Strome salmon farm in Loch Carron?

In view of the urgency of the health and welfare situation, Scottish Salmon Watch filed a welfare complaint immediately after filming via:

.....

From: (REDACTED) <(REDACTED)@scottishsalmon.com>
Sent: 15 September 2021 08:53
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: West strome mortality

Hi (REDACTED), tried to give you a call regarding the allegation of mortalities being spilt into the sea. Could you give me a ring when you get this? I am out on site till this afternoon.

Thanks

(REDACTED)

From: (REDACTED) (MARLAB)
Sent: 14 September 2021 17:56
To: (REDACTED) <(REDACTED)@scottishsalmon.com>
Subject: RE: week35 lice & mortality data

Hi (REDACTED)

Thanks for the info. We have recently been informed that there may have also been an issue with the lift-up system at the west strome site. Where fish were discharged from the lift up mortality removal system without having a collection vessel in place. This is alleged to have occurred on the 8th September with fish being discharged to open water before site staff attempted to gather the fish.

If you could please check if there has been an issue and provide any information that would be very much appreciated. If there is any ROV footage of the seabed around the cages that would also be helpful in either refuting the allegation or to help TSSC ascertain if remedial work or improvements to equipment and training are required, that would also be helpful.

Regards

(REDACTED)

From: (REDACTED) <(REDACTED)@sepa.org.uk>
Sent: 14 September 2021 10:47
To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>
Subject: West Strome

OFFICIAL – BUSINESS

Hi (REDACTED)

further to our discussion this is the text that came into us regarding the mortality incident at West Strome:

I returned on my own on the 8th of September 2021 and all the salmon were gone from some of the cages. They were busy with a lice boat, a well boat and a mort boat, in my view to cover up the hellish state this farm was in. I have film of salmon falling from the crane net lift where they were pumping out many tons of salmon from the cages. The air lift pipe at one stage was pumping fish directly in to the sea although workers were fast to try and minimise how many morts went to the sea bed especially as I was filming it. This is not acceptable.

Regards

(REDACTED)

From: (REDACTED) <(REDACTED)@scottishsalmon.com>

Sent: 13 September 2021 13:52

To: MS FishHealth <MS.FishHealth@gov.scot>

Cc: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED) <(REDACTED)@gov.scot>

Subject: week 35 lice & mortality data

Hi DI,

Please find week 35 lice & mortality data.

(REDACTED) – thanks for your time on Friday. Please see a brief statement below regarding the mortality removal at West Strome last week. I have been in touch with the (REDACTED) this morning, and mortality seems to have reduced mostly. Cages 10 & 11 are still elevated, and we may take these out through harvest.

“On Wednesday 8th September, the West Strome site (FS1342) was utilising the support vessel (MV Naomi Jennifer) to assist in mortality removal. The boat crane was being operated to lift a brailer net from the cage side to lidded bins on the deck of the boat, which is an additional method of mortality removal, where ‘event mortality’ (mortality above site capacity to remove manually) is being experienced. During this procedure, the crane operator swung the brailer net over the front end of the Naomi Jennifer, subsequently catching the base of the brailer net on the metal work of the boat. This resulted in the brailer net discharging a single fish into the sea. The mortality immediately sunk,

and so was not able to be recovered. As the brailer net was swung in closer to the boat, more fish carcasses are observed falling from the net, however these fish were dropped on to the deck of the boat, and were recovered and disposed of into the containers onboard. All equipment was checked prior to its use, and found to be in good condition. As soon as the mortality was properly disposed of, the torn net was repaired.

To avoid a similar situation from occurring in the future, procedures for mortality removal have been reviewed - all equipment to be used for these purposes, particularly equipment that is not used routinely, must be checked prior to commencing for any signs of damage and actions taken to repair must be recorded. In advance of lifting heavy loads, the surrounding area should be assessed for any potential snag areas that should be avoided."

If you have any questions, please get in touch.

Thanks

(REDACTED)

(REDACTED)

Unit 1, Smithy Lane

Lochgilphead, PA31 8TA

Tel: (REDACTED)

(REDACTED)

(REDACTED)

www.scottishsalmon.com

From: (REDACTED) (MARLAB)
Sent: 10 September 2021 17:37
To: (REDACTED)@SEPA.org.uk
Subject: West Strome Links

Hi (REDACTED)

(REDACTED) has asked me to send you the links for the footage provided by (REDACTED) in relation to the mortality issue at West Strome. There are multiple links in the attached email but those sent on the 10th contain the issue with regards to animal by-product removal/disposal.

I spoke with the company today regarding this breach of biosecurity from our fish health perspective. The company informed me that they lost one mortality in the sea whilst the others landed on the boat (recovered) and the brail net was subsequently repaired. I have requested a written statement as to the situation and the improvements that were put in place, including a timeframe.

We have been experiencing problems with some links in these emails not being accessible unless the viewer registers on the Vimeo website. Hopefully the links will work for yourself. If you require any further info let me know.

Regards

(REDACTED)

From: (REDACTED) (MARLAB)

Sent: 10 September 2021 12:22

To: (REDACTED) (MARLAB) <[\[REDACTED\]@gov.scot](mailto:(REDACTED)@gov.scot)>

Cc: (REDACTED) (MARLAB) <[\[REDACTED\]@gov.scot](mailto:(REDACTED)@gov.scot)>

Subject: RE: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

Hi sorry I'm currently in a remote inspection with Wester Ross but will try to view before meeting with TSSC later.

From: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Sent: 10 September 2021 10:52

To: MS FishHealth <MS.FishHealth@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
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(REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)) (MARLAB) <(REDACTED)@gov.scot>
(REDACTED)<(REDACTED)@gov.scot>

Subject: RE: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

I think SSC need to improve their biosecurity during mortality removal.

(REDACTED)

Fish Health Inspectorate Technical Manager

Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

S/B: +44 (0)131 244 2500

e: (REDACTED)@gov.scot

From: Allan C (Charles) (MARLAB) <(REDACTED)@gov.scot>

Sent: 10 September 2021 10:43

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>

Subject: FW: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

(REDACTED)

This footage is worth reviewing, regarding security of the mort recovery operation – it does highlight that there may be some loss of biosecurity – could you arrange for the arrangements to be checked with the company?

I had a long conversation with the (REDACTED) last night, the loss has been significant, both from primary impact and subsequent controlled removal of additional stocks.

Happy to discuss.

(REDACTED)

(REDACTED)

Marine Scotland | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

Mobile: (REDACTED)

www.gov.scot/marinescotland

From: MS FishHealth <MS.FishHealth@gov.scot>

Sent: 10 September 2021 10:33

To: (REDACTED) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED)<(REDACTED)@gov.scot>;
(REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
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(REDACTED)<(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>; (REDACTED)
(Neil) (MARLAB) (REDACTED) @gov.scot>; (REDACTED)<(REDACTED)@gov.scot>;
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(REDACTED)) (MARLAB) <(REDACTED)@gov.scot>; (REDACTED)(MARLAB) <(REDACTED)@gov.scot>;
(REDACTED)<(REDACTED)@gov.scot>

Subject: FW: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

FYI

From: (REDACTED) <(REDACTED)@gmail.com>

Sent: 10 September 2021 10:28

To: SCD Wildlife Crime <SCDWildlifeCrime@scotland.pnn.police.uk>; MS FishHealth
<MS.FishHealth@gov.scot>; SM-APHA-Enquiries APHA <enquiries@apha.gov.uk>;
APHA.Scotland@apha.gsi.gov.uk

Subject: Re: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

Further to Scottish Salmon Watch's welfare complaint re. Loch Carron, here's video footage of the mort clean up operation in Loch Carron this week:

.....

From: (REDACTED) <(REDACTED)@gmail.com>

Sent: 10 September 2021 10:28

To: SCD Wildlife Crime <SCDWildlifeCrime@scotland.pnn.police.uk>; MS FishHealth <MS.FishHealth@gov.scot>; SM-APHA-Enquiries APHA <enquiries@apha.gov.uk>; APHA.Scotland@apha.gsi.gov.uk

Subject: Re: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

Further to Scottish Salmon Watch's welfare complaint re. Loch Carron, here's video footage of the mort clean up operation in Loch Carron this week:

<https://vimeo.com/601256103/47d3ecd79b>

<https://vimeo.com/601301302/d81e443abd>

Local sources report intense boat activity as The Scottish Salmon Company are clearing out morts - the work boats are operating well into the evening:



Have inspectors visited the crime scene yet or are you going to wait until all the diseased dead bodies are buried?

Best fishes,

(REDACTED)

From: **(REDACTED)** <(REDACTED)@gmail.com>

Date: Tue, Sep 7, 2021 at 9:22 AM

Subject: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

To: SCD Wildlife Crime <SCDWildlifeCrime@scotland.pnn.police.uk>, <MS.fishhealth@gov.scot>, SM-APHA-Enquiries APHA <enquiries@apha.gov.uk>, <APHA.Scotland@apha.gsi.gov.uk>

Please consider this a formal complaint for breaches of the [Animal Health & Welfare \(Scotland\) Act 2006](#) (Section 19: [Unnecessary Suffering](#); and Section 24: [Ensuring Welfare of Animals](#)) by The Scottish Salmon Company in Loch Carron yesterday (6 September 2021).

The video evidence - compiled here as photographic snapshots - speaks for itself and is damning, disturbing and shocking in equal measure: <https://donstaniford.typepad.com/files/photos-at-the-scottish-salmon-company-strome-salmon-farm-in-loch-carron-on-6-sept-2021.pdf>

Scottish Salmon Watch filmed inside the Strome salmon farm in Loch Carron (there are two salmon farms: the one at Strome is fallow and the one at West Strome is the one in question here) from 6.30am to 8am - I am still having trouble accessing the Scotland's Aquaculture web-site as I am still in the field so I cannot give a grid reference but it comes up as:

<http://aquaculture.scotland.gov.uk> > site_details_record ▾

This website uses cookies - Scotland's Aquaculture | Site Details

Site Name, **Strome**. Address, Dunosdale Lochcarron ... Operator, The **Scottish Salmon Company** ... Production reported to Marine Scotland within last 3 years?

<http://aquaculture.scotland.gov.uk> > data > fish_farms_... ▾

Fish Farms Monthly Biomass & Treatment - Scotland's ...

December, 2020, WSTR1, **West Strome**, CAR/L/1100544/V4, The **Scottish Salmon Company** Ltd, 0, More. November, 2020, WSTR1, **West Strome**, CAR/L/1100544/V4 ...

In this photo (shot from Stromeferry) the cage we filmed at is the first one on the outside of Loch Carron - i.e. the furthest West and on the South side of the two rows of cages. It has a yellow marker - X marks the spot:



We launched at 6.15am at first light yesterday (6 September 2021) from North Strome pier - just below Strome Castle and where there used to be a ferry service to Stromeferry - but launching in Stromeferry would be easier for any inspection visit:



After conducting the [Scottish Government and industry-advised biosecurity and disinfectant protocols](#), the Go Pro filming inside the cages revealed shocking video evidence of welfare abuse. Note that at the start of filming ca. 6.30am it was somewhat cloudy and the visibility was poor but we could still see white lesions and clear welfare problems - we stayed filming for ca. 90 minutes until ca. 8am when the Norwegian-registered Ronjafisk well boat came into the loch (local complaints have meant that big boats cannot operate due to noise pollution until 8am). As the early morning progressed the light lifted and some of the footage shot nearer 8am than 7am is more illuminating than other footage - but it all shows endemic and systemic welfare abuse at a population level in the whole cage (and remember that we're only filming in the top 1 metre of the cage - I would encourage filming inside the cages at greater depths). Here's some of the photos (download in full [online here](#)):



A PDF file of all the photos (apologies for the quality but I am still on fieldwork and dealing without high tech video editing and photo software) has been uploaded and is available [online here](#)

Video footage should be available soon and I will email later this week. Filming with a Go Pro camera on a telescopic pole or with an underwater drone or with a diver inside the cages is advised to ground-truth the video footage shot by Scottish Salmon Watch. We only filmed in one cage but suspect welfare abuse across the site. It seems - from the well boat traffic - that the West Strome salmon farm may have received farmed salmon from other sites. Scottish Salmon Watch suspects that The Scottish Salmon Company is using Loch Carron as a triage unit - a hospital for sick salmon.

Certainly, judging by the video footage, the Loch Carron salmon farm is a welfare nightmare with heaven knows what infectious diseases, pathogens, viruses and bacteria. Testing of farmed salmon inside the cages and post mortem testing of fresh mortalities at the bottom of the cages is recommended to gauge the level of viral and disease problems.

ADDs - the OTAQ seal fence - was observed on the cage we filmed at and the red light was on but we heard no obvious ADD sound underwater. When questioned ca. 8.30am before we left the farm, one of the salmon farm workers claimed they had an EPS licence to use ADDs but it had not been triggered in over 100 days and seal predation was not a problem.

Please provide a receipt for this welfare complaint. I would urge a visit ASAP - certainly this week as it seems that the workers on site are busy burying the dead bodies. Locals have complained about the stench coming from the Strome land-base and increased activity - commensurate with a mass mortality and disease outbreak - has been reported in recent weeks.

When I was told not to film by the Scottish Salmon Company yesterday (a manager came out in a work boat and followed me in my kayak) ca. 8.30am I told the workers that Scottish Salmon Watch would be filing a welfare complaint. The farmed salmon at the West Strome salmon farm operated

by The Scottish Salmon Company are clearly suffering - this is cruelty and welfare abuse at its very worst. This is population welfare abuse - not just a few fish but every fish we could see was a 'whitehead' or 'meathead' and infested with lice as well as displaying clear welfare problems such as 'death crowns', lesions, open sores, mouth rot, fin damage and tail damage.

Thanks,

(REDACTED)

(REDACTED)