

FOI Backgrounder: Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark

From: Access to Information Enquiries <foi@sepa.org.uk>
Date: Tue, 22 Feb 2022, 18:12
Subject: F0193236 Response
To: salmonfarmingkills@gmail.com <salmonfarmingkills@gmail.com>
Cc: Access to Information Enquiries <foi@sepa.org.uk>

OFFICIAL

Dear Don Staniford

REQUEST FOR INFORMATION – RESPONSE

Thank you for your request. Please see the enclosed response.

If you are not satisfied with the response provided and wish to request a formal review. You have 40 working days from the date of this email to request a formal review from SEPA at: foi@sepa.org.uk

If you are still not satisfied, following the completion of a formal review, you can appeal to the Scottish Information Commissioner. www.itspublicknowledge.info/appeal

Your unique reference number is F0193236. Please quote this in any future contact with us about your request.

Regards

Stephanie

Access to Information team

This PC > Documents > Chemicals > Imidicloprid FOI SEPA Feb 2022 > F0193236 Response

Name	Type	Compressed size	Password p...	Size	Ratio	Date modified
 EIR Response F0193236 FINAL	Microsoft Edge PDF Docu...	326 KB	No	326 KB	0%	22/02/2022 18:06
 Imidacloprid MRL approved in Eur...	Microsoft Edge PDF Docu...	114 KB	No	114 KB	0%	22/02/2022 18:06
 Official Business FW Board questio...	Microsoft Edge PDF Docu...	201 KB	No	201 KB	0%	22/02/2022 18:06
 RE Catch up with Benchmark on Cl...	Microsoft Edge PDF Docu...	319 KB	No	319 KB	0%	22/02/2022 18:06
 RE Project update_R_Redacted	Microsoft Edge PDF Docu...	344 KB	No	344 KB	0%	22/02/2022 18:06
 RE SAIC contact person_R_Redacted	Microsoft Edge PDF Docu...	249 KB	No	249 KB	0%	22/02/2022 18:06
 SEPA Benchmark Discussion_R_Re...	Microsoft Edge PDF Docu...	32 KB	No	32 KB	0%	22/02/2022 18:06
 SEPA ordered by Commissioner to ...	Microsoft Edge PDF Docu...	114 KB	No	114 KB	0%	22/02/2022 18:06
 Substances for SEPA consents FINAL	Microsoft Excel Worksheet	13 KB	No	13 KB	0%	22/02/2022 18:06
 The Guardian Novichok for insects ...	Microsoft Edge PDF Docu...	118 KB	No	118 KB	0%	22/02/2022 18:06

PUBLIC



RESPONSE TO F0193236

Request Timeline

Date	Status
17/04/2021	EIR Request received [statutory deadline 17/05/2021]
22/02/2022	EIR Response issued

Requested Information

Please provide any information on Imidacloprid (BMK08/Ectosan), CleanTreat and Benchmark since 8 June 2020.

Please include emails, reports, risk assessments, modelling results, surveys, photos, letters, Excel data and any other information in relation to Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark.

Please detail any meetings and online phone calls (e.g. Zoom) with Benchmark, SSPO, salmon farming companies, Scottish Government officials, SNH or any other parties in relation to Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark.

Response

We can confirm that we have handled your request under the terms of the Environmental Information (Scotland) Regulations 2004 (EIRs).

We apologise for the delay in providing this response.

SEPA Access to Information Team began working remotely on 17 March 2020 due to COVID-19. In addition, there was continued disruption due to a sophisticated criminal cyber-attack on Christmas Eve 2020 which have significantly affected SEPA's ability to respond to Access to Information enquiries. More information about SEPA's response and service status can be found here: <https://www.sepa.org.uk/about-us/cyber-attack>

Please provide any information on Imidacloprid (BMK08/Ectosan), CleanTreat and Benchmark since 8 June 2020.

Please include emails, reports, risk assessments, modelling results, surveys, photos, letters, Excel data and any other information in relation to Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark.

Following a search of our records, we have attached the following emails relating to imidacloprid/BMK08. The documents released have been redacted for personal data under Regulations 11(1) and 11(2).

Description	
Substances: Provided to SEPA by Institute of Aquaculture – University of Stirling for advice on proposed permitted substances list. These relate to a pre application discussion of CAR/L/1001024.	<ul style="list-style-type: none"> • Substances for SEPA consents
Private Individual: correspondence from a private individual.	<ul style="list-style-type: none"> • Imidacloprid MRL approved in Europe - Scotland env modeller hired by Benchmark R Redacted • SEPA ordered by Commissioner to Disclose by 7 June R Redacted • The Guardian Novichok for insects may be approved for Scottish fish farms R Redacted
SEPA Board Question: An internal response to a SEPA Board question	<ul style="list-style-type: none"> • Official Business FW Board question related media response R Redacted
Benchmark, CleanTreat, SAIC Project: Communication with Benchmark about CleanTreat in relation to a SAIC project to trial of the technology in Scotland to remove the anti-sea lice medicine, azamethiphos, at sites with an existing authorisation to discharge azamethiphos to coastal waters.	<ul style="list-style-type: none"> • RE Catch up with Benchmark on CleanTreatSAIC project R Redacted • RE Project update R Redacted • RE SAIC contact person R Redacted • SEPA Benchmark Discussion R Redacted

We can confirm we have no other emails, reports, risk assessments, modelling results, surveys, photos, letters, Excel data and any other information relating to imidacloprid.

We advise that there are further documents in scope of this request that are publicly available and easily accessible on the SEPA [Disclosure Log](#) which is available on the [SEPA website](#). You can search our Disclosure Log by entering a key search word in the Title box, or a reference number in the Reference box, and clicking on the filter icon 

Ref No.	Date	Related information available SEPA Disclosure Log
F0192621	27/11/20	<p>Finfish - Information on the use of Imidacloprid</p> <p>Please provide information on the use of Imidacloprid (publicly known as Ectosan from December 2017 to November 2019 and then marketed by Benchmark as BMK08) since 1 January 2019. Please include any information that may have been omitted or deemed confidential via previous FOI requests. Please include information on any proposed, actual, illegal, legal, aborted, planned or unknown use of Imidacloprid in Scottish salmon farming. Please consider this a Freedom of Information request under the relevant FOI and Environmental Information regulations.</p>
F0192362	05/10/20	<p>Finfish - Chemical use (BMK08 & Ectosan/ Imidacloprid)</p> <p>Please provide information on the use of Imidacloprid (publicly known as Ectosan from December 2017 to November 2019 and then marketed by Benchmark as BMK08) at the FAI Aquaculture marine laboratory in Ardtoe since October 2013. The FOI request with contextual information is attached here as a PDF and available online here Please therefore provide information including any licences, discharge consents, approvals, trials and any other documents relating to the use of Imidacloprid (Ectosan/BMK08) at Ardtoe since October 2013. Scottish Salmon Watch would like to ascertain if any use of Imidacloprid (Ectosan/BMK08) by Benchmark - via their "10-year" development of CleanTreat at Ardtoe - has been officially approved by the Scottish Government, SEPA, the VMD or another authority.</p>

Ref No.	Date	Related information available SEPA Disclosure Log
F0191964	26/06/20	Finfish - Chemical use (BMK08 & Ectosan/ Imidacloprid) [1] Could you please provide information on any scientific risk assessments of the ecosystem impacts of Imidacloprid (BMK08/Ectosan) in salmon farming? [2] What scientific research has SEPA conducted on the toxicity and environmental impact of Imidacloprid? [3] Could you please share any information you have detailing how Benchmark can magically make Imidacloprid disappear from wastewater effluent discharges? [4] What environmental effects have been considered in relation to trials (whether proposed, aborted, in-progress or completed) in Scotland? [5] What scientific research including ecological risk assessment has been conducted in relation to Imidacloprid remote discharges of effluent water in 'discharge zones'? [6] At what concentration is Imidacloprid being measured down to? [7] Has SEPA, VMD and/or the Scottish Government conducted any modelling of environmental impacts or any ecological risk assessments of Imidacloprid use in salmon farming? [8] Please therefore provide information on any scientific risk assessments of the ecosystem impacts of Imidacloprid (BMK08/Ectosan) in salmon farming since June 2016.
F0191802	18/05/20	Formal Review of F0191735 Information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast/CleanTreat) Formal Review of F0191735 Information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast/CleanTreat)
F0191735	15/04/20	Information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast/CleanTreat) Please provide information on Imidacloprid (BMK08/Ectosan/D10 Aquatic Blast) including discharges and disposals via Benchmark's 'CleanTreat' since 2014. Background details on this FOI request are available online here - and attached as a PDF. Please therefore provide the information requested which may involved re-visiting previous FOI requests. Please consider this a formal request for information via the relevant FOI and Environmental Information regulations. Please provide the information electronically and/or online. Please provide a receipt of this FOI request.

Please detail any meetings and online phone calls (e.g. Zoom) with Benchmark, SSPO, salmon farming companies, Scottish Government officials, SNH or any other parties in relation to Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark.

We have carried out a search and confirm we have no record of any meetings and online phone calls (e.g. Zoom) with Benchmark, SSPO, salmon farming companies, Scottish Government officials, SNH or any other parties in relation to Imidacloprid.

Further information regarding the regulations/ exceptions applied to this information can be found below.

Application of Regulations/Exceptions

Section 39(2)

We have applied the exemption under Section 39(2) of the Freedom of Information (Scotland) Act 2002 as we have determined that the information sought in your request is environmental information. We are therefore handling your request under the terms of the Environmental Information (Scotland) Regulations 2004 (EIRs). In this case the public interest in maintaining this exemption and in dealing with the request in line with the requirements of the EIRs outweighs any public interest in disclosing the information under FOISA.

Regulation 6(1)(b) Publicly available & easily accessible

Where we have advised above that information is publicly available & easily accessible Regulation 6(1)(b) applies, the text of which is reproduced below.

6(1) Where an applicant requests that environmental information be made available in a particular form or format, a Scottish public authority shall comply with that request unless- (b) the information is already publicly available and easily accessible to the applicant in another form or format.

Regulation 9 – Advice and assistance

Regulation 9 – Advice and assistance Where we have issued additional information or advice this is provided in line with SEPA's duty to advise and assist under Regulation 9 of The Environmental Information (Scotland) Regulations 2004.

Regulation 10(4)(a) – Information not held

Where we have advised above that SEPA does not hold this information it is excepted under Regulation 10(4)(a) of the Environmental Information Regulations 2004. The text of which is reproduced below;

(4) A Scottish public authority may refuse to make environmental information available to the extent that:-

(a) it does not hold that information when an applicant's request is received. The exception in regulation 10(4)(a) is subject to the public interest test in regulation 10(1)(b) of the EIRs. As SEPA does not hold the information in question there is no conceivable public interest in requiring that the information be made available.

Regulation 10(4)(e) – Internal communications

We have meeting links as internal communications, therefore they have been excepted under Regulation 10(4)(e) of the EIRs. The text of which is reproduced below.

10(4) A Scottish public authority may refuse to make environmental information available to the extent that (e) the request involves making available internal communications.

The Public Interest Test was carried out in relation to the information to be withheld under Regulation 10(4)(e) of the EIRs. The withheld information consists of links to join meetings which were only intended for use by employees. The public interest in favour of disclosing the information is outweighed by the public interest in favour of maintaining the exemption.

Regulation 11(1) and 11(2) – Personal data

Personal data relating to SEPA staff and private individuals has been redacted from the released documents in accordance with Regulation 11(2) of the EIRs and Data Protection Principles. SEPA has not withheld complete documents which contain such personal data and have released all other information within the document.

[PDF #2: SEPA Board question & related media response dated 26 May 2021](#)

From: SEPA
Mail received time: Wed, 26 May 2021 09:39:42
Sent: 26 May 2021 10:39:42
To: SEPA
Cc: Various people in SEPA
Subject: Official Business FW: Board question & related media response
Importance: Normal
Sensitivity: None

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

I followed up the question asked at the Board on neonicotinoid use in aquaculture with

has confirmed that no neonicotinoids are currently licensed for use and we have no applications pending. Below are the lines we supplied to the recent media enquiry.

"As Scotland's independent environmental regulator, SEPA's Aquaculture Sector Plan outlines our vision for the sector. SEPA has had no pre-application discussions, nor received an application to discharge imidacloprid, either as part of a trial or otherwise, from Benchmark Holdings or any other company.

"Trials of any new medicine that would involve a discharge of residues into the environment would require authorisation, and discharges into the sea from land, fish pens or wellboats require a permit from SEPA.

Note

- SEPA's role, as Scotland's independent environmental regulator, is to ensure that any proposed discharges to coastal waters of medicine residues will comply with environmental standards.
- The time we take to determine any application depends on the quality of the information supplied by the applicant and the time needed to properly take account of this information and the information provided in the consultation process.
- If an application is made to discharge a new medicine we require, among other things, the applicant to provide the scientific evidence necessary to identify the no effect concentration for that medicine in the environment, and information on how they will ensure that this concentration is met. The application will then be subject to public consultation prior to us determining whether to grant or refuse authorisation

[PDF #3: Benchmark emails to SEPA re. SAIC project in October 2021](#)

From: [REDACTED]@bmkanimalhealth.com>

Sent: 13 October 2021 12:20

To: [REDACTED]@SEPA.org.uk>; [REDACTED]@sepa.org.uk>; [REDACTED]@sepa.org.uk>; [REDACTED]@gov.scot

Subject: Catch up with Benchmark on CleanTreat/SAIC project

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Guys,

I hope you are all well.

I was hoping to schedule in a project catch up with you all over the next week or 2. Could you please let me know your availability and I will get something set up?

Kind Regards,

[REDACTED]



Benchmark®
Animal Health

+44 (0) 131 445 8669

[REDACTED]@bmkanimalhealth.com
www.bmkanimalhealth.com

1 Pioneer Building, Edinburgh Technopole, Milton Bridge, Near Penicuik, EH26 0GB

From: [REDACTED]@sepa.org.uk>

Sent: 13 October 2021 13:05

To: [REDACTED]@bmkanimalhealth.com>

Cc: [REDACTED]@SEPA.org.uk>; [REDACTED]@sepa.org.uk>

Subject: RE: Catch up with Benchmark on CleanTreat/SAIC project

OFFICIAL

Hi [REDACTED]

A catch-up would be very helpful.

[REDACTED] We could manage a meeting at 12:00 tomorrow. Alternatively, [REDACTED] and I could make a meeting at 16:00 on next Monday or Tuesday.

[REDACTED] diary is clear after 15:00 on Wednesday 27th.

Let me know if any of these options suit

Best wishes

[REDACTED]

[REDACTED]

[REDACTED]

Scottish Environment Protection Agency [REDACTED]

From: Benchmark Animal Health [REDACTED]

Mail received time: Thu, 14 Oct 2021 13:02:33

Sent: 14 October 2021 14:02:33

To: SEPA [REDACTED]

Cc: SEPA [REDACTED]

Subject: RE: Catch up with Benchmark on CleanTreat/SAIC project

Importance: Normal

Sensitivity: None

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED]

Apologies on the delay. Today is obviously out the window as the slot is gone (sorry). It would have perhaps been too soon to rally my team anyway. I have an internal catch up on this project at 3.30 where I will suggest Monday or Tuesday at 4pm. I will let you know later today.

When are you back [REDACTED]? Just thinking of options in case my team struggle for early next week.

Thanks,

[REDACTED]



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Animal Health

+44 (0) 131 445 8669

[REDACTED]@bmkanimalhealth.com
www.bmkanimalhealth.com

[PDF #4: SAIC emails to SEPA in December 2021](#)

From: [REDACTED]@sustainableaquaculture.com>
Sent: 16 November 2021 15:10
To: [REDACTED]@sepa.org.uk>; [REDACTED]@SEPA.org.uk>
Cc: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sustainableaquaculture.com>
Subject: Project update

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear [REDACTED]

I hope this finds you and the team well.

Would appreciate a quick catch-up on SAIC's funded Cleantreat project and technology, which Benchmark are developing.

It would be beneficial to understand SEPA's position in terms of regulation of the equipment's use following this instrument development and testing phase. There is interest from the sector in utilising the technology in the future to best manage chemical lice treatments, and who wish to better understand the practical detail in the potential steps to proceed with this technology.

Please let me know if you would be available for a chat in the next week.

Best wishes,

[REDACTED]

[REDACTED]

[REDACTED]



01786 278302
[REDACTED]
[sustainableaquaculture.com](https://www.sustainableaquaculture.com)



Keep up-to-date with news and events 

From: [REDACTED]@SEPA.org.uk>
Sent: 16 November 2021 15:14
To: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sepa.org.uk>
Cc: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sustainableaquaculture.com>
Subject: RE: Project update

CAUTION: This email originated from outside University of Stirling. Do not follow links or open attachments if you doubt the authenticity of the sender or the content.

OFFICIAL

Hi [REDACTED]

Happy to find time to discuss. I will check calendars from our end and provide some suggested dates.

Thanks

[REDACTED]

From: [REDACTED]@SEPA.org.uk>
Sent: 30 November 2021 08:27
To: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sepa.org.uk>
Cc: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sustainableaquaculture.com>
Subject: RE: Project update

CAUTION: This email originated from outside University of Stirling. Do not follow links or open attachments if you doubt the authenticity of the sender or the content.

OFFICIAL

Hi [REDACTED]

I am catching up [REDACTED] Would Friday suit? At the moment it looks like [REDACTED] and I could manage either 10:00 – 11:00 or 12:30 – 13:30?

Thanks

[REDACTED]

From: [REDACTED]@sustainableaquaculture.com>
Sent: 03 December 2021 09:16
To: [REDACTED]@SEPA.org.uk>; [REDACTED]@sepa.org.uk>
Cc: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sustainableaquaculture.com>
Subject: RE: Project update

OFFICIAL

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Apologies for delay in replying [REDACTED] just catching up with emails. [REDACTED] wont be able to make a call today [REDACTED] diary is tight for time and [REDACTED] is in Oban this morning. Would you be free next Thursday 8th anytime between 230-430?

Look forward to hearing from you

[REDACTED]

[REDACTED]

[REDACTED]



 sustainableaquaculture.com



Keep up-to-date with news and events 

The Sustainable Aquaculture Innovation Centre is hosted by the University of Stirling and based at Unit 19, Scion House, Stirling University Innovation Park, Stirling FK9 4NF.



From: [REDACTED]@SEPA.org.uk>
Sent: 03 December 2021 09:19
To: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sepa.org.uk>
Cc: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sustainableaquaculture.com>
Subject: RE: Project update

CAUTION: This email originated from outside University of Stirling. Do not follow links or open attachments if you doubt the authenticity of the sender or the content.

OFFICIAL

Hi [REDACTED]

Hope you are [REDACTED] yes looks like we could do a short call 16:00 – 16:30, if that works?

Thanks

[REDACTED]

From: [REDACTED]@SEPA.org.uk>
Sent: 06 December 2021 09:16
To: [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sustainableaquaculture.com>; [REDACTED]@sepa.org.uk>
Cc: [REDACTED]@sustainableaquaculture.com>
Subject: RE: Project update

CAUTION: This email originated from outside University of Stirling. Do not follow links or open attachments if you doubt the authenticity of the sender or the content.

OFFICIAL

Hi,

Yes, [REDACTED] and I could do 13:30 – 14:00 on Thursday.

Thanks

[REDACTED]

From: Sustainable Aquaculture
Sent: 06 December 2021 09:43:43
To: SEPA Sustainable Aquaculture SEPA
Cc: Sustainable Aquaculture
Subject: RE: Project update
Importance: Normal
Sensitivity: None

OFFICIAL

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Many thanks indeed, will change the invite now.

Speak soon, have a good day

█

[PDF#5: SAIC email asking SEPA's position on CleanTreat in October 2021](#)

From: [REDACTED]@bmkanimalhealth.com>
Sent: 28 October 2021 10:36
To: [REDACTED]@sepa.org.uk>
Subject: SAIC contact person

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [REDACTED]

I hope you are well.

SAIC have reached out to me asking if I can give them an update around SEPA's position regarding the Cleantreat project, specifically how the technology and discharge might be regulated.

I am able to provide them feedback based on our conversations however, I feel it would be right for SEPA to provide their own statement to avoid confusion or potential miscommunication.

Is there someone from your end that I can point our SAIC contact [REDACTED] towards?

Thanks,

[REDACTED]



Benchmark®
Animal Health

+44 (0) 131 445 8669

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

www.bmkanimalhealth.com

1 Pioneer Building, Edinburgh Technopole, Milton Bridge, Near Penicuik, EH26 0GB

From: SEPA [REDACTED]
Sent: 05 November 2021 16:35:18
To: BMK Animal Health [REDACTED]
Cc: SEPA [REDACTED]
Subject: RE: SAIC contact person
Importance: Normal
Sensitivity: None

Hi [REDACTED]

As discussed, please see summary of the regulatory requirements applying where the discharge is made from a second vessel at the site rather than from the wellboat in which the fish are treated:

- a. the permit holder will need to apply for a simple, administrative variation. The variation will amend the permit to provide for the discharge to be made from any vessel at the site rather than restricting it (as at present) to being made from the wellboat.
- b. All other permit conditions will remain unchanged and must be complied with as normal.

We expect to begin the process of transferring all farm permits onto a new, simpler permit template before the end of 2021/22. If the trial is carried out after this transfer, the application for variation referred to in (a) above will not be required.

We are expected to determine applications for variation within a maximum of 4 months. Simple administrative variations can be processed very quickly. We would be happy to liaise with you and the operators concerned to ensure we understand timings and can plan accordingly.

Best regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Scottish Environment Protection Agency [REDACTED]

PDF #6: SEPA & Benchmark Zoom call June 2021

Subject: SEPA & Benchmark Discussion
Location: 10(4)(e)

Start: Mon 07/06/2021 13:00
End: Mon 07/06/2021 14:00
Show Time As: Tentative

Recurrence: (none)

Organizer: BMK Animal Health

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.
Hi all,

Following on from our call last month I would like for us to catch on project specifics on the SAIC project.

from our team will be involved moving forward and will provide an introduction when we meet.

Please do let me know if this time is not suitable we can shift things around if need be.

Thanks,

is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

10(4)(e)

[PDF #7: Guardian article on 'Novichok for insects'](#)

From: 11(1) - Private individual
Mail received time: Thu, 27 May 2021 08:31:56
Sent: 27 May 2021 09:31:56
To: 11(2) - SEPA Staff
Subject: The Guardian: "Novichok for insects' may be approved for Scottish fish farms"
Importance: Normal
Sensitivity: None

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

<https://www.theguardian.com/environment/2021/may/27/novichok-for-insects-may-be-approved-for-scottish-fish-farms>

Tweet via: 11(1)

Has SEPA received an application for the use of 'Novichok for insects' on salmon farming in Scotland?

When did SEPA first know that Ectosan/BMK08 was Imidacloprid?

Please consider this an official request for information if you don't want to respond informally.

For example, you could reply via Twitter.

Best fishes,

11(1)

[Excel Spreadsheet: Substances for SEPA consents FINAL](#)

Purpose	Class if applicable e.g. pesticides	Product name if applicable	Active Ingredient if applicable	Method of use
Pesticide	neonicotinoids	BMK08	imidacloprid	In feed

FOI request filed by Scottish Salmon Watch in April 2021:

From: Don Staniford <salmonfarmingkills@gmail.com>
Date: Sat, Apr 17, 2021 at 7:45 AM
Subject: FOI re. Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark since 8 June 2020
To: AccesstoInformation <foi@sepa.org.uk>
Cc: Pollard, Peter <peter.pollard@sepa.org.uk>, Ahearn, Terry <terry.ahearn@sepa.org.uk>, Media <publicrelations@sepa.org.uk>, Mackinnon, Alison <Alison.Mackinnon@sepa.org.uk>, Sinclair, Douglas <douglas.sinclair@sepa.org.uk>

Please provide any information on Imidacloprid (BMK08/Ectosan), CleanTreat and Benchmark since 8 June 2020.

Please include emails, reports, risk assessments, modelling results, surveys, photos, letters, Excel data and any other information in relation to Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark.

Please detail any meetings and online phone calls (e.g. Zoom) with Benchmark, SSPO, salmon farming companies, Scottish Government officials, SNH or any other parties in relation to Imidacloprid (BMK08/Ectosan), CleanTreat & Benchmark.

Scottish Salmon Watch was alarmed to read in the trade press yesterday that Benchmark have appointed an environmental modeller (Meghan Rochford) - formerly employed by Grieg Seafood, The Scottish Salmon Company and Marine Harvest/Mowi - to gear up for the use of Imidacloprid (BMK08/Ectosan) in salmon farming in Scotland.

Details via: [Warning: Neonicotinoid Imidacloprid Use in Salmon Farming "Clears Another Hurdle" With European MRL](#)

SEPA stated in an email from Peter Pollard dated 26 June 2020:

"SEPA is not planning to commission and publish a scientific dossier on the environmental impacts of imidacloprid..... In the case of imidacloprid, there are currently no established coastal water environmental standards to review. There are also no authorised discharges into coastal waters. Before we would consider authorising any discharges of imidacloprid, we would require the applicant to provide the necessary data to identify a suitable environmental standard in the form of a predicted no effect concentration. It is the responsibility of the applicant to provide the scientific information for this purpose"

A FOI reply dated 26 June 2020 included:

[2] What scientific research has SEPA conducted on the toxicity and environmental impact of Imidacloprid?

We confirm that SEPA has not conducted any research on toxicity and environmental impact of Imidacloprid in relation to salmon farming.

[3] Could you please share any information you have detailing how Benchmark can magically make Imidacloprid disappear from wastewater effluent discharges?

SEPA does not hold any further information relating to discharges via Benchmark's 'CleanTreat' from 2014 to the date of receipt of this request 8 June 2020.

And:

[7] Has SEPA, VMD and/or the Scottish Government conducted any modelling of environmental impacts or any ecological risk assessments of Imidacloprid use in salmon farming?

SEPA have not conducted any modelling of environmental impacts or any ecological risk assessments of Imidacloprid use in salmon farming.

As background reference see [online here](#)

Further background via [Letter on Imidacloprid to Terry A'Hearn, Chief Executive of SEPA](#) (17 March 2020) and [Please Come Clean on BMK08!](#)

Scottish Salmon Watch was hoping to wait to file this FOI request until the ruling from the Scottish Information Commissioner (as [filed in February 2020](#)) but it seems that if we wait any longer then Imidacloprid will already be used commercially at salmon farms across Scotland.

Details via <https://twitter.com/TheGAAIA/status/1383310409952686091>

Scottish Salmon Watch is of the view that [Imidacloprid has already been used illegally and in secret at Benchmark's Ardtoe Marine Laboratory](#) and wishes to stop any commercial use in Scotland.

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

Please provide the information electronically.

Please provide a receipt.

Thanks,

Don Staniford

Director, Scottish Salmon Watch

Addendum:

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

Date: Fri, Mar 11, 2022 at 1:03 PM

Subject: Re: F0193236 Response

To: Access to Information Enquiries <foi@sepa.org.uk>

Re:

Description	
Substances: Provided to SEPA by Institute of Aquaculture – University of Stirling for advice on proposed permitted substances list. These relate to a pre application discussion of CAR/L/1001024.	<ul style="list-style-type: none"><li data-bbox="764 323 1175 359">• <u>Substances for SEPA consents</u>

Surely there is an email from the Institute of Aquaculture or other details which provide more context to the Excel spreadsheet 'Substances for SEPA consents'?

As a stand alone file, it is difficult to fully interpret it.

Thanks,

Don