

**Media Backgrounder: [Stinky Scottish Salmon](#)
– [FOI lifts lid on illegal disposal of diseased fish in North Uist](#) (December 2022)**



A [FOI disclosure by Comhairle nan Eilean Siar \(Western Isles Council\)](#) on 14 December 2022 details complaints filed in October 2022:



Comhairle nan Eilean Siar
Freedom of Information

2022102127000047

- Complaint received on 3/10/2022.

“I am writing to complain about the ongoing stench affecting Knockintorran and originating from the fish processing plant on the local machair. We were advised this plant would not operate until new equipment was in situ to stop the stench. This is not the case as the factory is operational and we are regularly unable to open windows and doors for the stench of rotten fish blowing on the wind. This has been going on for years and is obviously not resolved. The issue continues to affect residents on the west side of Uist and must have health implications for the local population as well as being detrimental to our ability to live normal and healthy outdoor lives. The factory operates day and night over 7 days so there is no let up from this intrusion. Please can you advise why this is being allowed to continue and what is being done about resolving this ongoing environmental health issue for local residents?”

- Complaint received on the 19 October 2022

On Sunday 16 October my husband and I took a walk on North Uist. We parked on the coast, just past the Tractor Shed Camping Huts & Bunkhouse (off the A865). As soon as we got out of the car there we could smell something foul, clearly death and decay, and it became worse as we walked along the beach. We eventually realised the smell was coming from the Whiteshore Cockles processing facility. By the time we were alongside it the stench was almost unbearable.

On returning home I found various articles on the Web, saying that the practice of burying dead salmon in the dunes and covering them with seaweed has been illegal since 2016, but Whiteshore Cockles were continuing to do this. There was an expectation that they would cease by March 2022. However, they are obviously still continuing to do it - judging by the recent tyre marks in the sand, even on a Sunday. Can you tell me if you are content to allow the foul smells to continue, or when you expect them to cease. We will not visit that beach again until the stench has gone, and I feel very sorry for the residents and holiday-makers in the Paible area"



Comhairle nan Eilean Siar
Freedom of Information

The CneS response was :

"Thank you for raising your concerns. We are aware of the issues with the site and are somewhat restricted in any action we can take as the Scottish Government

granted its authority to allow the burial of fish morts to continue, on this site, on condition that burial would end when a fish waste processing facility, planned for the site was granted a PPC permit from SEPA.

This derogation prevents the Comhairle considering the activities of the site under animal by-product regulations and restricts its ability to investigate smell complaints associated with the activity.

If you have any queries regarding the derogation, then they are best directed to the Scottish Government (Animal Health and Welfare Division). "

Both complaints were copied to the Scottish Government.

\$camon \$cotland has received repeated complaints vs Whiteshore Cockles including:

From:
Date: Fri, Oct 21, 2022 at 9:28 AM
Subject: Re: Still stinky?
To: Don Staniford <salmonfarmingkills@gmail.com>

We hear via a worker that there were 80-90 % morts at the farms and dumped somewhere around last week or the week before at Whiteshore. We could smell it. That high a mort rate should be hard to believe and it's very sad that it's not. If it was a cattle farmer he would be in jail!

From:
Date: Fri, Sep 16, 2022 at 6:28 PM
Subject: A message from your Scottish Scamon contact form.
To: <salmonfarmingkills@gmail.com>

You mentioned that Whiteshore Cockles had lost their license. They are still in business as far as I can see. They are still burying salmon in North Uist this week. Please don't publish my name.



A FOI disclosure by the Scottish Government (17 October 2022) on Whiteshore Cockles included:

[Email from \[name redacted but understood to be Angus MacDonald of Whiteshore Cockles\] to the Scottish Government \[name redacted\] dated 25 March 2022:](#)

After two and a half years and countless consultants our Part A PPC application was submitted to SEPA yesterday.

The application has hundreds of pages of information attached to it and if you want a copy please let me know.

If you can exert any pressure on SEPA to process the application asap I would be obliged as we are in the final stages of preparing / commissioning the equipment and will be ready for operation once the permit is granted.

i am sure we will all be glad once the new system is in full flow.

[Email dated 23 February 2022](#) [name redacted] alluding to mortality data collected by Comhairle nan Eilean Siar (Western Isles Council) being “subject to FOI”:

2. and 10. I understand why the type of information described is being requested, I predict that it will be subject to FOI for the Comhairlie as the data will be held by them for the first time.

[Email dated 17 November 2021 from the Consumer & Environmental Services Manager at Comhairle nan Eilean Siar \(Western Isles Council\)](#) [named redacted]:

As you know the main reason we have been pushing for the controls and conditions on the operation is the level of smell emanating from the site rather than from ABP controls. This is causing significant impact on the neighbouring area and can be detected from a large distance.

The Animal Health Officer was at the site on 1st November and although the site appeared relatively tidy there were approximately 11 bunded pits “open” in that they were covered in seaweed, which does little to prevent odour escape. The pits can't be covered with sand as it sinks into the liquid and would cause overflow. The operators have to wait for the waste to solidify enough/drain before properly covering and the pits will continue to emit smell until they can be fully covered. This is not in compliance with their existing method statement.

My understanding was that the site was allowed to continue burying waste to ensure that there was a local solution for routine morts and to ensure that staff could be employed until the new plant was up and running; however, there are no restrictions on the quantities they are taking.

There appears to have been significant quantities disposed of over the last few weeks and appears to be ongoing due to fish farm events/incidents, which may explain the 11 pits. The quantities involved in “event” mortalities again brings the site's capacity into question and increases the level and duration of odours. It is likely that some of these “open” pits will not be covered properly for months. This aerial photo, which appears to be relatively recent, gives an indication of some of the pits and limited land available. <https://www.google.co.uk/maps/@57.5696889,-7.4600288,490m/data=!3m1!1e3>.

We asked Whiteshores for details of what has been buried over the last period. The figures they supplied showed over 9800 tonnes buried in the last 16 months. Their method statement says the site has a capacity to hold 40,000 tonnes. These figures indicate that they have utilised nearly a quarter of the site's capacity in 16 months. If these figures are representative of previous years, even with natural breakdown, I would seriously question what capacity, if any, the site has remaining. Also for context – assuming a 4 metre pit is achievable and 1m³ per ton – to bury October's waste (~1160 m³) would need the equivalent of a 17m x 17m pit.

We agreed to monitor the site using the proposed conditions below and based on the derogation ending on 31 March 2022. Given this date is now unlikely and they can't effectively comply with the main conditions that could limit odours I honestly don't see any real point in arranging monitoring as it will do little to mitigate the smells. Also based on the current method of disposal there are likely to be open pits well after the derogation end date.

[redacted] said the options are to extend the derogation to 31/3/23 or until the PPC permit is in place, whichever is the earlier, or they have to find another treatment route in the meantime. Given the ongoing concerns regarding capacity and odour, I don't see how we can support extending the derogation.

A FOI request filed in September 2022 with the Scottish Environment Protection Agency has still not received a reply.

Read more via:

[Stinky Scottish Salmon: FOI reveals "the stench of rotten fish blowing on the wind....something foul, clearly death and decay"!](#)

[Closing the Net on Diseased Scottish Salmon - Whithore Cocks Finally Dumped in March!](#)

[The 'illegal' dumping of dead fish in Hebridean beauty spot set to end](#)

[FOI disclosure on Whithore Cocks by the Scottish Government \(202100254831\) on 8 December 2021](#)

[The Times: "Tougher curbs for island salmon graveyard in Outer Hebrides"](#)

[FOI disclosure on Whithore Cocks by the Scottish Government in August 2021](#)

[Exposed: 'Legal' Salmon Dump in North Uist Caught Importing Diseased Fish From the Mainland \(& they've still not applied to SEPA for a pollution permit\)!](#)

[Taking the Fish - Illegal Salmon Dump Caught Taking Diseased Fish from the Mainland Despite 'Derogation'!](#)

[Scottish Government 'exploring strategies' for mort burial site](#)

[P&J: "Lives of Western Isles residents 'severely hampered by rotting fish dump'"](#)

[The Times: "Fish graveyard 'severely hampers' life for islanders, officials claim"](#)

[FOI Lifts Lid on the Stench of Scottish Salmon: Government Legal Department Target Illegal Dumping of Diseased Salmon](#)

[Appeal to Scottish Information Commissioner re. FOI refusal by Western Isles Council on Whithore Cocks](#)

[Letter to Scottish Ministers on Illegal Dumping of Diseased Scottish Salmon in North Uist](#)

[Daily Mail: "Dumped into the dunes....thousands of rotten, disease ridden salmon"](#)

[Independent: "Scottish islanders raise a stink over vast salmon graveyard"](#)

[Video Exposes Mass Graves of Millions of Diseased Scottish Salmon](#)

[The Times: "Islanders raise a stink over vast salmon graveyard"](#)

[Sunday National: "The Millions of Dead Salmon Dumped, Burnt or Destroyed"](#)

[Revealed: Burned, Buried & Ensiled Scottish Salmon](#)

[Media Backgrounder: Mort Disposal of Scottish Farmed Salmon - Ewan Kennedy - The €10 Million Mort Man](#)

[European Commission complaint over dead fish dumping forces rule change](#)

[Where have all the dead fish gone?](#)

[Fears raised by salmon dump](#)

[Diseased fish dumping continues](#)

FOI Dossier on Whiteshore Cockles (October 2022)

Freedom of Information Disclosure by the Scottish Government on 17 October 2022

Disclosed documents:

[FOI reply letter from the Scottish Government dated 17 October 2022](#) (misdated 2021)

[Annex B: Emails \(54 pages\)](#)

[Annex 1: Minutes of Scottish Government Task & Finish Group Meeting 13 December 2021](#)

[Annex 2: Method Statement for Whiteshore Cockles](#)

[Annex 3: Undated & unattributed media statement](#) (letter to Stornoway Gazette in April 2022 from Angus MacDonald of Whiteshore Cockles)

[Annex 4: SEPA letter to Whiteshore Cockles dated 17 January 2022 re. PPC permit](#)



Annex B: [In chronological order – latest first]

From: [redacted]
Sent: 12 May 2022 15:13
To: [redacted]
Subject: RE: OFFICIAL SENSITIVE: Regulatory position statement for Whiteshore boiler UPDATE

Dear All,

I am just off the phone with [redacted].

Cat.1 was proposed as they know the calorific value of cat.1 MBM. No one burns cat.3, so its calorific value is unknown.

They'd be willing to consider using cat.3 PAP to commission the boiler if we agreed that only registration would be required (so no storage approval). This would allow them to save time on the approval procedures. The funds for the approval fee would then be used to purchase the cat.3.

We haven't really discussed this, but is this something that you'd be willing to consider? Registration only to burn cat.3 PAP? Could I have your thoughts please?

[redacted] will come up with a written SOP for storing the PAP on site and its "Use register". All material would be used during the commissioning or [redacted] offered that he could take it back, if preferred (I said we would rather that it was all used).

[redacted] is now to speak with [redacted]. They will try to find out what would be the calorific value of the cat 3 PAP as it might be that they would require more than 10-15 tonnes. They will also need to seek SEPA acceptance to burn cat 3 and not cat 1.

I am told he has never been asked for a temporary approval under ABPR to run boiler commissioning trials.

When Whiteshore apply for approval of their method 4 cat 2 rendering site, they will start up the boiler with cat.2 MBM obtained during its commissioning.

Best wishes,

[redacted]

Veterinary Advisor – Field Delivery Scotland

Animal and Plant Health Agency (APHA)

Telephone: [redacted] | Mobile: [redacted] | Email: [redacted]

Website: www.gov.uk/apha | Twitter: @APHAgovuk | Facebook: aphagov

Address: c/p APHA Galashiels Field Services, Cotgreen Road, Tweedbank, Galashiels, TD1 3SG

From: [redacted]
Sent: 10 May 2022 17:00
To: [redacted]
Cc: [redacted]
Subject: RE: OFFICIAL SENISITIVE: Regulatory position statement for Whiteshore boiler

Hi [redacted],

I believe the approval as a storage plant under ABPR would not be legally required in this case.

It is only to burn the MBM/use it as fuel. Normally, they would only require WID approval for such activity (similar to power stations). My understanding is that they need to commission the boiler prior to obtaining the WID approval.

Moreover, the approval would be very short lived as it is not the intention of Whiteshore at this stage to continue using Category 1 MBM as a feedstock. It is their intention to feed the biomass boiler with cat. 2 fish protein from their process when it has been commissioned and running. Whiteshore would receive only one consignment of 10 tote bags of cat.1 MBM from Dundas (approx. 10-15 tonnes). They do not have a clear answer on the rate of usage during the commissioning trials of the biomass boiler as by their very nature that is dependant in a number of circumstances. However, they estimate that it would be burnt within 2-4 days during the commissioning trial.

The operator is asking if the trails could occur concurrently with the application for the store approval if SG insisted on the approval requirement.

Please, let me know your thoughts.

Best wishes,

[redacted]

Veterinary Advisor – Field Delivery Scotland

Animal and Plant Health Agency (APHA)

Telephone: [redacted] | Mobile:[redacted] | Email: [redacted]

Website: www.gov.uk/apha | Twitter: @APHAgovuk | Facebook: aphagov

Address: c/p APHA Galashiels Field Services, Cotgreen Road, Tweedbank, Galashiels, TD1 3SG

From: [redacted]
Sent: 10 May 2022 14:49
To: [redacted]
Cc: [redacted]>
Subject: RE: OFFICIAL SENISITIVE: Regulatory position statement for Whiteshore boiler

Hi [redacted],

To follow up with an issue Whiteshore will encounter, they will require an ABP storage approval to store the Cat 1 MBM onsite before it is used in the biomass boiler.

Regards

[redacted]

[redacted]

Disease Prevention
Animal Health and Welfare Division (P Spur)
Directorate for Agriculture & Rural Economy, Scottish Government
Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD

I am now working from home Monday to Friday, 7 am – 3 pm. I have full access to emails and this is the best way to contact me.

Tel: [redacted]
Fax: [redacted]



Scottish Government
Riaghaltas na h-Alba
gov.scot

From: [redacted]
Sent: 10 May 2022 14:37
To: [redacted]
Cc: [redacted]
Subject: RE: OFFICIAL SENISITIVE: Regulatory position statement for Whiteshore boiler

Thanks [redacted],

I'm unaware of any registration submitted by Whiteshore, but it may come in over the next few days.

From: [redacted]
Sent: 10 May 2022 14:29
To: [redacted]
Subject: OFFICIAL SENISITIVE: Regulatory position statement for Whiteshore boiler

Dear Both,

Please, be advised that Whiteshore Cockles Limited are interested in receiving a permission to burn cat.1 MBM in their biomass boiler. The plan is that in the future the boiler will be fed with cat 2 MBM obtained during method 4 processing of the fish mortalities in their own cat.2 rendering plant (cat.2 fish oil will be sold for biodiesel production). Currently they do not have cat.2 MBM therefore they approached Dundas is they could source one single consignment of 10 tonnes of cat.1 MBM from them. This is to allow Whiteshore Cockles to commission the boiler.

I advised [redacted] of Dundas Chemical, that the recipient of cat.1 MBM should either be approved or registered under ABP Regulations.

My understanding is that Whiteshore Cokles have already approached you for registration to operate as cat.1 transporter and also to use the cat.1 MBM as a fuel.

Please, find attached communication from SEPA on this matter.

From: [redacted]
Sent: 10 May 2022 13:10
To: [redacted]
Cc: [redacted]
Subject: Fwd: Regulatory position statement for Whiteshore boiler



220117 Whiteshore
Cockles Boiler RHI tes: **annex 4**

[redacted],
Further to our discussions yesterday regarding the above, please see below and attached letter from Sepa which provides the comfort that we talked about. The registration of Whiteshore is being processed currently and it is our intention to supply the product when that is complete. We will of course keep [redacted] in the picture. Many thanks for advice.
Best regards
[redacted]

From: [redacted]
Sent: Tuesday, May 10, 2022 11:49:58 AM
To: [redacted]
Subject: Fwd: Regulatory position statement for Whiteshore boiler

Good morning [redacted]

Please see attached letter from SEPA which gave is permission to use the MBM etc.

I will submit the registration document today and we will use DRMacLeod Ltd for haulage who are already registered.

[redacted].

----- Forwarded message -----

From: [redacted]
Date: 10 May 2022, 11:30 +0100
To: [redacted]
Subject: Regulatory position statement for Whiteshore boiler
Hi [redacted],

Attached is the regulatory position statement for the operation of the boiler for the RHI and commissioning testing.
All MBM will be used in the testing and none will be left over or held for a later date.

Best regards

[redacted]

[redacted]

From: [redacted]
Sent: 14 April 2022 09:50
To: [redacted]
Subject: Newspaper article



Stornoway Gazette
finished article.pdf (annex 3)

Good morning [redacted], [redacted],

Please find attached an article that I have written which will appear in the Stornoway Gazette today.

It has been a long journey but we see a light at the end of the tunnel now.

Thank you for your continued support.

Best regards

[redacted]

From: [redacted]
Sent: 25 March 2022 13:46
To: [redacted]
Subject: Whiteshore Cockles

[redacted], [redacted],

Hope all is well with you both.

After two and a half years and countless consultants our Part A PPC application was submitted to SEPA yesterday.

The application has hundreds of pages of information attached to it and if you want a copy please let me know.

If you can exert any pressure on SEPA to process the application asap I would be obliged as we are in the final stages of preparing / commissioning the equipment and will be ready for operation once the permit is granted.

i am sure we will all be glad once the new system is in full flow.

Any queries please do not hesitate to get in touch.

[redacted]

From: [redacted]

Sent: 23 February 2022 22:32

To: [redacted]

Cc: [redacted]

Subject: RE: Animal health - animal by-products - derogation for Whiteshore
Cockles - draft text - SGLD to policy - legal rural

Hi [redacted], those comment boxes were getting messy so I have added in comments below in response to points raised. If you need me to transfer them into the do, just let me know.

9. Only fish waste from fish farms operated by authorised aquaculture production businesses within Comhairle nan Eilean Siar's planning authority area may be buried on site.

'Aquaculture Production Business' is the term given to those farms which are authorised to carry out aquaculture production by the competent authority and the term used in the Aquatic Animal Health (Scotland) Regulations. I would suggest using it instead of 'fish farming'

I don't have strong opinion on how the spatial area is described – the Comhairle describe itself as the 'local authority'. [redacted] made the point before that the APBs could be considered in terms of where the shore bases were as opposed to trying to define a marine area. The point to capture is that the use of Whiteshore is only to support those who had no alternative other than taking waste off the island(s) which wasn't always possible / feasible.

10. Before moving any consignment of fish waste to the site for disposal arising from a mortality event, notification of the approximate weight of fish waste in the consignment, its geographical source and a plan for its disposal must be given to Comhairle nan Eilean Siar and the Scottish Government by [insert means of communication e.g. "by sending emails to eh@cne-siar.gov.uk and XXX@gov.scot"] at least [48 hours] before the consignment is delivered.

'Mortality event' is a term we use loosely to convey an incident e.g. a disease outbreak, a seal attack, an algal bloom etc which has caused multiple fish (of an undefined number) to die, but it has no real meaning. We don't agree that a reference should be made to a 'mortality event' in the conditions – 'fish mortalities' is a better term to use. Or is the term necessary to reference in the condition at all - could we simply just say 'before moving any consignment of fish waste to the site for disposal, notification'. There is some discussion about in the comment boxes about how to define 'event' in terms of percentage or weight, but I'm not clear why this is relevant – why would we distinguish between waste of one weight or % than another, and what are the companies to

do with the waste of other weights of percentages. I'm happy to help further if I can better understand, so happy to discuss.

2. and 10. I understand why the type of information described is being requested, I predict that it will be subject to FOI for the Comhairlie as the data will be held by them for the first time.

[redacted]

From: [redacted]

Sent: 23 February 2022 11:21

To: [redacted]

Cc: [redacted]

Subject: Re: Animal health - animal by-products - derogation for Whiteshore Cockles - draft text - SGLD to policy - legal rural

Hi [redacted],

Main items to look for:

1)description of cleaning step

2)use of a DEFRA approved disinfectant at general order concentration

[redacted]

From: [redacted]

Sent: 23 February 2022 14:12

To: [redacted]

Subject: RE: Animal health - animal by-products - derogation for Whiteshore Cockles - draft text - SGLD to policy - legal rural

I don't think so, but will address in my comments

[redacted]Fish Health

Inspectorate Group Leader

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

Tel: [redacted]

Mobile: [redacted]

From: [redacted]

Sent: 22 February 2022 12:35

To: [redacted]

Cc: [redacted]

Subject: RE: Animal health - animal by-products - derogation for Whiteshore Cockles - draft text - SGLD to policy - legal rural

[redacted],

Quick question. Does condition 10 as it stands, make reporting of mortalities mandatory for the farms which use Whiteshore Cockles for disposal?

Kind regards

[redacted]



[redacted]

Aquaculture Health & Welfare Policy Adviser

[Marine Scotland](#): Aquaculture and Recreational Fisheries

Scottish Government

Tel: [redacted]

E-mail: [redacted]

On 22 Feb 2022, at 12:28, [redacted] wrote:

Hi [redacted] and [redacted]

We are trying to finalise the fish waste burial conditions for Whiteshore Cockles. Would you be able to look at condition 8 and provide some lines for what to inspect for disinfection procedures?

Thanks

[redacted]

[redacted]

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division |
Directorate for Agriculture & Rural Economy | Scottish Government
Tel. [redacted] | Mob: [redacted]*

[redacted]

From: [redacted]

Sent: 22 February 2022 12:25

To: [redacted]

Cc: [redacted]

Subject: FW: Animal health - animal by-products - derogation for Whiteshore Cockles - draft text - SGLD to policy - legal rural

Hi [redacted], [redacted] and [redacted]

We are finalising the fish waste burial conditions for Whiteshore Cockles. The attached letter has comments from SGLD and ABP policy. Would you be able to take a look at conditions 9 and 10? These need to be clarified by MS/FHI.

Thanks

[redacted]

[redacted]

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division |
Directorate for Agriculture & Rural Economy | Scottish Government
Tel. [redacted] | Mob: [redacted]*

From: [redacted]
Sent: 18 January 2022 16:37
To: [redacted]
Cc: [redacted]
Subject: RE: Whiteshore

Hi [redacted]

No hurry as long as we know things are being extended till the PPC is issued as the conditions are being followed as discussed.

Very quiet now anyway and our consultant seems to be having almost daily contact with SEPA which is good.

Regards

[redacted]

On 18 Jan 2022, 15:54 +0000, [redacted], wrote:

Hi [redacted]- Sorry for the late reply. Just on the updated burial conditions, they are sitting with my lawyers who are extremely busy at the moment. Hopefully we can get them issued to you by the end of the month. [redacted] *Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government* Tel. [redacted] | Mob:

[redacted] **From:** [redacted] **Sent:** 06 January 2022 09:21 **To:** [redacted]

Subject: Whiteshore

Happy New Year [redacted] & [redacted],

The Omicron virus seems to be continuing to spread rapidly in the Western Isles and we are tightening our restrictions around our small bubble of workers. If any of your staff would like to visit our site could they please give me a call the day before so I can arrange for an individual to meet them. I will be working from Inverness from next week till the end of the month but I am available at all times on [redacted]. We are also requesting that anyone outside the Whiteshore site bubble takes a lateral flow test before arriving.

In case of complaints. I was at the site yesterday (after taking a LF test) and the smell was horrendous. Nothing to do with the fish though - all the machair area surrounding our site has been spread with rotten seaweed, the traditional crofting practice at this time of year, and the odour is a lot worse than than the mortars.

Is there any update on us getting an official letter confirming our derogation status as discussed at our last meeting?

Stay safe and best regards.

[redacted]

Sent: 16 December 2021 14:52

To: [redacted]

Cc: [redacted]

Subject: Whiteshore Cockles - Task and Finish Group - burial waste conditions - draft meeting notes

(annex 1)

Good afternoon everyone,

Thank you all for attending the Task and Finish Group Meeting on Monday the 13th of December.

Please see the attached document which covers the main topics discussed at the meeting including an update from Whiteshore Cockles Ltd, background to the Task and Finish Group, proposed burial derogation conditions and next steps/actions agreed.

Please can I ask you all to have a read of the notes and I invite you to send me any comments regarding the content.

If you have any questions or queries please let me know and I am also happy to discuss anything further with you should it be required.

Kind Regards

[redacted]

Policy Officer

Disease Prevention Team

Animal Health & Welfare Division

Directorate for Agriculture & Rural Economy

Scottish Government

From: [redacted]
Sent: 16 December 2021 16:23
To: [redacted]
Cc: [redacted]
Subject: Re: Whiteshore Cockles - Task and Finish Group - burial waste conditions - draft meeting notes

Good afternoon [redacted]

Ref: Proposed Derogation Conditions

Item 4. Please change to Lewis/ Harris.

Skye is outwith the CNES area.

Regards.

[redacted]

From: [redacted]
Sent: 10 December 2021 10:38
To: [redacted]
Cc: [redacted]
Subject: RE: whitsehore task and finish

Hi [redacted]

I think it would be good to have some representation from Marine Scotland at the meeting. CNeS emailed me last month advising they may not be able to offer official supervision at the site, along with concerns about actual capacity to bury fish waste

at the site. Attached the email for information. I expect it will be a discussion point at Monday's meeting.

[redacted]

[redacted]
*Animal Health - Disease Prevention Team | Animal Health & Welfare Division |
Directorate for Agriculture & Rural Economy | Scottish Government
Tel. [redacted] | Mob[redacted]*

From: [redacted]

Sent: 25 November 2021 17:03

To: [redacted]

Cc: [redacted]

Subject: Re: Whiteshore Cockles - Task and Finish Group - future conditions for the burial of fish waste

Good evening [redacted].

Nothing here that rings alarm bells although due to logistical / winter ground conditions/ administrative reasons a few of the items need discussed further to clarify our working practices.

I am available anytime over the next two weeks for a video call.

The numbers of mortalities will traditionally be very limited from now till May when the water temperature starts to rise again so this will help matters.

Everything is moving ahead well now with SEPA (since we employed a new consultant) and the engineers are also on schedule to get the plant fully installed.

Best regards

[redacted]

On 25 Nov 2021, 16:11 +0000, [redacted], wrote:

Dear [redacted] I want to start with extending my apologise to you on the time it has taken for the Task and Finish Group to get in contact with you. Over the past few months we have engaged within the group to identify conditions which we feel will enable the burial of fish waste under official supervision to be carried out at your site. I want to add that these conditions are not set in stone and open for discussion within reason: Proposed burial conditions No burial above ground (no bunded pits) Weekly list of morts detailing daily tonnage and origin sites to be emailed to eh@cne-siar.gov.uk. No pits left uncovered overnight, if pit has capacity left then predator net is firmly secured over the site – records and daily time stamped photographic evidence to be kept Animal by-product waste from aquaculture to be buried within 4 hours on arriving at site Skips to be cleaned and disinfected immediately on emptying in accordance with cleaning schedule agreed in advance with competent authority Only animal by-product waste from aquaculture from finfish farms operated by authorised Aquaculture Production Businesses and within the Western Isles Council planning authority area is received Any disposal of animal by-product waste from aquaculture above background levels (event mortality) have to be pre-notified to Western Isles Council and the Scottish Government with quantities, origin location and disposal plan To end on 31/03/22 – to be debated The site will be subject to a weekly unannounced inspection The Task and Finish Group would be happy to meet to discuss our thinking on these conditions. Let me know who should be included for a meeting and I will try to arrange a virtual meeting over the next couple of weeks. [redacted] Animal Health - Disease Prevention Team | Animal

From: [redacted]

Sent: 24 November 2021 15:07

To: [redacted]

Cc: [redacted]

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions
- for comment by 19 November

[redacted],

I don't have any concerns thanks – your comments in response to mine have helped clarify so thank you .

Condition (2) there may be benefit in clarifying the purpose (i.e. for monitoring capacity) either in the condition or else in the understanding between regulating parties. This will hopefully avoid any confusion that mortality reporting is required here for purposes of health monitoring.

Condition (7) as above.

Thanks for on going sight of this of this and the opportunity to comment, much appreciated.

[redacted]

[redacted]

(Working days Monday, Wednesday, Thursday)

Head of fish health and welfare
Marine Scotland – Aquaculture and Recreational Fisheries

Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

Tel: [redacted]

Mob: [redacted]

e: [redacted]

w: <http://www.scotland.gov.uk/marinescotland>

From: [redacted]
Sent: 17 November 2021 16:59
To: [redacted]
Cc: [redacted]
Subject: FW: Whiteshore Cockles - Task and Finish Group - burial waste conditions
- for comment by 19 November

annex 2

Afternoon [redacted]

As you know the main reason we have been pushing for the controls and conditions on the operation is the level of smell emanating from the site rather than from ABP controls. This is causing significant impact on the neighbouring area and can be detected from a large distance.

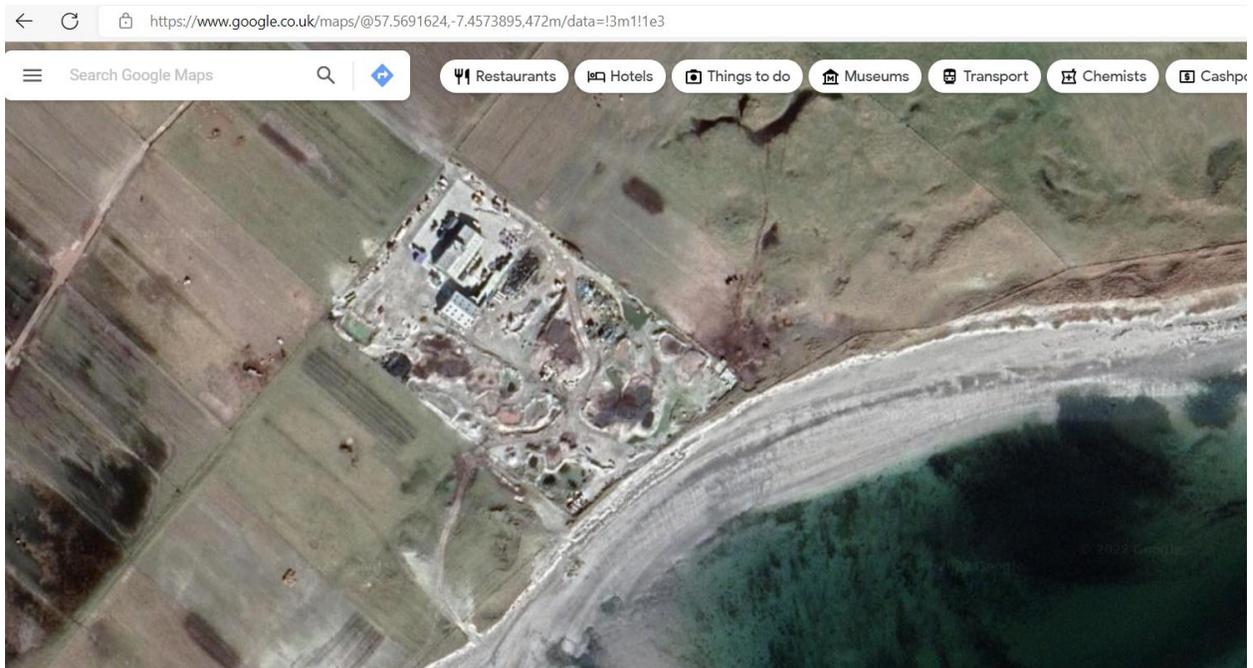
The Animal Health Officer was at the site on 1st November and although the site appeared relatively tidy there were approximately 11 bunded pits "open" in that they were covered in seaweed, which does little to prevent odour escape. The pits can't be covered with sand as it sinks into the liquid and would cause overflow. The operators have to wait for the waste to solidify enough/drain before properly covering and the pits will continue to emit smell until they can be fully covered. This is not in compliance with their existing method statement.

My understanding was that the site was allowed to continue burying waste to ensure that there was a local solution for routine morts and to ensure that staff could be employed until the new plant was up and running; however, there are no restrictions on the quantities they are taking.

There appears to have been significant quantities disposed of over the last few weeks and appears to be ongoing due to fish farm events/incidents, which may explain the 11 pits. The quantities involved in "event" mortalities again brings the site's capacity into question and increases the level and duration of odours. It is likely that some of these "open" pits will not be covered properly for months. This aerial photo, which appears to be relatively recent, gives an indication of some of the pits and limited land available. <https://www.google.co.uk/maps/@57.5696889,-7.4600288,490m/data=!3m1!1e3>.

We asked Whiteshores for details of what has been buried over the last period. The figures they supplied showed over 9800 tonnes buried in the last 16 months. Their method statement says the site has a capacity to hold 40,000 tonnes. These figures indicate that they have utilised nearly a quarter of the site's capacity in 16 months. If these figures are representative of previous years, even with natural breakdown, I would seriously question what capacity, if any, the site has remaining.

Also for context – assuming a 4 metre pit is achievable and 1m³ per ton – to bury October's waste (~1160 m³) would need the equivalent of a 17m x 17m pit.



We agreed to monitor the site using the proposed conditions below and based on the derogation ending on 31 March 2022. Given this date is now unlikely and they can't effectively comply with the main conditions that could limit odours I honestly don't see any real point in arranging monitoring as it will do little to mitigate the smells. Also based on the current method of disposal there are likely to be open pits well after the derogation end date.

[redacted] said the options are to extend the derogation to 31/3/23 or until the PPC permit is in place, whichever is the earlier, or they have to find another treatment route in the meantime. Given the ongoing concerns regarding capacity and odour, I don't see how we can support extending the derogation.

[redacted]

[redacted] | Manaidsear Seirbheisean Luchd-Cleachdaidh agus Arainneachd
(Consumer and Environmental Services Manager)

Roinn nan Coimhearsnachdan | Comhairle nan Eilean Siar | Rathad Shanndabhaig |
Steornabhagh | Eilean Leodhais | HS1 2BW

Communities Department | Comhairle nan Eilean Siar | Sandwich Road | Stornoway
| Isle of Lewis | HS1 2BW

[redacted] | [redacted] | Ext [redacted] | www.cne-siar.gov.uk

Links to further service information:

COVID

Trading Standards

Food Safety

Health and Safety at Work

Licensing

Animal Health & Welfare

Consumer & Environmental Services welcomes your feedback. Please help us improve our service by taking our short customer survey at www.surveymonkey.com/s/cnes-ces-c

Ag Obair Comhla airson na h-Eileanan Siar **COMHAIRLE NAN EILEAN
SIAR** Working Together for the Western Isles



From: [redacted]

Sent: 02 November 2021 16:37

To: [redacted]

Cc: [redacted]

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

WARNING: THIS EMAIL CAME FROM OUTSIDE THE COMHAIRLE; PLEASE TREAT HYPERLINKS OR ATTACHMENTS WITH CAUTION. CONTACT THE IT HELPDESK IF IN ANY DOUBT.

Thanks [redacted] and [redacted], both of your comments are helpful

Going back to [redacted] email, on the record keeping, I think we can make a work around on GDPR issues. WCL should be keeping commercial documents of all consignments going to the site under ABP Regulations. I am sure a system can be adapted to rely this information to CNeS for official supervision purposes. I will let CNeS comment on frequency of providing this data.

On event mortality, it is important we distinguish mortality that is above background levels. From what you say FHI already make this distinction, so this is not new. We have concerns about the current burial procedures and site capacity to bury fish morts at WCL. This is the reason we are reviewing the burial derogation to make it easier for CEnS to official supervise the site. The geographical condition should reduce the current volume of morts going to the site. However, we should also be aware of mortality levels above background levels to ensure disposal is managed properly. You mentioned the FHI provide guidance when levels rise above background, does it refer to ABP regulations?

On your questions:

- Who do these conditions apply to - whiteshore or the fish farms? I assume the conditions can only apply to whiteshore? Only WCL
- What is the difference in what is to achieved by condition (2) and condition (7)? Condition 2 is general record keeping compliance. Condition 7 would be to ensure large scale disposal is managed properly i.e. not sitting uncovered for days.
- What is the fish farm or whiteside to do i.e. notify only or notify and wait for approval? Because it's the latter and if there's a delay to approval, what do you expect the fish farm to do with mortalities in the meantime? In theory, we would not reject any request from fish farms local to WCL. We are trying to prevent large quantities of/any fish morts from out with Barra and Uist being disposed of at WCL.
- Why does a disposal plan need to forwarded everytime? Is it an operational requirement of the fish farm to have a disposal plan and is this not checked via other routes than a condition which applies to whiteshore? And equally if the conditions only apply to whiteshore than why does the disposal plan need to forwarded every time?

A disposal plan is needed because burial of fish morts is not be allowed. We have temporarily allowed burial for WCL and these conditions apply to WCL only. We want to ensure that fish morts that are not included under the derogation are not getting buried at WCL. We want to maintain strict

conditions for any fish farms that plan to use WCL as their method as disposal. So if a fish farm needs to use WCL for above background (event mortality) disposal then we need to have a process of recording that use.

Hope this is helpful.

[redacted]

[redacted]

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division |
Directorate for Agriculture & Rural Economy | Scottish Government*
Tel. **[redacted]** | Mob: **[redacted]**

From: [redacted]

Sent: 02 November 2021 09:20

To: [redacted]

Cc: [redacted]

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions
- for comment by 19 November

Folks

I support the comments that [redacted] has made, particularly querying why we are differentiating between routine, and non-routine – the challenges for alternative disposal routes are similar, or increased for non-routine. The challenge for the Uists / Barra is the current lack of disposal options and the difficulty of transporting the mortality off-island.

From the perspective of disease control, the challenge is to offer a biosecure disposal option at a reasonable distance from the source of the mortalities, whilst minimising nuisance.

With regard to what defines the farms in the Uists / Barra, I think of them as being the farms with their operating shore base in the Uists / Barra, regardless of where they are spatially in the sea.

Happy to discuss further if required.

[redacted]

Fish Health Inspectorate Group Leader

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

Tel: [redacted]

Mobile: [redacted]

www.gov.scot/marinescotland

From: [redacted]

Sent: 29 October 2021 09:00

To: [redacted]

Cc: [redacted]

Subject: FW: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

[redacted],

Hopefully the comments below are helpful but have copied [redacted] (FHI) in for additional comment / correction if he has anything to add.

From our perspective mortality for disposal is mortality for disposal i.e. whatever the volume, cause or 'event' the end result is fish which needs disposed of in accordance with waste management regulations. Legislation and Scottish Government policy is in place regarding mortality issues which arise during production. For example, mortality above 'background levels' is reported to the Fish Health Inspectorate, considered, investigated if necessary and managed according to advice given. In the event that a notifiable disease was found, the enforcement of contingency measures and advice by the FHI would ensure waste was disposed of in accordance with disease management measures.

Therefore I'm not seeing the need for distinction in conditions between 'routine' mortality of otherwise, and whether the mortality is the result of an 'event' or not. I recommend the conditions focus on waste management irrespective of the reason or volume for the waste. Some information regarding mortality on sites and cause is reported in the public domain and I would caution against the conditions being used to generate information on mortality for any reason other than monitoring of waste management at the site. There's may also be a data protection issue to be considered with regards to the collection of data which is not required for waste management purposes.

This provides the context for my comments below.

I'm happy to chat about my comments if it would be helpful.

[redacted]

[redacted]

(Working days Monday, Wednesday, Thursday)

Head of fish health and welfare
Marine Scotland – Aquaculture and Recreational Fisheries

Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

From: [redacted]

Sent: 28 October 2021 16:03

To: [redacted]

Subject: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Hello

I have received advice from my Scottish Government legal colleagues on the fish waste burial conditions. Nothing major to change but they would like to see a bit more detail in the conditions. I have highlighted the conditions that need more detail and put in bold who I think is best placed to advise.

Burial conditions

1. No burial above ground (no bunded pits)
2. Weekly list of morts detailing daily tonnage and origin sites to be emailed to eh@cne-siar.gov.uk. **Am assuming this is to monitor compliance that the site is only receiving from the geographic area the derogation is intended to support and appropriate use of site capacity rather than to mortality per se, because the latter would not be appropriate. Is weekly the correct frequency?**
3. No pits left uncovered overnight – records and daily time stamped photographic evidence to be kept.

Further specification on the meaning “uncovered”. Greater specificity on the requirements will make it easier to establish a breach of the condition. We have this in the original Method Statement - Hole is covered in sand. If the pit has capacity left then a predator net is firmly secured over the site. Probably a question for **CnES**, is this what you would be looking for by having the pits covered?

4. Fish morts to be buried within 4 hours of arriving on site.

Recommend changing to – Animal by-product waste from aquaculture to be buried within 4 hours on arriving at site.

5. Skips to be cleaned immediately on emptying.

More detail on cleaning requirements, again to be clearer is condition has been breached. Method statement states - The empty bins are transported to the wash area where they are steam cleaned and disinfected before the lids

are attached with cable ties. Are we content with this condition? Maybe **APHA** could state example to follow?

6. Only routine morts from Uist & Barra

Is routine sufficiently clear? Same with Uist and Barra. Would "from fish cultivated in waters [around/within x distance of] the coastline of Uist and Barra and any inland waters of those islands [if there are any fish on inland waters]" be more appropriate? Suggest **Marine Scotland** advise.

The Marine area is usually described by nautical miles from mean high spring tides. Alternatively it could be described by the planning authority jurisdiction which extends down to Mean Low Water Springs, with the exception of fish farming which extends out to 12 nautical miles. However if there is a need to distinguish between sites off Uist and Barra only then you may just have to specify

Also see my introductory comments regarding 'routine'. I'm unclear how 'routine' is being defined or why it matters. I would suggest its not relevant.

I suggest

'Only animal by-product waste from finfish farms operated by authorised Aquaculture Production Businesses and within the Western Isles Council planning authority area is received'

Or if the specific islands of Barra and (both?) Uist and not other islands need to be specified , you could say

'Only animal by-product waste from finish farms operated by authorised Aquaculture Production Businesses within coastal waters immediately adjacent to island X, island Y,....'

7. Any disposal of event morts have to be pre-notified to CNES & SG with quantities, origin location and disposal plan

Specification on an "event". Could **Marine Scotland** provide advice on event mortality? I dont think it's necessary to refer to 'event' mortalities. I cant think why the reason for mortality is relevant. It can be argued that any mortality is the result of an event.

I'm not familiar with legislation requirements of waste disposal and notification obligations, so I'm not clear if pre-notification is required. so accept the following as suggestions for clarifying with a view to improving the condition.

- Who do these conditions apply to - whiteshore or the fish farms? I assume the conditions can only apply to whiteshore?
- What is the difference in what is to achieved by condition (2) and condition (7)?

- What is the fish farm or whiteside to do i.e. notify only or notify and wait for approval? Because it's the latter and if there's a delay to approval, what do you expect the fish farm to do with mortalities in the meantime?
- Why does a disposal plan need to be forwarded everytime? Is it an operational requirement of the fish farm to have a disposal plan and is this not checked via other routes than a condition which applies to whiteshore? And equally if the conditions only apply to whiteshore than why does the disposal plan need to be forwarded every time?

8. To end on 31/03/22 – to be debated

9. The site will be subject to a weekly unannounced weekly inspection.

10. Whiteshores will pay £200+vat for CNES monitoring

There may be scope for CNeS to charge but it should be removed from the conditions.

Burial derogation

We are wanting to move away from an open ended derogation. The new derogation is likely to remain in place until 31 March (at which point it would come to an end), although subject to cancellation by the Scottish Ministers if Whiteshore Cockles fails to adhere to the conditions.

On top of the conditions, an additional event that might lead to the cancellation of the derogation could be the refusal of the PPC Permit. Burial is not a long term solution, so failure to get a PPC Permit would mean the aquaculture industry seek alternative disposal routes. Can **SEPA** advise on appealing a refusal of a the PPC Permit? Could a revised application be made after the initial refusal?

In any case, the new derogation will not make a categorical statement that a new derogation will not be granted if the existing one comes to an end. That will enable us to have a full range of options available to it.

Grateful for comment by 19 November.

Thanks

[redacted]

[redacted]

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division |
Directorate for Agriculture & Rural Economy | Scottish Government
Tel. [redacted] | Mob: [redacted]*

Other emails were redacted in full:

Email 14.

[redacted]

Email 15.

[redacted]

Email 16

[redacted]

Email 17

[redacted]

Email 18.

[redacted]

Email 19.

[redacted]

Email 24.

[redacted]

Email 25.

[redacted]

Email 26.

[redacted]

Email 27.

[redacted]

Email 28.

[redacted]

Email 29.

[redacted]

Email 30.

[redacted]

Email 31.

[redacted]

Email 32.

[redacted]

Email 33.

[redacted]

Email 34.

[redacted]

Email 35.

[redacted]

Email 36.

[redacted]

Email 37.

[redacted]

Email 43.

[redacted]

Email 44.

[redacted]

[Annex 1:](#)

**Scottish Government (SG)
Task and Finish Group Meeting
Monday 13th of December 2021**

1. Attendees:

Name	Initials	Business Area
[redacted]	[redacted]	Whiteshore Cockles Ltd (WCL)
[redacted]	[redacted]	Comhairle nan Eilean Siar (CnES)
[redacted]	[redacted]	Comhairle nan Eilean Siar (CnES)
[redacted]	[redacted]	Comhairle nan Eilean Siar (CnES)
[redacted]	[redacted]	Scottish Environment Protection Agency (SEPA)
[redacted]	[redacted]	Scottish Environment Protection Agency (SEPA)
[redacted]	[redacted]	Scottish Government (SG)
[redacted]	[redacted]	Scottish Government (SG)
[redacted]	[redacted]	Scottish Government (SG)
[redacted]	[redacted]	Scottish Government (SG)
[redacted]	[redacted]	Marine Scotland

2. Welcome and Introductions

- No Animal and Plant Health Agency staff were present due to the current Bird Flu situation.

3. Update from Whiteshore Cockles Ltd (WCL)

- [redacted] informed the group that work on the site was almost 95% complete.
- Electrical work including the installation of the control panel is complete.
- The Bio Mass Boiler is scheduled to be commissioned by the start of February 2022 with Inspection at the end of February 2022.
- All plant machinery will be in place by the end of February 2022.
- Work began on submitting the application for a Pollution Prevention and Control (PPC) Permit Part A two years ago, unfortunately this process was not completed to an adequate standard resulting in WCL hiring a second consultant to take over the application process.
- The new consultant has been working closely with SEPA over the past several months and regular meetings have been taking place between the two parties to help ensure the application is of the appropriate standard.
- WCL are hopeful that the PPC Permit Part A application will be submitted to SEPA by the end of January 2022.

4. Background to the Task and Finish Group

- Following complaint to the European Commission, we stopped farmed salmon from using the Animal By-Products (ABP) remote area derogation on 1 January 2016.
- This meant farmed ABP fish waste would not be able to be disposed of via landfill.
- Approved ABP disposal routes needed to be established and used.
- However, 2 derogations were granted to continue burial of ABP fish waste.
 - Shetland
 - WCL
- Both were for 6 months. Shetland completed works within timeline but the fish waste dryer at WCL is still delayed to this day.
- Moving to the Task & Finish Group, SG received complaints via Council back in March of this year.
- We relayed this information to the Cabinet Secretary. She stated situation could not continue and action must be taken to resolve complaints.
- New burial conditions drafted where Group feels official controls can be applied and monitored to WCL.

5. Burial Conditions

- [redacted] started off the discussion regarding the burial conditions by reiterating that overall this project is positive for moving the aquaculture industry towards a more sustainable future.
- [redacted] also noted that the SG supports this project but we do need to stop burying fish ASAP.
- [redacted] explained to the meeting that the initial project for the drier system was based on tonnage from the Southern Isles only.
- The fish companies in Lewis and Harris approached WCL to ask if they could take fish waste from them as well.
- This resulted in a large re-design of the plans, which trebled the size of the plant and the overall cost and also required a PPC Permit Part A from SEPA. This has resulted in a much longer timescale for completion.
- [redacted] asked what was a realistic timescale for PPC Permit Part A approval.
- [redacted] informed the group that a minimum of 4 months would be required from application submission but in most cases it would take longer than that.
- Normally more clarification is required on certain points, additional equipment, alternating plans, Statutory Instruments and advertising mean a timescale between six months and a year is more likely.
- The possibility of using the site from March next year whilst the PPC Permit Part A application was being processed was discussed between [redacted] and [redacted].
- [redacted] informed the group that CnES would not be in a position to monitor the site or carry out inspections in the future but reiterated concerns regarding the smells coming from WCL.

6. Proposed Derogation Conditions.

1. No burial above ground (no bunded pits).

- [redacted] burial above ground is not permitted at all and should not be happening.
- [redacted] explained that the bunding at the top of the pits are used to support seagull nets.

2. Weekly list of morts detailing daily tonnage and origin sites to be emailed to CNES.

- [redacted] described the record keeping process at WCL including how a Waste Transfer Document accompanies every load received which are then kept at the site office.
- The group was also informed that a daily log is also stored which covers all loads received and their origins.

3. No pits left uncovered overnight, if pit has capacity left then predator net is firmly secured over the site – records and daily time stamped photographic evidence to be kept.

- This requirement was in the original method statement and [redacted] agreed that this would be done including photographic evidence.

4. Animal by-product waste from aquaculture to be buried within 4 hours on arriving at site.

- [redacted] explained that during the months between March and October this will be achievable.
- During the winter months however sometimes the loads do not arrive from Skye/Harris until after 4 o'clock when it is dark. In this instance the consignments are sealed in containers, disinfected, stored overnight and buried first thing the next morning.

5. Skips to be cleaned and disinfected immediately on emptying in accordance with cleaning schedule agreed in advance with competent authority.

- [redacted] assured the group that this was already standard procedure and would continue in the future.

6. Only animal by-product waste from aquaculture from finfish farms operated by authorised Aquaculture Production Businesses and within the Western Isles Council planning authority area is received.

- [redacted] insisted that this was already the case and guaranteed that no fish morts that are not under the derogation would be getting buried at WCL.

7. Any disposal of animal by-product waste from aquaculture above background levels (event mortality) have to be pre-notified to Western Isles Council and the Scottish Government with quantities, origin location and disposal plan.

- [redacted] agreed to the above and explained that during the winter months a lot of the sites that use WCL are empty so he was not expecting much fish mort movement between now and April.

8. To end on 31/03/22 – to be debated.

- If the site was not operational by the 31 March 2022 what are the options?
- The stopping of the burial of fish waste was discussed.
- [redacted] explained that there is no other easy way to get the fish waste of the Island due to such circumstances as poor weather and lack of transport options.
- [redacted] also noted to the group that this could cause a major environmental problem on the island.
- [redacted] pointed out that two months ago there was 11 pits counted, 4 were sealed but 7 were left open where visible brown/dirty water could be seen lying on the top. This is a major cause of the smell which results in complaints being received by the Council from local residents.
- Covering the open pits with sand was discussed however [redacted] pointed out that the sand would sink to the bottom of the pits resulting in an overflow.
- [redacted] also raised concerns of capacity at the site which [redacted] alleviated by suggesting the use of land to the south.

9. The site will be subject to a weekly unannounced inspection.

- [redacted] informed the group that WCL were happy to facilitate any form of visits but suggested that due to current lack of activity at the site they may not be worthwhile.
 - [redacted] also requested “announced” inspections due to current Covid restrictions and low number of staff being utilised at the site.
 - [redacted] confirmed that CnES were not currently in a position to carry out inspections on the site.
 - [redacted] suggested inspections carried out independently.
 - [redacted] also noted that he has two companies ready to utilise any by-products produced by the new drier system when operational.
-
- An application for an approval under Animal By-Products (Enforcement) (Scotland) Regulations 2013 has also been submitted but requires the PPC Permit Part A to be in place before it can be progressed further.
 - [redacted] noted the scale of this problem and how everyone in the group is working towards finding a satisfactory outcome for all concerned.
 - [redacted] also acknowledged the time frames involved and discussed the possibility of allowing the site to start operating pending PPC Permit Part A.

6. Next Steps/Actions

- It was agreed by the group that once the plant is fully operational all burying of fish waste must cease immediately.
- [redacted] insisted that WCL must adhere to the original method statement which RT agreed too.
- SG to liase with CnES regarding official supervision.
- [redacted] to discuss the wording required in the new derogation with SGLD.
- [redacted] to also update the relevant Ministers and await feedback on derogation conditions.

[Annex 2:](#)

Method Statement

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Company	Whiteshore Cockles Ltd
Location:	Paible, Isle of North Uist
Working hours	Monday – Saturday 8.00 a.m – 7.0p.m.
Authorised Personnel	[redacted]. Director [redacted]. Site Manager. [redacted]. Company Secretary.

1. INTRODUCTION

This method statement describes the specific safe working methods and practices used to collect and dispose of morts collected by the Fish Farms within the Western Isles of Scotland. The content of this method statement reflects the findings of the relevant risk assessments and experience gained in carrying out these procedures for the past eight years.

2. DESCRIPTION OF WORK

The collection and disposal by burying of morts supplied by the Fish Farms in North Uist, Benbecula and South Uist. All farms are within one hour's road travel of the disposal site. In the case of a large outbreak of

disease then Lewis and Harris can be serviced only after authorisation is approved by the monitoring body.

3. COLLECTION PROCESS

Fish Farm manager informs Whiteshore Cockles Ltd authorised person of number of bins to be collected.

Authorised person informs producer when collection will be made and arranges for the disposal area to be prepared.

Transport operative inspects bins on arrival to ensure that no leakages are present. All bins must have an internal liner which must be sealed with a cable tie. In case of expansion, bins are only to be filled to a maximum of 150mm from the top. All lids must be securely attached by a cable tie at each corner. Site manager oversees the disinfection of the vehicle before exiting site.

ANY BINS NOT ADHERING TO THESE REGULATIONS WILL BE REJECTED FOR TRANSPORTATION

A waste transfer note must accompany each load. This has to be completed and signed by an authorised Fish Farm employee and the transport operator before leaving the site.

Includes:

5. BURIAL PROCESS

Site manager checks wind direction to ensure no odour will be detected by distant township.

Cable ties are removed from bins.

Liner is held back.

Fish are tipped out of bin by site telehandler under guidance from site manager.

Hole is covered in sand. If the pit has capacity left then a predator net is firmly secured over the site.

The empty bins are transported to the wash area where they are steam cleaned and disinfected before the lids are attached with cable ties.

Site telehandler is then steam washed and disinfected before transporting the cleaned bins to the producers designated storage area.

9. ENVIRONMENTAL RESPONSIBILITY

SNH and the RSPB are aware of the large numbers of corn bunting which have inhabited the site since operations began as they are thriving in the created environment.

This bird is a protected species and the site manager monitors their activity on a daily basis to ensure that there is no disturbance to their natural habitat.

In the winter months the site manager feeds the corn bunting with corn sheaf's supplied by RSPB.

The site is 2 hectares in size and has a capacity to hold 40,000 tons of morts. After the burial pit is closed it is then covered with seaweed which fertilises the area and creates a natural reseed.

The ground conditions are of “machair” type which is a sandy loam with pure sand underneath.

11. ADMINISTRATION AND MONITORING PROCESS

The waste transfer notes and site diary are maintained and kept in the site office by the site manager. These are collated weekly and taken to the company head office for administration.

All invoicing for mort disposal work is done on a monthly basis. Each company receives a copy of the corresponding waste transfer notes to match their invoices.

At the end of each month a total of the periods burials are sent to the local authority Comhairle Nan Eilean Siar who can monitor the mortification rates. Regular meeting swill be held between the authority and Whiteshore Cockles Ltd to discuss any relevant issues that have arisen.

[Annex 3:](#)

A long awaited new facility for dealing with mortalities from the salmon farming industry has reached a milestone with an application to the regulator, SEPA, for permission to begin production.

The Whiteshore Cockles facility, at Bayhead in North Uist, is crucial to fish farming throughout the Western Isles and it is envisaged the new plant will provide 15 jobs – a major employment boost for the island. At the same time, there are plans for innovative ways to use the by-products for potential benefit to the crofting community

After eight years of designing and installing a groundbreaking and innovative drier system to process the salmon mortalities into recycled by-products, the company told the Gazette this week that installation of the equipment is almost complete.

There have been years of discussions and advice involving SEPA and various consultants. Now they have submitted a Part A PPC application to SEPA to authorise a permit which will allow production to begin. When the plant is fully operative it is envisaged that the 15 staff will cover a range of trades and skills while transportation of fish from throughout the Western Isles also supports three full-time drivers and two part-time.

Whiteshore Cockles Ltd is a family owned company based in Bayhead and has been involved in the disposal of fish farm waste for 18 years. Angus Macdonald, his wife Michelle and son Fraser all work in the business which also has a construction arm.

Angus is better known as probably the biggest crofter in the Western Isles with a herd of Highland cattle which grazes on Vallay island. That background gives him a particular motivation to find ways in which the new facility can benefit the crofting community.

European legislation restricted their original method of disposal and made the company look to a more environmentally friendly recycling system which will help to ensure the long-term viability of the islands' fish farm industry.

A multi-million pound investment has been involved and the plant will produce fish oil and meal from the salmon waste in an odour-controlled environment. A biomass burner has been installed which will utilise half the meal as a fuel to heat the drier system. Excess heat can also be used to run the grain dryer and provide a service to crofters.

The remaining oil and meal will be used to produce biofuel and as an addition to an Anaerobic Digester system. The company is also exploring the idea of using the meal as low-grade agricultural fertiliser which again could be offered locally a lower-cost alternative to crofters.

New staff have already been employed to maintain and service the machinery and once the permit is granted the company will advertise for further employees to work within the site.

The company have thanked the fish farms for their continued support and encouragement as well as Highlands and Islands Enterprise for their financial assistance and the Bayhead community for "their patience and understanding of the various issues that have arisen whilst the plans and installation of the new processing plant have been taken place during the transition period".

Note:

From: Don Staniford <salmonfarmingkills@gmail.com>

Date: Fri, Oct 21, 2022 at 11:16 AM

Subject: Stornoway Gazette did NOT publish the letter as detailed by Angus MacDonald

To: <Ian.Murdoch@gov.scot>

Ian,

Please see below from the editor of the Stornoway Gazette.

Could you please provide a copy of the PUBLISHED material from the Stornoway Gazette in April 2022?

It seems that Angus MacDonald of Whiteshore Cockles may not have been entirely correct in his email to the Scottish Government.

Thanks,

Don

----- Forwarded message -----

From: Murray Macleod <murray.macleod@nationalworld.com>

Date: Fri, Oct 21, 2022 at 9:19 AM

Subject: Re: Letter from Angus MacDonald of Whiteshore Cockles published in April 2022?

To: Don Staniford <salmonfarmingkills@gmail.com>

Something did appear, but it wasn't in this form and wasn't in the form of a letter. It's difficult to get pdfs for anything over three months, due to the way our system works. It will take time.

On Fri, 21 Oct 2022 at 07:24, Don Staniford <salmonfarmingkills@gmail.com> wrote:

Murray,

Could you please confirm if a letter from Angus MacDonald of Whiteshore Cockles was published in the Stornoway Gazette on 14 April 2022?

This email was obtained via FOI from the Scottish Government:

From: [redacted]
Sent: 14 April 2022 09:50
To: [redacted]
Subject: Newspaper article



Stornoway Gazette
finished article.pdf (annex 3)

Good morning [redacted], [redacted],

Please find attached an article that I have written which will appear in the Stornoway Gazette today.

It has been a long journey but we see a light at the end of the tunnel now.

Thank you for your continued support.

Best regards

[redacted]

[Annex 4:](#)

OFFICIAL



Our Ref: [REDACTED]
[REDACTED]
[REDACTED]

Your Ref: [REDACTED]

If emailing, contact:
[REDACTED]

[REDACTED]
Whiteshore Cockles Limited
Balemore
Kyles Paible
Bayhead
North Uist
HS6 5EB

17 January 2022

Dear [REDACTED]

POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2012 ("the Regulations") (As amended)
ENFORCEMENT POSITION ON TEMPORARY OPERATION OF BIOMASS BOILER
SITE: Whiteshore Cockles Limited, Balemore, Kyles Paible, Bayhead, North Uist

Thank you for your request to operate the biomass boiler prior to the submission of an application for a Pollution Prevention and Control permit.

The operation of a new medium combustion plant or any other installation or part of an installation without being authorised under a permit would be an offence under Regulation 67(1) of the Regulations. However, SEPA has considered the issues surrounding the proposed commissioning and short-term operation of the biomass boiler to enable Renewable Heat Incentive (RHI) qualification emissions testing to occur. I can confirm that SEPA would not take any enforcement action if Whiteshore Cockles carry out the activity of the burning of fuel in a medium combustion plant with a rated thermal input of 1 – 20 MW, falling within Schedule 1, Part 1, Chapter 1, Section 1.1, Part B (d) of the Regulations, for the purposes of commissioning and emissions testing of the biomass boiler only, in accordance with the following specific conditions:

- (i) The commissioning of the Whiteshore Cockles Biomass Boiler (WCBB) is carried out as described in the documents provided to SEPA on 17 December 2021 and identified as 'Whiteshore Boiler commissioning plan V1.2 -Dec 2021' ("the Commissioning Plan").
- (ii) Only third-party supplied fuel as detailed in the Commissioning Plan shall be utilised in the WCBB.
- (iii) The operation of the salmon mortalities processing plant at the Site shall not commence and fuel produced by this facility will not be used in the WCBB.
- (iv) All emissions to air from the WCBB shall be free from offensive odour, as perceived by a person who is authorised in writing under Section 108 of the Environment Act 1995 to carry out duties on behalf of SEPA, outside the site boundary.

OFFICIAL



Chairman
Bob Downes

Chief Executive
Terry A'Hearn

Angus Smith Building

6 Parklands Avenue, Eurocentral,
Holytown, North Lanarkshire ML1 4WQ
tel 01698 839000 fax 01698 738155

www.sepa.org.uk • customer enquiries 03000 99 66 99

- (v) All emissions of smoke to air from the WCBB shall not exceed Ringlemann Shade 1.
- (vi) You shall take all necessary measures to minimise pollution arising from the commissioning and emissions testing of the WCBB in respect of noise and vibration, as far as reasonably practicable.
- (vii) There shall be no discharge of effluent to the Water Environment from the WCBB.
- (viii) Whiteshore Cockles shall notify SEPA at least 7 days prior to the commencement of the WCBB commissioning and emissions testing operations.
- (ix) Completion of the WCBB commissioning and emissions testing operations shall be notified to SEPA within 14 days of the above notification, or as otherwise agreed in writing with SEPA.

This enforcement position is specific to Whiteshore Cockles and remains in place for the duration of the WCBB commissioning and emissions testing.

Our adoption of this time limited site-specific enforcement position does not in any way pre-determine the outcome of your future permit application.

SEPA reserves the right to withdraw this enforcement position at any time. If you do not comply with the conditions of this letter or if SEPA considers that the activities are likely to cause significant harm to the environment or human health, or if such harm is caused, this enforcement position will be withdrawn immediately and enforcement action may be taken.

If you have any questions regarding this letter, please contact [REDACTED] by email on [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Unit Manager
Waste and Industry Unit
Environmental Performance

cc: [REDACTED] (by email)

Appendix:

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

Date: Fri, Oct 21, 2022 at 11:08 AM

Subject: Re: FOI review request re FOI/2022-00320862

To: <DirectorARE@gov.scot>

As an addition to the FOI review request, please see new evidence of ongoing illegal dumping at Whiteshore Cockles obtained from a local having the misfortune of living near Whiteshore Cockles in North Uist:

From: [name redacted]

Date: Fri, Oct 21, 2022 at 9:28 AM

Subject: Re: Still stinky?

To: Don Staniford <salmonfarmingkills@gmail.com>

We hear via a worker that there were 80-90 % morts at the farms and dumped somewhere around last week or the week before at Whiteshore. We could smell it. That high a mort rate should be hard to believe and it's very sad that it's not. If it was a cattle farmer he would be in jail!

On Fri, 21 Oct 2022 at 08:54, Don Staniford <salmonfarmingkills@gmail.com> wrote:

Wow! I just received some FOI documents on Whiteshore Cockles from the Scottish Government but many were refused - appealing now.

On Fri, Oct 21, 2022 at 8:40 AM [name redacted] wrote:

Yes, about two weeks ago it was very active. Apparently high mort rate across the farms..... could smell at the primary school..... :(so much for the incinerator!

On Fri, 21 Oct 2022 at 06:56, Don Staniford <salmonfarmingkills@gmail.com> wrote:

Are morts still being dumped at Whiteshore Cockles?

Best fishes,

Don

From: **CNES FOI Team** <foi@cne-siar.gov.uk>

Date: Fri, Oct 21, 2022 at 9:06 AM

Subject: Re: FOI request re. Whiteshore Cockles since 1 November 2021
[Ticket#2022102127000047]

To: Don Staniford <salmonfarmingkills@gmail.com>

Dear Don Staniford

I write to acknowledge receipt of your request for information and note the terms of your request as detailed below. We've automatically assigned this request an reference of **2022102127000047**. Please use this reference number in all correspondence with us (Tip: replying to this email, so that the ticket ref is included in email subject is the easiest way to correspond with us on this case)

Your request for information will be processed in accordance with the Freedom of Information (Scotland) Act 2002 (the Act) / Environmental Information (Scotland) Regulations 2004 (the EIRs) and guidance issued by the Office of the Scottish Information Commissioner. A response to your request for information will be issued promptly and in any event within 20 working days following receipt of the request.

--

Le durachd,
Freedom of Information Team
Comhairle nan Eilean Siar | Sandwick Road | Stornoway | Isle of Lewis | HS1 2BQ
Web: www.cne-siar.gov.uk
Tel: 01851 822721 (*Extension 211 599*)

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Fri, Oct 21, 2022 at 9:01 AM
Subject: FOI request re. Whiteshore Cockles since 1 November 2021
To: CNES FOI Team foi@cne-siar.gov.uk

Please provide information on Whiteshore Cockles since 1 November 2021.

Please include emails, letters, complaints and any other documentation pertaining to Whiteshore Cockles since 1 November 2021.

Please include any mortality data received relating to the disposal and transport of farmed salmon to Whiteshore Cockles since 1 November 2021.

A recent FOI disclosure this week from the Scottish Government includes emails showing that mortality data was recently reported for the first time to Comhairle nan Eilean Siar following the establishment of a task force in 2021. Please therefore include any data, reports and other information detailing the weight and number of mortalities being disposed of and transported to Whiteshore Cockles since 1 November 2021.

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

Please provide a receipt for this FOI request.

Please provide the information electronically.

Thanks,

Don Staniford

Director, Scamon Scotland

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Fri, Oct 21, 2022 at 8:51 AM
Subject: FOI review request re FOI/2022-00320862
To: DirectorARE@gov.scot
Cc: Ian.Murdoch@gov.scot

Please consider this a formal request for a review of FOI/2022-00320862.

For easy reference, the FOI letter (dated 17 October 2021 - not 17 October 2022) and various annexes are attached below. I have also copied in Ian Murdoch who replied to \$camon \$cotland's FOI request dated

Suffice to say that \$camon \$cotland objects to the heavily redacted emails - over 20 emails have been redacted completely (#s 14-19; 24-37 and 43-44).

Annex A of the [Scottish Government's FOI reply letter dated 17 October 2021](#) (the correct date should obviously read 17 October 2022) argues that disclosure would compromise the 'candour' of Ministers and officials:

Annex A

An exception applies:

An exception under regulation 10(4)(e) of the EIRs applies to some of the information you have requested. Regulation 10(4)(e) of the EIRs allows a Scottish public authority to withhold internal communications. In this case internal Scottish Government discussions in relation to general policy and decision making, including ministerial correspondence and legal advice for formulating official responses.

This exception 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 exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, there is a greater public interest in high quality policy and decision-making, and in the properly considered implementation and development of policies and decisions. This means that Ministers and officials need to be able to consider all available options and to debate those rigorously, to fully understand their possible implications. Their candour in doing so will be affected by their assessment of whether the discussions on aquatic animal by-product disposal will be disclosed in the near future, when it may undermine or constrain the Government's view on that policy while it is still under discussion and development.

\$camon \$cotland strongly disagrees with the Scottish Government position detailed above and considers this a dangerous erosion of the public right to know. The illegal nature of the Whiteshore Cockles farmed salmon dump in North Uist has been well known for well over a decade. This is a clear public interest issue with news coverage since 2004 published in The Sunday Times, The Times, The Daily Mail, the BBC One Show and The Ferret.

Ministers and officials have delayed, debated and prevaricated on the legality of waste disposal at Whiteshore Cockles over three decades - as shown via previous FOI disclosures. To refuse public access to ongoing discussions before and after March 2022 (when burial of diseased farmed salmon at the site was scheduled to have finally stopped) is unreasonable.

The claim that "Ministers and officials need to be able to consider all available options and to debate those rigorously, to fully understand their possible implications" is ludicrous given the length of discussions. The public has a right to know how the illegal disposal of Scottish salmon at Whitehorse Cockles has been aided and abetted by Ministers and officials.

\$camon \$cotland therefore requests that the Scottish Government's refusal to disclose reams of emails is reviewed and overturned.

\$camon \$cotland's FOI request dated 17 September 2022 (which includes a tip-off on 16 September 2022 that Whiteshore Cockles was still burying diseased salmon) is enclosed below for easy reference too.

Please provide a receipt for this FOI review request.

Thanks,

Don Staniford

Director, \$camon \$cotland

Agriculture and Rural Delivery Directorate
Animal Health and Welfare Division



Scottish Government
Riaghaltas na h-Alba
gov.scot

E: Ian.Murdoch@gov.scot

Mr Don Staniford
Scottish Salmon Watch
salmonfarmingkills@gmail.com

Our ref: FOI/202200320862

17 October 2021

Dear Mr Staniford

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

Thank you for your request dated 17 September 2022 under the Environmental Information (Scotland) Regulations 2004 (EIRs).

Your request

You asked for information on Whiteshore Cockles in North Uist - including photos, videos, Cabinet Briefings, letters, emails, correspondence with SEPA, Salmon Scotland, Mowi, Loch Duart, Bakkafrost Scotland/The Scottish Salmon Company, CalMac, Western Isles Council, APHA and any other information since 12 November 2021.

Also to include any discussions and information on the legality of dumping diseased salmon in Scotland with respect to EU, Scottish and UK law.

Also to include any discussion and information in relation to the dumping, ensiling, burning and transport of dead/diseased Scottish salmon.

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

Response to your request

I enclose a copy most of the information you requested.

While our aim is to provide information whenever possible, in this instance we are unable to provide some of the information you have requested because an exception under regulation 10(4)(e) - internal communications, 10(5)(f) and 11(2) - personal data of the EIRs applies to that information. The reasons why that exception applies are explained in Annex A to this letter.

We may hold some information of relevance to your request, obtained through the Scottish Government's surveillance activities associated within aquatic animal health. The outcomes of that surveillance, including any information of relevance where such exists, is subject to active publication through the Scottish Government website:

<https://www.gov.scot/collections/publication-of-fish-health-inspectorate-information/>

We do not hold any information for your request for any discussion or information on the legality of dumping diseased salmon in Scotland with respect to EU, Scottish and UK law as no discussions have taken place since 12 November 2021.

Information on the on the disposal, ensiling, burning and transport of dead fish and aquatic animal by-products can be found on the Scottish Government website:

<https://www.gov.scot/publications/animal-by-products-disposal-guidance/pages/disposal-of-aquaculture-animal-by-products/>

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:

George Burgess
Director of Agriculture and Rural Economy
Scottish Government
Saughton House
Broomhouse Drive
Edinburgh
EH11 3XD

Email: DirectorARE@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.

Saughton House, Broomhouse Drive, Edinburgh EH11 3XD
www.gov.scot



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

Ian Murdoch
Animal Health – Disease Prevention Team

An exception applies:

An exception under regulation 10(4)(e) of the EIRs applies to some of the information you have requested. Regulation 10(4)(e) of the EIRs allows a Scottish public authority to withhold internal communications. In this case internal Scottish Government discussions in relation to general policy and decision making, including ministerial correspondence and legal advice for formulating official responses.

This exception 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 exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, there is a greater public interest in high quality policy and decision-making, and in the properly considered implementation and development of policies and decisions. This means that Ministers and officials need to be able to consider all available options and to debate those rigorously, to fully understand their possible implications. Their candour in doing so will be affected by their assessment of whether the discussions on aquatic animal by-product disposal will be disclosed in the near future, when it may undermine or constrain the Government's view on that policy while it is still under discussion and development.

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.

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

Date: Sat, Sep 17, 2022 at 6:27 AM

Subject: FOI re. Whiteshore Cockles & the dumping, ensiling, burning and transport of dead/diseased Scottish salmon since 12 November 2021

To: CEU@gov.scot

Further to <https://www.gov.scot/publications/foi-202100254831/> - filed on 12 November 2021:

Please provide information on Whiteshore Cockles in North Uist - including photos, videos, Cabinet Briefings, letters, emails, correspondence with SEPA, Salmon Scotland, Mowi, Loch Duart, Bakkafrøst Scotland/The Scottish Salmon Company, CalMac, Western Isles Council, APHA and any other information since 12 November 2021.

Please also include any discussions and information on the legality of dumping diseased salmon in Scotland with respect to EU, Scottish and UK law.

Please also include any discussion and information in relation to the dumping, ensiling, burning and transport of dead/diseased Scottish salmon.

The Times, for example, reported in June 2022: "[Haulier kicks up stink over ferry ban](#)"

\$camon \$cotland received a tip-off last night that the burying of diseased salmon continues at Whiteshore Cockles (this corroborates repeated complaints from locals who have passed on information) - see enclosed at the end of this email (name and email address supplied but redacted upon request).

As context, the Scottish Government's FOI disclosure on 20 January 2022 suggested that Whiteshore Cockles would cease dumping diseased Scottish salmon at the end of March 2022. This was reported via:

[Closing the Net on Diseased Scottish Salmon - Whiteshore Cockles Finally Dumped in March! The Ferret: "The 'illegal' dumping of dead fish in Hebridean beauty spot set to end"](#)

Please provide this information under the relevant FOI and Environmental Information regulations.

Please provide the information electronically.

Please provide a receipt.

Thanks,

Don Staniford

Director, \$camon \$cotland

From: **Scottish Scamon** <notice@godaddy.com>

Date: Fri, Sep 16, 2022 at 6:28 PM

Subject: A message from your Scottish Scamon contact form.

To: <salmonfarmingkills@gmail.com>

Scottish Scamon has received a new message.

Name

Email

Message

You mentioned that Whiteshore Cockles had lost their license. They are still in business as far as I can see. They are still burying salmon in North Uist this week. Please don't publish my name against this news.