SCOTTISH SALMON WATCH

CHEMICALS

Date: 8 July 2020

Subject: FOI re. Well Boats & Salmon Farms Since 1 October 2018

Please provide information on well boats and salmon farms since 1 October 2018.

- Please include data on chemical use including Azamethiphos, Deltamethrin, Hydrogen Peroxide, Emamectin benzoate, Imidacloprid (BMK08/Ectosan) and any other chemicals, medicines, antibiotics and anti-parasiticides which may be used via well boats.

- Please include any discussions relating to the input, sharing and publication of well boat data on chemical use by salmon farms via 'Scotland's Aquaculture' and SEPA's 'Scottish Pollutant Release Inventory' (this would include dialogue with salmon farmers, chemical companies and government agencies).

- Please include copies of any well boat licences issued since 1 October 2018.

- Please provide information on well boat bio-security, cleaning, mort disposal, diseases and chemical waste discharges in relation to salmon farming (including information relating to how and where the wastes, effluents and mortalities are discharged, transported and disposed of).

- Please include any information relating to the transfer of licensing/regulatory powers for well boats from the Scottish Government (Marine Scotland) to SEPA including Cabinet Briefings, emails, letters and any other information.

For example, a redacted email dated 6 December 2018 (believed to be from Marine Scotland) obtained by Scottish Salmon Watch from the Scottish Government via FOI in December 2019 stated:

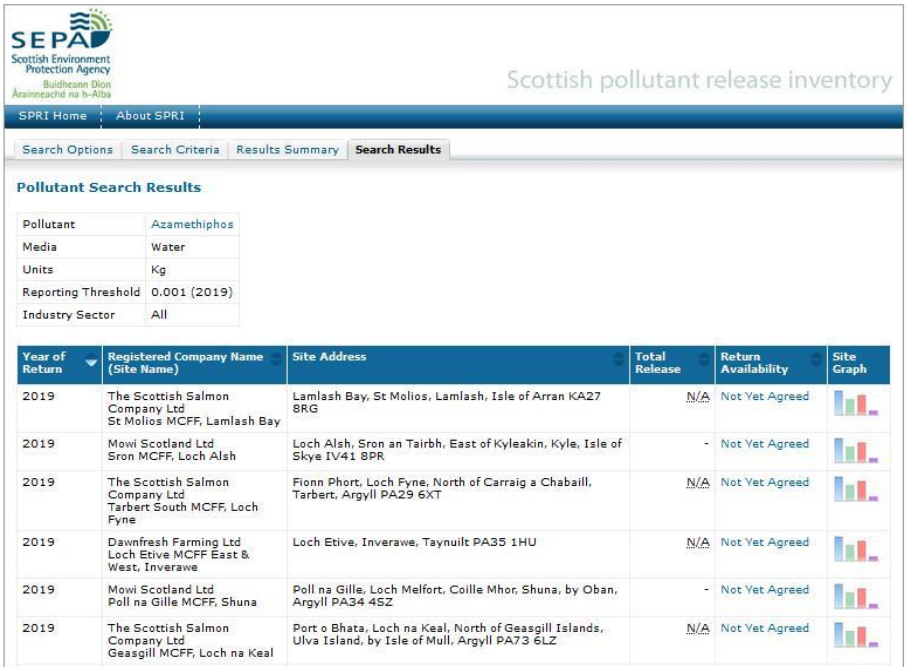
"The position for now is very clear. MS has been the licensing authority for wellboat discharges for the last 8 years, However, and as the Cabinet Secretary [Fergus Ewing] will be aware from the discussions at the Aquaculture Industry Leadership Group, Marine Scotland have been actively looking at moving forward on the recommendation from the 2016 'Independent review of Aquaculture Consents', which looked at the licensing role for wellboat discharge moving to SEPA. That recommendation has raised some challenges but it still under active consideration and we are hopeful (sic) close to a conclusion"

Scottish Salmon Watch is interested in why the transfer of licensing from Marine Scotland to SEPA is taking so long and why well boat data on chemical use by salmon farms is not posted publicly in a more speedy manner.

As context, an extract from Scottish Salmon Watch's media backgrounder "All is Not Well With Sick Scottish Salmon" (October 2018) is enclosed below as an Appendix.

A recent blog - "Public Register of Toxic Chemicals Used in Scottish Salmon Farming?" (2 July 2020) - also included:

Whilst data for the use of Azamethiphos, Deltamethrin and Emamectin benzoate on salmon farms is currently available up until the end of March 2020 (Q1 2020), SEPA has still not bothered to upload data on the use via well boats via their Scottish Pollutant Release Inventory for 2019.



SEPA Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Scottish pollutant release inventory

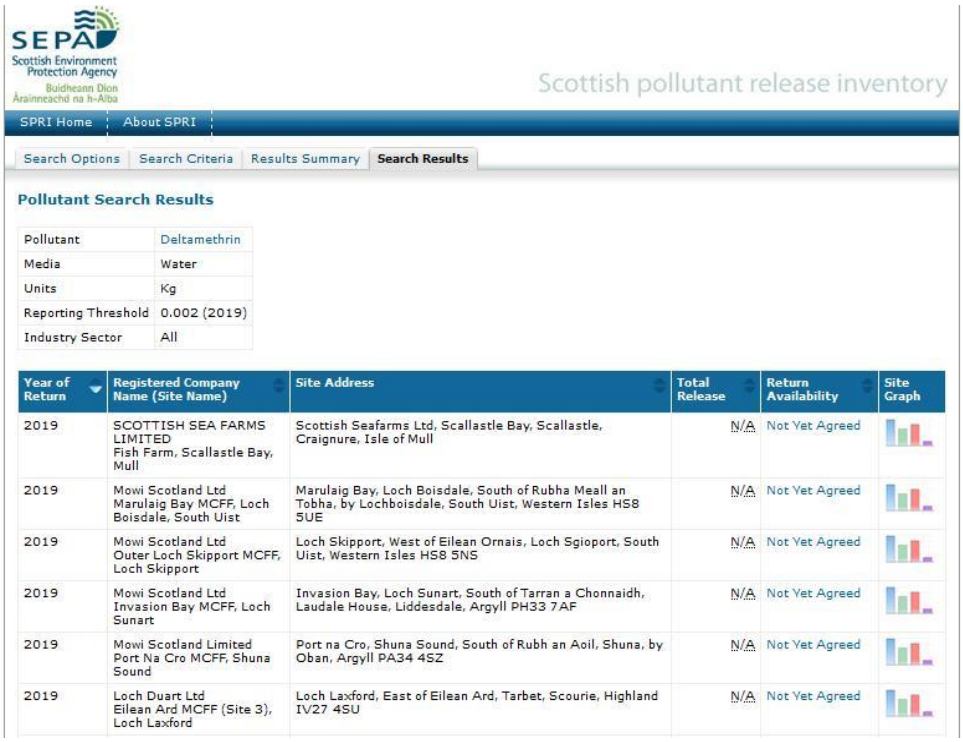
SPRI Home | About SPRI

Search Options | Search Criteria | Results Summary | **Search Results**

Pollutant Search Results

Pollutant	Azamethiphos
Media	Water
Units	Kg
Reporting Threshold	0.001 (2019)
Industry Sector	All

Year of Return	Registered Company Name (Site Name)	Site Address	Total Release	Return Availability	Site Graph
2019	The Scottish Salmon Company Ltd St Molios MCFF, Lamlash Bay	Lamlash Bay, St Molios, Lamlash, Isle of Arran KA27 8RG	N/A	Not Yet Agreed	
2019	Mowi Scotland Ltd Sron MCFF, Loch Alsh	Loch Alsh, Sron an Tairbh, East of Kyleakin, Kyle, Isle of Skye IV41 8PR	-	Not Yet Agreed	
2019	The Scottish Salmon Company Ltd Tarbert South MCFF, Loch Fyne	Fionn Phort, Loch Fyne, North of Carraig a Chabaill, Tarbert, Argyll PA29 6XT	N/A	Not Yet Agreed	
2019	Dawnfresh Farming Ltd Loch Etive MCFF East & West, Inverawe	Loch Etive, Inverawe, Taynuilt PA35 1HU	N/A	Not Yet Agreed	
2019	Mowi Scotland Ltd Poll na Gille MCFF, Shuna	Poll na Gille, Loch Melfort, Coille Mhor, Shuna, by Oban, Argyll PA34 4SZ	-	Not Yet Agreed	
2019	The Scottish Salmon Company Ltd Geasgill MCFF, Loch na Keal	Port o Bhata, Loch na Keal, North of Geasgill Islands, Ulva Island, by Isle of Mull, Argyll PA73 6LZ	N/A	Not Yet Agreed	



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Scottish pollutant release inventory

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Search Options | Search Criteria | Results Summary | **Search Results**

Pollutant Search Results

Pollutant	Deltamethrin
Media	Water
Units	Kg
Reporting Threshold	0.002 (2019)
Industry Sector	All

Year of Return	Registered Company Name (Site Name)	Site Address	Total Release	Return Availability	Site Graph
2019	SCOTTISH SEA FARMS LIMITED Fish Farm, Scallastle Bay, Mull	Scottish Seafarms Ltd, Scallastle Bay, Scallastle, Craignure, Isle of Mull	N/A	Not Yet Agreed	
2019	Mowi Scotland Ltd Marulaig Bay MCFF, Loch Boisdale, South Uist	Marulaig Bay, Loch Boisdale, South of Rubha Meall an Tobha, by Lochboisdale, South Uist, Western Isles HS8 5UE	N/A	Not Yet Agreed	
2019	Mowi Scotland Ltd Outer Loch Skipport MCFF, Loch Skipport	Loch Skipport, West of Eilean Ornais, Loch Sgioport, South Uist, Western Isles HS8 5NS	N/A	Not Yet Agreed	
2019	Mowi Scotland Ltd Invasion Bay MCFF, Loch Sunart	Invasion Bay, Loch Sunart, South of Tarran a Chonnaidh, Laudale House, Liddesdale, Argyll PH33 7AF	N/A	Not Yet Agreed	
2019	Mowi Scotland Limited Port Na Cro MCFF, Shuna Sound	Port na Cro, Shuna Sound, South of Rubh an Aoil, Shuna, by Oban, Argyll PA34 4SZ	N/A	Not Yet Agreed	
2019	Loch Duart Ltd Eilean Ard MCFF (Site 3), Loch Laxford	Loch Laxford, East of Eilean Ard, Tarbet, Scourie, Highland IV27 4SU	N/A	Not Yet Agreed	

In December 2019, [Scottish Salmon Watch revealed following a FOI disclosure by the Scottish Government] that Marine Scotland was keen to "downplay" any reference to wellboat discharge licensing moving to SEPA as it "may well be seized upon".

The move of licensing wellboat discharges from Marine Scotland to SEPA "may well be seized on" concedes a [redacted email dated December 2018]:

From: [Redacted]
Sent: 07 December 2018 11:28
To: [Redacted]
Cc: [Redacted]

Subject: RE: For information only - Outcome of meetings on 28 November - mortality disposal + Benchmark cleantreat
Attachments: Cab Sec brief - benchmark - Dec 2018.docx

[redacted] – thanks. Happy in large part, but I've suggested downplaying the references to wellboat discharge licensing moving to SEPA as it shouldn't affect consideration of this proposal under the current system (and any suggestion that it might may well be seized on).

Regards, [redacted]

The move of licensing wellboat discharges to SEPA (recommended back in 2016 by the Aquaculture Industry Leadership Group) has "raised some challenges but it still under active consideration and we are hopeful to a conclusion" states another redacted email dated December 2018.

From: [Redacted]
Sent: 06 December 2018 09:00
To: [Redacted]
Cc: [Redacted]
Subject: RE: For information only - Outcome of meetings on 28 November - mortality disposal + Benchmark cleantreat

[redacted]

Many thanks for sharing.

I agree it would be worth referencing both the report and the focus on medicine use (see below) but also that the REC report said 'The Committee recognises the need to ensure that the licensing regime for medicines is fit for purpose and sufficiently robust to prevent environmental damage or impact on other species. It notes and welcomes the Fish Health Framework workstream which is dedicated to the licensing of fish treatment.'

RECOMMENDATION 32 The publication of this research leaves the Committee in no doubt that effective regulation of medicine used by the farmed salmon industry is a requirement. In this regard, it welcomes the action by SEPA to the UK Technical Advisory Group (UK TAG) to make recommendations to the Scottish Government on new environmental standards for Emamectin Benzoate. It also calls on SEPA and the Scottish Government to similarly consider the environmental impact of other medicines by the industry. (see paragraph 293)

For now the key issue is around the text at your para 8 and I have offered a few suggested changes below.

'Legislative Framework – BAHL raised with the Cabinet Secretary that they were unclear of applicable legislation following the call. However the position for now is very clear. MS has been the licensing authority for wellboat discharges for the last 8 years. However, and as the Cabinet Secretary will be aware from the discussions at the Aquaculture Industry Leadership Group, Marine Scotland have been actively looking at moving forward on the recommendation from the 2016 'Independent review of Aquaculture Consents', which looked at the licensing role for wellboat discharge moving to SEPA. That recommendation has raised some challenges but is still under active consideration and we are hopeful close to a conclusion. The legislative framework has subsequently been clarified to BAHL by MS and an offer has been made to further discuss if they are not clear.'

I am not sure of the wider benefits of a presentation to the sub group and what expectations that might bring with it, but that is just an observation.

I suggest you address to both Cab Secs.

Read more via "Cleaning Tox-Sick Scottish Salmon"

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

Please provide the information electronically.

Please provide a receipt for this FOI request.

Thanks,

Don Staniford

Director, Scottish Salmon Watch

Appendix:

Extract from Scottish Salmon Watch's "All is Not Well With Sick Scottish Salmon" (October 2018)

Is data on chemical use via wellboat reported publicly?

SEPA told Scottish Salmon Watch in May 2018 that data on the use of toxic chemicals is NOT included via the Scotland's Aquaculture database:

"I have asked colleagues who confirm that it is not included on Scotland's Aquaculture page," said SEPA in an email dated on 1 May 2018. "However It is included in the SPRI figures that are published on SEPA's website."

A letter from SEPA dated 29 May 2018 included:

Response

[1] Wellboat chemical use is not reported on Scotland's Aquaculture Website.
Under the terms of Regulation 9 of the EIRs, SEPA has a duty to provide advice and assist. We advise that SEPA does not directly regulate wellboats. It is the requirement of the operator's marine licenses to supply all well boats treatment notifications to Marine Scotland. SEPA is provided information relating to some well boat treatments when when copies of the notifications are provided to SEPA by Marine

Scotland. In accordance with Regulation 14(1)(b) of the EIRs we advise that you may wish to contact Marine Scotland to enquire further on the reporting of well-boat chemical use data. The general enquiries email address for the Scottish Government is ceu@gov.scot

And:

[3] Please note that the azamethiphos release to water was reported on the SEPA SPRI website in 2016. You can search and download and view the data on our public website here http://apps.sepa.org.uk/spripa/Search/ByPollutant/Results.aspx?Media=water-d&Pollutant=169&Year=2016&IncludeBrt=Y

[4] We confirm that Wellboat azamethiphos use will be added to SPRI. Please note that but SEPA has yet to receive the 2017 wellboat use figures from Marine Scotland. SEPA does not hold this information therefore 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. The public interest in making the requested information available is outweighed by that in maintaining the exception in regulation 10(4)(a) of the EIRs.

We advise the information will be available on SEPA's website in the Autumn 2018 (normally published in October).

However, a letter from Marine Scotland dated 28 June 2018 (via FoI/18/01265) claimed that wellboat usage of chemicals has been included in the Scotland's Aquaculture database since 2014:

Your request

You asked for, "...information on well boat licences issued by MS-LOT to fish farm operators to permit the discharge of chemotherapeutants. Please provide copies of all well boat licences and copies of well boat licence returns detailing chemical use. Finally, please clarify whether the use of chemical via well boats is included in the data published via the Scotland's Aquaculture database:

http://aquaculture.scotland.gov.uk/data/fish_farms_monthly_biomass_and_treatment_reports.aspx i.e. Is well boat chemical use included or not via Scotland's Aquaculture database? If so, when was well boat chemical use data included?"

Response to your request

I enclose a link to most of the information you requested.

The answers to your questions in relation to Scotland's Aquaculture website are yes and 2014.

Previously, SEPA explained in June 2017 (via F:0187827):

Response
Please refer to the enclosed documents for details of amount of product used on 40 well boats sites since 1 January 2016.

Under SEPA's duty to advise and assist under the terms of regulation 9 of the EIRs, we advise data is not included in the treatment reports via Scotland's Aquaculture database because this was not included on the original specification when the website was being developed. We currently do not have resource to place this data on the website. Please note the well boat data is currently available on SEPA's SPRI database and can be accessed in the link below.

http://apps.sepa.org.uk/spripa/Search/Options.aspx

And SEPA explained in October 2018 (via F:0189594):

Please note that these figures do not include treatments carried out in wellboats, which are reported to Marine Scotland. In accordance with Regulation 14(1)(b) of the EIRs, the contact details can be found via the following link; https://www.gov.scot/Topics/marine

On 13 October 2018, Scottish Salmon Watch wrote to the Director of SEPA and Director of Marine Scotland asking for clarification on whether chemical use via wellboats was reported via the Scotland's Aquaculture database.

Legislative & Licence Background:

A letter dated 17 April 2018 from the Director of Marine Scotland to the Scottish Parliament's Environment, Climate Change & Land Reform Committee included:

'Wellboat licences'

Wellboat licences are issued by MS-LOT to fish farm operators to permit the discharge of chemotherapeutants following treatment for sealice in a vessel (a wellboat). Such licences are only issued where a valid Controlled Activity Regulations (CAR) licence has been issued to the relevant fish farm site for discharge of chemotherapeutants following in-cage treatments by SEPA following its consideration of the environmental effects. The volumes permitted for discharge are the same as the CAR volumes and Marine and CAR licences are conditioned to prohibit the release of chemotherapeutant under one regime at the same time as the other, thereby avoiding cumulative effects.

Wellboat licences are issued for three (3) years.

MCA and NLB have confirmed they will not provide routine comment on the applications for 'wellboat licences' as there is not a navigational element.

SEPA has provided standing advice that it has no objection to 'wellboat applications' provided the type and amount of chemical used and discharged will not exceed that specified in the respective CAR licence. An agreed condition is added to licences which prevents the simultaneous discharge from bath treatments.

SNH is consulted where such activity takes place in a European site, and advise of the likely significant effects. SNH directs MS-LOT to advice given by SNH during the CAR licensing process. MS-LOT would look to adopt the 'appropriate assessment' carried out by the SEPA as the competent authority under The Conservation (Natural Habitats, &c.) Regulations 1994. Again, a similar process occurs where SNH advise that an activity may affect the feature of a Marine Protected Area (MPA).

In May 2018 the Scottish Aquaculture Industry Leadership Group reported:

Scottish Aquaculture Industry Leadership Group

Meeting 22nd May 2018 Agenda and Actions Note

CW summarised findings of research commissioned by HIE on behalf of the AILG on future skills requirements for the industry including supply chain. Next steps will include drafting of a skills action plan. AILG members repeated previous requests for Marine Scotland to provide site specific advice on sea lice. MP reported on progress across the 8 'quick wins' arising from the consenting review (http://www.gov.scot/Resource/0052/00525256.pdf). Aside from the transfer of wellboat discharge licensing from Marine Scotland to SEPA, these had all been completed or were well on track for completion (a workshop would be held in June to finalise the work on the EIA template and the Working Arrangements Document, with a view to sign off by July 2018.) On the transfer of wellboat licensing from Marine Scotland to SEPA, there continued to be legal questions requiring clarification but it was hoped a positive resolution of the legal issues could be reached within a few weeks.	

The Scottish Aquaculture Industry Leadership Group noted in February 2018:

MP updated on progress with the ICR recommendations. Detailed at http://www.gov.scot/Resource/0052/00525256.pdf All projects were progressing well or had been completed. It was noted that on the integration of wellboat marine licences into the CAR regime the process was necessarily complex and would take time to work through. . would shortly be updated on the current state of play.	

In January 2018, the Farmed Fish Health Framework Working Group noted:

Farmed Fish Health Framework Working Group (FFHFWG)
Meeting 2
30 January 2018
Note and Actions

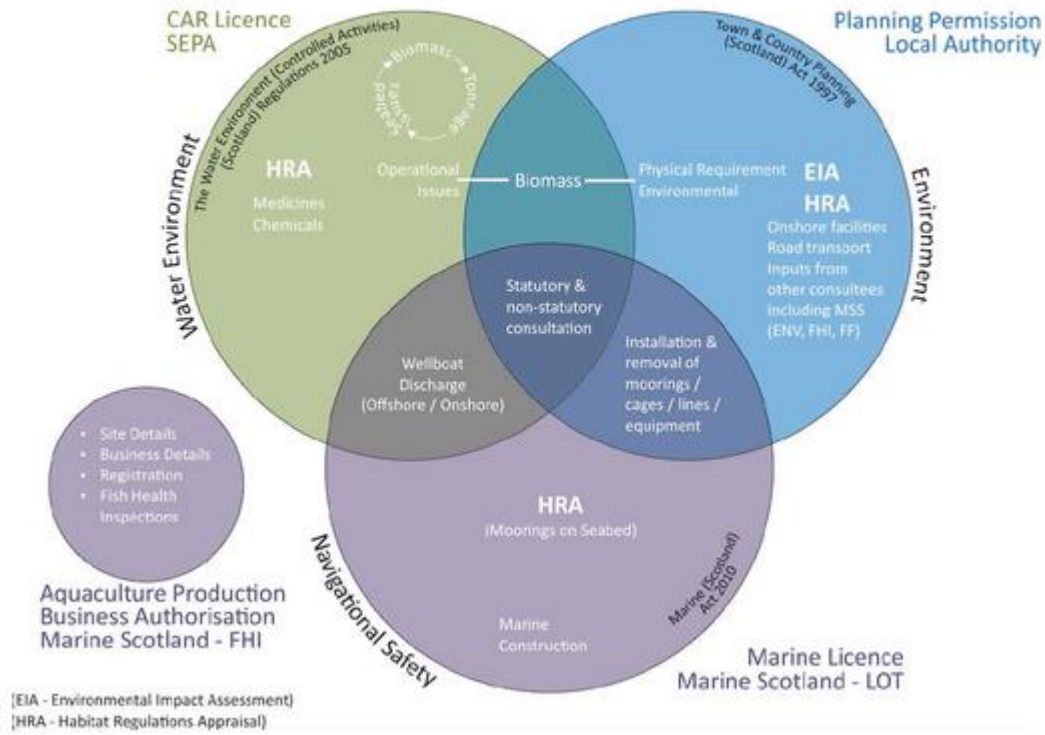
- It was noted the independent consenting review (ICR) recommendation on wellboat discharge licenses was outstanding.
- SG confirmed that an update would be provided at the next aquaculture industry leadership group and would be relayed to the farmed fish health working group at the next meeting.

Action: SG to keep FFHWG updated with ICR wellboat discharge licence recommendation.

Marine Scotland
Secretariat
February 2018

An 'Independent Review of Scottish Aquaculture Consenting' published by the Scottish Government in July 2016 identified "wellboat discharge" as overlapping in the consenting area for SEPA and Marine Scotland:

Figure 4.11: Venn diagram illustrating overlap in consenting areas for key regulators



The report included (p13):

A Ministerial Group on Aquaculture (MGA) was established in 2009 to oversee implementation of A Fresh Start, through six working groups. The MGA has since been replaced by the Ministerial Group for Sustainable Aquaculture (MGSA), which was established in 2013 to continue the work of the MGA and to support Scotland's aquaculture industry to achieve the 2020 growth targets. This includes the following working groups:

- Wellboats Working Group: considers standards for wellboats - tracking position, valve status & sea lice filtration.

And (p30):

4.2.4 Marine Licence

With respect to finfish and shellfish aquaculture, three types of activities require a marine licence(s):

- Equipment – including mussel lines, fish farm cages, walkways/pontoon;
- Moorings (i.e. deposits on the seabed); and
- Discharge of sea lice treatments from wellboats.

In relation to equipment and moorings, the marine licence focuses only on potential hazards to navigation and conditions may require appropriate markers and lighting. A separate marine licence for 'discharge of treatment agents' is also required for discharging from a wellboat. This is not focused on navigational safety and is not specifically needed to gain consent for a fish farm, but will be applied for during the operational phase, if required.

And (p53):

Table 6.1: Recommended quick wins

No.	Action	Responsibility
QW4	**Integrate wellboat Marine Licence into the CAR Licence** • It is understood that this would require one additional sentence to be added to the CAR Licence. • It is assumed that this would cover all wellboat discharges. • It is noted that SEPA and the finfish industry support this consolidation of licences.	SEPA MS-LOT

And (p74):

Table 7.1: Summary of recommendations

No.	Actions
Quick WIns	
QW	1. Strengthen the pre-application process 2. Introduce consistent format for co-ordinates, site name and summary information 3. Update of Working Arrangements document 4. Integrate wellboat Marine Licence into the CAR Licence 5. Update Scottish Aquaculture portal

Here's a copy of a wellboat discharge licence:

marinescotland

T: +44 (0)1224 295579
E: ms.marinelicensing@gov.scot

The Scottish Government
Riaghaltas na h-Alba

Marine Licence Application for Discharge of Treatment Agents from a Wellboat

Version 1.0

Marine (Scotland) Act 2010

The licence includes:

6. **Wellboat Discharge Details**

   (a) Give a brief description of the discharge including rationale for discharge.

   (b) Provide the proposed start date of the project. The start date will not be backdated, since to commence a project for which a licence has not been obtained will constitute an offence, which may result in appropriate legal action. A licence is normally valid for the duration of the project but not exceeding 3 years. If a project will not be completed before a marine licence lapses, it will be necessary for licence holders to re-apply for a further licence to continue any ongoing work at least 14 weeks prior to the expiry date of the licence. **Target duration for determination of a marine licence application is 14 weeks.**

(c) Provide the proposed completion date of the project.

(d) Describe the location of the proposed works. Include a list of the latitude and longitude co-ordinates (WGS84) of the site where discharge will take place. WGS84 is the World Geodetic System 1984 and the reference co-ordinate system used for marine licence applications. Co-ordinates taken from GPS equipment should be set to WGS84. Coordinates taken from recent admiralty charts will be on a WGS84 compatible datum. Ordnance survey maps do not use WGS84.

Example: For positions read from charts the format should be as in the example: 55°55.555'N 002°22.222'W (WGS84). The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the format should be as in the example: 55°55'44"N 2°22'11"W (WGS84).

It is important that the correct positions, in the correct format, are included with this application, as any errors will result in the application being refused or delayed.

To supplement your application, please provide a suitably scaled extract of an Ordnance Survey Map (1:2,500 scale but not more than 1:10,000) or Admiralty Chart which must be marked to indicate:

- the discharge site and associated marine farm;
- latitude and longitude co-ordinates defining the location of the works;
- the level of MHWS;
- any adjacent SAC, SPA, SSSI, MPA, Ramsar or similar conservation area boundary.

Drawings and plans will be consulted upon. If they are subject to copyright, **it is the responsibility of the applicant to obtain necessary approvals to reproduce the documents and to submit suitably annotated copies with the application.**

(e) Provide details of the water depth at the discharge site in metres and the distance of the discharge site from land in metres or kilometres.

(f) Indicate if the discharge site is located within the jurisdiction of a statutory harbour authority and provide details of the statutory harbour authority where relevant.

(g) Provide assessment of the potential impacts the works may have, including interference with other uses of the sea. Please include details of areas of concern e.g designated conservation areas, such as a SAC, SPA, SSSI, MPA or Ramsar site and shellfish harvesting areas. Further guidance on designated conservation areas can be obtained from SNH at this website: http://gateway.snh.gov.uk/sitelink/index.jsp and guidance on shellfish harvesting areas can be obtained from http://www.foodstandards.gov.scot/ with regards to the Shellfish Waters Directive (2006/113/EC) which has parameters set to protect the water quality in which edible shellfish are grown.

Where there are potential impacts from the works, please provide details of proposed mitigation in response to potential impacts.

7. Details of Treatment Agent(s) to be Discharged

Provide the proprietary name(s) of all treatment agents (e.g. Excis), the chemical name(s) or other relevant description(s) of all chemicals (e.g. Cypermethrin) and provide all appropriate Material Safety Data Sheets.

Under section 27(2) of the Marine (Scotland) Act 2010, the licensing authority has an obligation to consider the availability of practical alternatives when considering applications involving disposal of substance(s) or object(s) at sea. All applications for sea disposal must be supported by a detailed assessment of the alternative options - BPEO assessment. This must include a statement setting out the reasons why deposit of the substance(s) or object(s) at sea is the preferred option and applications will not be considered unless they are accompanied by such an assessment. All options in the BPEO must be explored fully (as per the guidance documents) otherwise your form and BPEO are liable to be returned to you, thereby delaying processing of the application.

8. Details of Discharge

For each treatment agent deposit listed in section 7 provide the date of discharge (wherever possible approximate date of discharge must be provided); duration of discharge in minutes (the estimated duration that the treatment agents being discharged are likely to be detectable/active in the water column); weight/volume of the treatment agent in grams/cubic metres (the discharge dose of each agent, including post treatment if required); and the total volume of the treatment agent (the total volume to be discharged from each vessel and also the number of wells in each vessel to be used during the procedure).

9. Details of Discharge Procedure

For each treatment agent deposit listd in section 7 provide the method of deposit (e.g gravity, discharge pump); the mode of deposit (e.g through a pipeline, valve, diffuser, bucket); the depth of deposit (e.g sea surface, subsurface with depth in metres); and the rate of deposit (e.g discharge rate – litres or m^3 per second, minute or hour. This must be given for each well).

10. Details of Vessel(s) Undertaking Discharge

Provide the name and call sign, if appropriate, of each of the vessels involved in the procedure. It is understood that vessel availability issues often lead to changes over small time scales to vessel choice. Please be as exhaustive as possible in the list of vessels that may be used to reduce the need for further administrative changes and continue on a separate sheet if necessary.

11. Scotland's National Marine Plan

Scotland's National Marine Plan has been prepared in accordance with the EU Directive 2014/89/EU, which came into force in July 2014. The Directive introduces a framework for maritime spatial planning and aims to promote the sustainable development of marine areas and the sustainable use of marine resources. It also sets out a number of minimum requirements all of which have been addressed in this plan. In doing so, and in accordance with article 5(3) of the Directive, Marine Scotland have considered a wide range of sectoral uses and activities and have determined how these different objectives are reflected and weighted in the marine plan. Land-sea interactions have also been taken into account as part of the marine planning process. Any applicant for a marine licence should consider their proposals with reference to Scotland's National Marine Plan. A copy of Scotland's National Marine Plan can be found at: http://www.gov.scot/Publications/2015/03/6517/0

Indicate whether you have considered the wellboat discharge with reference to Scotland's National Marine Plan and provide details of considerations made including reference to the policies that have been considered. If you have not considered the project with reference to Scotland's National Marine Plan please provide an explanation.

A Scottish Government report - Environmental Assessment (Scotland) Act 2005 Aquaculture and Fisheries Bill Consultation Document Environmental Report - published in February 2012 included:

8.0 WELLBOAT CONTROLS

Current Situation

8.1 Wellboats are used in the Scottish aquaculture industry primarily for the transport of live fish and in the application of therapeutant treatment for sea-lice. Anecdotal evidence indicates that between 20-30 wellboats are currently used in the aquaculture industry in Scotland and these vessels are often shared between the Scottish and Norwegian aquaculture industries. The use of a wellboat in aquaculture is licensed through Marine Scotland, where a licence must be held for each farming site where a wellboat is used.

8.2 In addition to transferring live fish between farm cages and, sometimes, between farm management areas, wellboats are commonly used for transporting smolts to ongrowing sites and harvest fish to slaughter, with approximately 70% of Scottish salmon production being collected by direct harvest wellboats as of 2006[37]. So called "dead-boats" are regularly used for the on-site slaughter and transport of harvested salmon to processing plants. All wastes from dead-boats, including wastewater, are required to be disposed of on land under the Pollution Prevention and Control (PPC) permit. No discharges to sea should be made from these vessels.

8.3 The CoGP details a cleaning and decontamination regime for wellboats, particularly when transporting fish or moving between FMAs[38]. While regulatory controls and codes of practice[39] are in place for the management

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[37] Humane Slaughter Association (2006) Fish Welfare During Transport Forum, 25 October 2006 Thistle Hotel, Inverness [online] Available at: www.hsa.org.uk/Resources/Fish%20Transport%20proceddings.pdf

[38] Fraser DI, Munro PD and Smail DA (2006) Fisheries Research Services Internal Report No 13/06: Disinfection Guide Version IV - Practical Steps To Prevent The Introduction And Minimise Transmission Of Diseases Of Fish, Produced By Fisheries Research Services, Marine Laboratory, Aberdeen, January 2006 [online] Available at: http://www.scotland.gov.uk/Topics/Marine/Fish-Shellfish/Fhi/Healthpractice

[39] Joint Government/Industry Working Group On ISA (2000) A Code Of Practice To Avoid And Minimise The Impact Of Infectious Salmon Anaemia (Isa), [Online] Available At: Http://Www.Scotland.Gov.Uk/Topics/Marine/Fish-Shellfish/Fhi/Healthpractice

and monitoring of sea-lice and diseases in farmed stock in Scotland, the cage to cage, farm to farm and farm to processing plant transfers of fish remain a potential vector for the transmission of sea-lice and pathogens[40], particularly where vessels collect and deliver fish from multiple sites in separate FMAs. Risks are lower for fish movements within defined FMAs established for the management of sea-lice, disease control and biosecurity, compared with fish movements between separate management areas.

8.4 While wellboats can be equipped with oxygenation systems and sensors enabling continuous monitoring of dissolved oxygen, temperature and carbon dioxide in holding bay waters[37], it is understood that it may be common practice for wellboat operators to open the valves or "flush" the water in the holding bays to allow fresh oxygenated water in during the transport of live fish. Although the CoGP states that transport water should not be discharged en route directly into natural watercourses and that wellboats must travel with valves closed and not undertake water exchange when within 5km of any finfish farm site, no monitoring controls are in place and this remains a potential source of sea-lice and/or pathogen transmission.

8.5 Our understanding is that in-bath treatments are the most common means of sea-lice and pathogen treatment on Scottish salmon farms, but that wellboats are also used for sea-lice treatment. This method can increase the efficacy of therapeutant and reduce the quantity required, as the salmon are exposed to a bath treatment in as little as one-third of the water that would be used in cage treatments using a tarp[41]. In this process, the boat is positioned adjacent to the sea cage and the salmon are loaded from the cages into its holding bay for therapeutant application. After the treatment is finished, the treated fish are unloaded and returned to the sea cage, and the residual treatment water is discharged from the wellboat at this location.

8.6 As well as the permitted discharge of therapeutant, the discharged treatment water may also typically include dead and surviving sea-lice. Given that this discharge is local, the likelihood of transmission of lice or pathogens between farms and the wider marine environment is considered to be the same as for in-bath treatments done within the cages.

Proposals

8.7 The proposed provisions include powers to Scottish Ministers to provide for controls on discharges from wellboats.

Potential Effects

8.8 The proposed introduction of additional controls for wellboat discharges and species movements are intended to control and manage sea-lice and pathogens associated with finfish aquaculture. Wellboats have been identified as a potential pathway for the transmission of sea-lice and pathogens.

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[40] Murray AG, Smith RJ, and Stagg RM. (2002) Shipping and the Spread of Infectious Salmon Anemia in Scottish Aquaculture. Emerg Infect Dis. [serial on the Internet]. 2002 Jan [online]. Available at: http://wwwnc.cdc.gov/eid/article/8/1/01-0144.htm

[41] Atlantic Canada Fish Farmers Association (2011) Evaluation of Well Boat Technology for the Treatment of Sea Lice, [online] Available at: 0101.nccdn.net/.../Final_Report_Mar_19_11_-_Evaluation_of_Well_Boat_Technology_for_the_Treatmen.pdf

8.9 Improved control of sea-lice and pathogens has the potential for significant environmental benefit, since these can adversely affect wild salmonid populations.

Mitigation

8.10 As no significant negative effects from these provisions have been identified, no mitigation measures are required. Given the high-level nature of the provisions, enhancement measures have not been proposed at this stage of the Bill's development.

Effects of Continuing the Status Quo

8.11 Continuing the current situation would result in the continuing risk that sea-lice may be discharged from wellboats, which would have adverse implications for wild salmonid populations.

And:

Freedom of Information on Chemical Use via Wellboats:

Background:

In March 2018, Scottish Salmon filed FOI requests on the use of chemicals via wellboats with the Scottish Environment Protection Agency, Marine Scotland and Scottish Natural Heritage. These FOI requests were followed up during the course of 2018 with various FOI replies generating vast quantities of information on discharges of chemicals via wellboats (for more details please read Appendix).

Data disclosed by SEPA on 3 October 2018 (via F:0189594):

Thank you for your recent request, received by SEPA on 25 September 2018 in which you asked for the following information:

Please provide an annual breakdown on the use of chemicals on salmon farms via a) tarpaulins; b) well boats since 1 January 2013.
Please include the use of hydrogen peroxide, azamethiphos, cypermethrin, deltamethrin and any other chemical treatments via tarpaulins and well boats.
Please give data for 2013, 2014, 2015, 2016, 2017 and thus far during 2018.
Please also provide any information detailing any breakdown of chemical usage via tarpaulin or well boat in any documents, materials, data, presentations or correspondence.

Response
Please note that data on the use of azamethiphos, cypermethrin, deltamethrin is publicly available and easily accessible. In accordance with the terms of Regulation 6(1)(b) of the EIRs we advise that the data is available via Scotland's Aquaculture Website. http://aquaculture.scotland.gov.uk/

Please find below the figures for hydrogen peroxide treatments via tarpaulins for the years 2013-2017.

	Hydrogen Peroxide (litres)
2013	6788634.5
2014	9082650.5
2015	19564988
2016	11873924.5
2017	9504378.5

Figures for 2018 are not due to be reported until late Jan 2019. SEPA does not hold this information at this time therefore 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.

Please note that these figures do not include treatments carried out in wellboats, which are reported to Marine Scotland. In accordance with Regulation 14(1)(b) of the EIRs, the contact details can be found via the following link; https://www.gov.scot/Topics/marine

Data disclosed by the Scottish Government on 28th June 2018 (via FoI/18/01265) - data disclosed via Dropbox online here:

2017		Kames					
Site	A3	MCMS No.	Date	Time	Duration	Product	Amount
Shuna		05769	42745	14:50	60 Minutes	Salmosan	200 g
Shuna		05769	42746	16:05	60 Minutes	Salmosan	200 g
Shuna		05769	42747	13:50	60 Minutes	Salmosan	200 g
Shuna		05769	42748	15:00	60 Minutes	Salmosan	200 g
Shuna		05769	42749	13:10	60 Minutes	Salmosan	200 g
Shuna		05769	42750	14:50	60 Minutes	Salmosan	200 g
Shuna		05769	42751	13:15	60 Minutes	Salmosan	200 g
Shuna		05769	42752	14:35	60 Minutes	Salmosan	200 g
Shuna South West		05338	42745	14:50	60 minutes	Salmosan	200 g
Shuna South West		05338	42746	16:05	60 minutes	Salmosan	200 g
Shuna South West		05338	42747	13:50	60 minutes	Salmosan	200 g
Shuna South West		05338	42748	15:00	60 minutes	Salmosan	200 g
Shuna South West		05338	42749	13:10	60 minutes	Salmosan	200 g
Shuna South West		05338	42750	14:50	60 minutes	Salmosan	200 g
Shuna South West		05338	42751	13:15	60 minutes	Salmosan	200 g
Shuna South West		05338	42752	14:35	60 minutes	Salmosan	200 g

2017		Grieg Seafood Ltd					
Site		MCMS No.	Date	Time	Duration	Product	Amount
West of Burwick		06123	3/1/2017	06:10	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/1/2017	09:50	20 mins	Alphamax and Hydrogen Peroxide	180ml and 2850L
West of Burwick		06123	3/1/2017	13:50	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/1/2017	17:30	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/1/2017	20:00	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/2/2017	06:00	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/2/2017	09:00	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/2/2017	12:00	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	3/2/2017	15:00	20 mins	Alphamax and Hydrogen Peroxide	360ml and 5700L
West of Burwick		06123	4/11/2017	06:30	20 mins	Salmosan and Paramove	180g and 2400L
West of Burwick		06123	4/11/2017	09:55	20 mins	Salmosan and Paramove	360g and 4800L
West of Burwick		06123	5/17/2017	11:20	20 mins	Salmosan and Paramove	360g and 5400L
West of Burwick		06123	5/17/2017	15:50	30 mins	Salmosan	180g
West of Burwick		06123	5/17/2017	16:50	30 mins	Salmosan	180g
West of Burwick		06123	5/17/2017	20:35	30 mins	Salmosan	360g

2017	Marine Harvest					
Site	MCMS No.	Date	Time	Duration	Product	Amount
Camus Glas	05997	07/01/2017 to 10/01/2017			Salmosan (Azamethiphos)	1840 grams
BDNC	05887	09/01/2017 to 20/01/2017			Salmosan (Azamethiphos)	2660 grams
PNG	05881	09/01/2017 to 20/01/2017			Salmosan (Azamethiphos)	4160 grams
Shuna South West	05769	09/01/2017 to 20/01/2017			Salmosan (Azamethiphos)	2240 grams
Gorsten	06004	23/01/2017 to 24/01/2017			Salmosan Vet (Azamethiphos)	
Cairidh	05996	04/02/2017 to 07/02/2017			Salmosan (Azamethiphos)	220g

Full file online here

2016	Scottish Sea Farms					
Site	Ref No.	Date	Time	Duration	Chemical/Agent	Amount
Spelve B	05425	5/24/2016	09:37	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/24/2016	13:10	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/24/2016	16:45	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/24/2016	20:10	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/25/2016	09:20	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/25/2016	13:20	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/25/2016	16:47	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/25/2016	20:06	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/26/2016	09:50	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/26/2016	13:15	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/26/2016	16:50	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/26/2016	20:15	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/27/2016	09:20	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/27/2016	12:30	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/27/2016	15:55	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	5/27/2016	19:10	20 mins	Hydrogen Peroxide	924 lts

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2015	Scottish Sea Farms					
Site	FKB No.	Date	Time	Duration	Product	Amount
Fishnish B		8/22/2015	9:00:00 AM	60 mins	Hydrogen Peroxide	924 litres
		8/22/2015	12:00:00 PM	50 mins	Hydrogen Peroxide	924 litres
		8/22/2015	3:00:00 PM	50 mins	Hydrogen Peroxide	924 litres
		8/22/2015	6:00:00 PM	50 mins	Hydrogen Peroxide	924 litres
		8/22/2015	8:00:00 PM	50 mins	Hydrogen Peroxide	924 litres
		8/23/2015	7:00:00 AM	50 mins	Hydrogen Peroxide	924 litres
		8/23/2015	11:00:00 AM	50 mins	Hydrogen Peroxide	924 litres
		8/23/2015	3:00:00 PM	50 mins	Hydrogen Peroxide	924 litres
		8/23/2015	7:00:00 PM	50 mins	Hydrogen Peroxide	924 litres
		8/24/2015	9:00:00 AM	50 mins	Hydrogen Peroxide	924 litres

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2014	Hjaltland Seafarms					
Site	FKB No.	Date	Time	Duration	Product	Amount (Litres)
Gob na Hoe	FKB/W216	6/30/2014	9:46:00 AM	20 mins	Hydrogen Peroxide	3000.000
		6/30/2014	1:36:00 PM	20 mins	Hydrogen Peroxide	2675.000
		6/30/2014	5:20:00 PM	20 mins	Hydrogen Peroxide	2669.000
		7/1/2014	10:06:00 AM	20 mins	Hydrogen Peroxide	2644.000
		7/1/2014	1:26:00 PM	20 mins	Hydrogen Peroxide	2643.000
		7/1/2014	4:56:00 PM	20 mins	Hydrogen Peroxide	2635.000
		7/7/2014	9:56:00 AM	20 mins	Hydrogen Peroxide	2626.000
		7/7/2014	1:16:00 PM	20 mins	Hydrogen Peroxide	2631.000
		7/7/2014	5:21:00 PM	20 mins	Hydrogen Peroxide	2626.000
		7/8/2014	10:26:00 AM	20 mins	Hydrogen Peroxide	2624.000
		7/8/2014	2:26:00 PM	20 mins	Hydrogen Peroxide	2612.000
		7/8/2014	5:51:00 PM	20 mins	Hydrogen Peroxide	2601.000
		7/9/2014	9:36:00 AM	20 mins	Hydrogen Peroxide	2591.000
		7/9/2014	1:31:00 PM	20 mins	Hydrogen Peroxide	2579.000

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2013	Scottish Sea Farms					
Site	FKB No.	Date	Time	Duration	Product	Amount (L)
Bloody Bay	W130	6/15/2013	10.10	20 mins	Hydrogen Peroxide	1386
		6/15/2013	13.28	17 mins	Hydrogen Peroxide	2772
		6/15/2013	16.20	20 mins	Hydrogen Peroxide	2772
		6/15/2013	20.05	20 mins	Hydrogen Peroxide	2772
		6/16/2013	11.40	20 mins	Hydrogen Peroxide	2772
Toyness	W119	15/02/2013	1:00:00 PM	20 mins	Hydrogen Peroxide	1145
		15/02/2013	3:25:00 PM	20 mins	Hydrogen Peroxide	1145
		15/02/2013	6:00:00 PM	20 mins	Hydrogen Peroxide	1145
		16/02/2013	9:40:00 AM	20 mins	Hydrogen Peroxide	1145
		16/02/2013	11:40:00 AM	20 mins	Hydrogen Peroxide	1145
		16/02/2013	1:50:00 PM	20 mins	Hydrogen Peroxide	1145

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A1				
2012	The Scottish Salmon Company			
Site	Area	**Date**	**Product**	**Amount (Litres)**
Eughlam	6A	07/06/2012	Hydrogen Peroxide	2000
		07/06/2012	Hydrogen Peroxide	2000
		07/06/2012	Hydrogen Peroxide	2000
		07/06/2012	Hydrogen Peroxide	2000
		08/06/2012	Hydrogen Peroxide	2000
		08/06/2012	Hydrogen Peroxide	2000
		08/06/2012	Hydrogen Peroxide	2000
		08/06/2012	Hydrogen Peroxide	2000
		09/06/2012	Hydrogen Peroxide	2000
		09/06/2012	Hydrogen Peroxide	2000
		09/06/2012	Hydrogen Peroxide	2000
		09/06/2012	Hydrogen Peroxide	2000
		09/06/2012	Hydrogen Peroxide	2000
		10/06/2012	Hydrogen Peroxide	2000
		10/06/2012	Hydrogen Peroxide	2000

Full file [online here]

2011	**Lakeland Marine**			
Site	**Area**	**Date**	**Product**	**Amount (kg)**
Fishnish A	15B	11/16/2011	Hydrogen Peroxide	951.5
		11/16/2011	Hydrogen Peroxide	1124.5
		11/16/2011	Hydrogen Peroxide	1384
		11/23/2011	Hydrogen Peroxide	2076
		11/23/2011	Hydrogen Peroxide	1903
		11/23/2011	Hydrogen Peroxide	1913
		11/24/2011	Hydrogen Peroxide	1903
		11/24/2011	Hydrogen Peroxide	1903
		11/24/2011	Hydrogen Peroxide	1903
Vidlin North	2A	27/10 - 09/11	Hydrogen Peroxide	81100
		04/12 - 15/12	Hydrogen Peroxide	46000
Vidlin Outer	2A	27/10 - 09/11	Hydorgen Peroxide	55700
		04/12 - 15/12	Hydrogen Peroxide	54000

2011	Marine Harvest			
Site	Area	Date	Product	Amount (litres)
Cairidh	11B	12/19/2011	Hydrogen Peroxide	2580
		12/19/2011	Hydrogen Peroxide	2750
		12/20/2011	Hydrogen Peroxide	2838
		12/20/2011	Hydrogen Peroxide	3010
		12/20/2011	Hydrogen Peroxide	1505
		12/20/2011	Hydrogen Peroxide	3010
		12/20/2011	Hydrogen Peroxide	3010
		12/20/2011	Hydrogen Peroxide	3010
		12/21/2011	Hydrogen Peroxide	3010
		12/21/2011	Hydrogen Peroxide	3010
		12/21/2011	Hydrogen Peroxide	3010
		12/21/2011	Hydrogen Peroxide	3010
		12/23/2011	Hydrogen Peroxide	3010
		12/23/2011	Hydrogen Peroxide	3010
		12/23/2011	Hydrogen Peroxide	3010
		12/23/2011	Hydrogen Peroxide	3010

Full file [online here]

2010	Marine Harvest							
Site	Area	FKB No.	Date	Time	Time End	Duration	Product	Amount
Meavaig	5B	FKB/W16	6/14/2010	8.35	9.05	12 mins	Hydrogen Peroxide (50%)	1325 ltrs
			6/14/2010	8.45	9.15	12 mins	Hydrogen Peroxide (50%)	1325 ltrs
			6/14/2010	12.30	13.00	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/14/2010	12.40	13.10	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/14/2010	15.45	16.15	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/14/2010	15.55	16.25	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/14/2010	19.15	19.45	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/14/2010	19.25	19.55	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/14/2010	23.55	0.25	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	0.02	0.32	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	3.45	4.15	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	3.53	4.23	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	7.02	7.32	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	7.10	7.40	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	13.50	14.20	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/15/2010	14.00	14.30	12 mins	Hydrogen Peroxide (50%)	1400 ltrs

Noster	5B	FKB/W17	6/19/2010	0.30	1.03	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
A22			6/19/2010	0.36	0.45	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	1.05	1.38	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	4.43	5.16	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	4.49	5.22	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	11.45	12.18	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	11.52	12.25	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	15.26	15.59	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	15.33	16.06	12 mins	Hydrogen Peroxide (50%)	1425 ltrs
			6/19/2010	18.54	19.26	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/19/2010	19.00	19.30	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/19/2010	22.35	23.05	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/19/2010	22.41	23.11	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/20/2010	1.47	2.18	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/20/2010	1.54	2.46	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/20/2010	5.00	5.30	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/20/2010	5.05	8.35	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/20/2010	8.22	8.55	12 mins	Hydrogen Peroxide (50%)	1400 ltrs
			6/20/2010	8.27	9.00	12 mins	Hydrogen Peroxide (50%)	1400 ltrs

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The FOI reply also disclosed dozens of licences issued by Marine Scotland for discharge of used chemicals from wellboats:

marinescotland

The Scottish Government

T:+44 (0)1224 295579 F: +44 (0)1224 295524
E: MS.MarineLicensing@scotland.gsi.gov.uk

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

LICENCE FOR DISCHARGE OF USED CHEMICALS FROM WELLBOATS

The licence conditions included:

Part 2 - Conditions

1. The licensee shall notify the licensing authority, at least two working days in advance of starting the operation, with the date and time of commencement of all operations undertaken under the authority of this licence and the product name and quantity of chemical(s) or agent(s) intended for discharge. Details of chemical(s) or agent(s) discharged must also be recorded and reported in accordance with Condition 10 of the licence.

2. The treatment of fish should be carried out in such a way as to minimise the discharge of chemical(s) or agent(s).

3. "*Force majeure*" may apply when, due to stress of weather or any other cause, it is necessary to discharge the chemicals or agents at a location other than that specified in Part 1 of the Schedule because the safety of human life, or a vessel or vehicle, is threatened. If chemicals or agents are discharged in an unauthorised area, full details of the circumstances must be immediately notified to the licensing authority. (See also notes appended to the Schedule).

4. Under the authority of this licence, the discharge of chemical(s) or agent(s) is only permitted if the location described in Part 1, section 4 of the Schedule is an operational and stocked fish farm. Furthermore, the said discharge is only permitted in respect of the treatment of fish being reared at the fish farm site at the location described in Part 1, section 4 of the Schedule, at the time of discharge.

5. No dead fish must be discharged to the water environment at any time. Any dead fish should be disposed of above the Mean High Water Springs in an appropriate manner.

6. Works must only be carried out in accordance with the Treatment Procedure (dated 18 December 2012) as provided with the application and Marine Scotland Licensing Operations Team (MS-LOT) must be informed if alterations are made to the treatment procedure. Copies of the treatment procedure must be kept with copies of the licence.

7. Only those chemicals or agents described in Part 1, section 5 of the Schedule (the authorised deposits) must be discharged under authority of the licence and all associated tank/hopper washings must be discharged at the location(s) specified in Part 1, section 4 of the Schedule.

8. The method of discharge must be:

   Pumped discharge via pipe/hatches from Wellboat at a depth of surface to 2 metres below sea surface.

Moreover:

12. The applicant must ensure that:

   a) subject to condition 12 b), the total quantity of cypermethrin as contained in the trade product Excis, discharged in any consecutive 3 hour period beginning at the time of the first release of Excis as part of any specific treatment, must not exceed 21.93 grams (this is equivalent to 2193 millilitres of Excis).

   b) Cypermethrin, as contained in the trade product Excis, must not be discharged if deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or

as ALPHA MAX™ marketed by Pharmaq AS, has been discharged at the premises in the previous 3 hours.

13. The total quantity of azamethiphos, as contained in the trade product Salmosan, discharged in any consecutive 24 hour period beginning at the time of the first release of Salmosan as part of any specific treatment, must not exceed 342.6 grams (this is equivalent to 685.2 grams of Salmosan).

14. The applicant must ensure that:

    a) subject to condition 14 b), the total quantity of deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, discharged in any consecutive 3 hour period beginning at the time of the first release of deltamethrin, formulated as AMX™ 10 mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, as part of any specific treatment must not exceed 8.22 grams (this is equivalent to 822.38 millilitres of AMX™ or ALPHA MAX™).

    b) Deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, must not be discharged if cypermethrin, as contained in the trade product Excis, has been discharged at the premises in the previous 3 hours.

15. Hydrogen peroxide may be discharged at any time provided its actual use is recorded and reported in accordance with Part 2, section 10 of this licence.

Dozens of wellboats authorized for discharge of toxic chemicals to Scottish waters include:

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Grieg Seafood Shetland Ltd** sites.

06132/16/0	11 December 2019
06131/17/0	11 December 2019
06130/16/0	17 November 2019
06129/16/0	11 December 2019
06128/16/0	11 December 2019
06126/17/1	16 November 2019
06125/16/0	20 November 2019
06124/16/0	20 November 2019
06123/16/0	17 November 2019
06122/17/0	17 November 2019
06121/16/0	11 December 2019
06107/16/0	18 December 2019
06032/16/0	01 March 2020
06031/16/0	20 November 2019
06029/16/0	11 December 2019
05224/17/1	03 August 2017
06575/18/0	22 February 2021
06714/18/0	31 May 2021

Vessel Name	IMO	Flag
Ronja Harvester	*9392547*	*Norway*
Ronja Polaris	*9657765*	*Norway*
Ronja Settler	*9258703*	*UK*
Ronja Nordic	*9443695*	*Norway*
Ronja Superior	*9421881*	*Norway*
Ronja Carrier	*9282845*	*Canada*
Ronja Austral	*9229465*	*Chile*
Ronja Commander	*9276183*	*Norway*
Ronja Viking	*9364100*	*Norway*
Ronja Pioneer	*9345520*	*Norway*
Ronja Skye	*9245926*	*Norway*
Ronja Diamond	*9814947*	*Norway*
Froyhav		
Froyfisk		
Inter Caledonia	*9745756*	*Norway*
Viking Atlantic	*9167954*	*Norway*
Viking Caledonia	*9125188*	*UK*
Viking Viknes	*9139658*	*UK*
Roy Kristian	*9237691*	*Canada*
Ronja Atlantic	*9451583*	*Chile*
Ronja Pacific		

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Scottish Sea Farms** sites.

- 06384/17/1 29 August 2020
- 06383/17/0 29 August 2020
- 06381/17/0 29 August 2020
- 06380/17/0 29 August 2020
- 06378/17/0 29 August 2020
- 06377/17/0 09 August 2020
- 06379/17/0 09 August 2020
- 06382/17/0 09 August 2020
- 06385/17/0 09 August 2020
- 06386/17/0 09 August 2020
- 06332/17/0 18 May 2020
- 06267/17/0 04 April 2020
- 06203/17/0 25 May 2020
- 06095/16/0 19 Dec 2019
- 05857/16/0 20 April 2019
- 05856/16/0 20 April 2019
- 05855/16/0 20 April 2019
- 05654/16/1 19 Jan 2019
- 05612/15/0 21 Jan 2019
- 05361/15/0 22 June 2018
- 06617/18/0 04 June 202
- 06620/18/0 04 June 202
- 06622/18/0 04 June 202
- 06624/18/0 04 June 202

Vessel Name	IMO	Flag
Froyfisk		
Froyhav		
Gripfisk	*9158642*	*Norway*
Migdale	*9220589*	*Norway*
Northolm	*9139567*	*UK*
Oylaks		
Ronja Atlantic	*9451563*	*Chile*
Ronja Commander	*9276183*	*Norway*
Ronja Harvester	*9392547*	*Norway*
Ronja Nordic	*9443695*	*Norway*
Ronja Pacific		
Ronja Settler	*9258703*	*UK*
Ronja Superior	*9421881*	*Norway*
Ronja Carrier	*9282845*	*Canada*
Ronja Viking	*9364100*	*Norway*
Ronja Pioneer	*9345520*	*Norway*
Ronja Skye	*9245926*	*Norway*
Ronja	*9165475*	*Canada*
Roy Kristian	*9237591*	*Canada*
Viktoria Lady	*9369849*	*Norway*
Viktoria Viking	*9521801*	*Norway*

ANNEX ONE

Vessels authorised to be used for the discharge of used sealice treatment chemicals at licensed **The Scottish Salmon Company** sites under the following licences:

1.	05443/17/0	27 May 2018
2.	05950/17/0	18 December 2019
3.	06198/17/0	25 May 2020
4.	06199/17/0	08 June 2020
5.	06200/17/0	25 May 2020
6.	06201/17/0	25 May 2020
7.	06202/17/0	25 May 2020
8.	06214/17/1	29 March 2020
9.	06216/17/1	29 March 2020
10.	06218/17/1	29 March 2020
11.	06219/17/1	29 March 2020
12.	06307/17/0	20 July 2020
13.	06340/17/0	13 August 2020
14.	06399/17/0	23 August 2020
15.	06368/17/1	28 August 2020
16.	06394/17/1	28 August 2020
17.	06402/17/0	28 August 2020
18.	06440/17/0	28 August 2020
19.	06363/17/0	29 August 2020
20.	06364/17/0	29 August 2020
21.	06365/17/0	29 August 2020
22.	06367/17/0	07 September 2020
23.	06372/17/0	07 September 2020
24.	06395/17/0	07 September 2020
25.	06401/17/0	07 September 2020
26.	06460/17/0	12 September 2020
27.	06369/17/0	17 September 2020
28.	06376/17/0	25 September 2020
29.	06443/17/0	25 September 2020
30.	06370/17/0	01 October 2020
31.	06373/17/0	01 October 2020
32.	06397/17/0	09 October 2020
33.	06463/17/0	22 October 2020
34.	06464/17/0	22 October 2020
35.	06459/17/0	23 October 2020
36.	06508/17/0	29 October 2020
37.	06462/17/0	29 October 2020
38.	06396/17/0	29 October 2020
39.	06512/17/0	09 November 2020
40.	06366/17/0	13 November 2020
41.	06371/18/0	18 January 2021
42.	06590/18/0	18 April 2021

Vessel Name	**IMO**	**Flag**
Viktoria Viking	9521801	Norway
Viktoria Lady	9369849	Norway
Norholm	9139567	UK
Ronja Viking	9364100	Norway
Ronja Nordic	9443695	Norway
Ronja Pioneer	9345520	Norway
Viking Atlantic	9167954	Norway
Ronja Supporter	9775359	Norway
Robris	9204544	Norway
Ronja Settler	9258703	UK
Viking Gripfisk	9158642	Norway
Rostein	9220665	Norway
Rohav	9220677	Norway
Sordyroy	6700652	Norway

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Loch Duart Ltd** sites.

a) Ronja Commander

b) Ronja Pioneer

c) Ronja Challenger

d) Inter Caledonia

e) Migdale

f) Viking Atlantic

g) Solundoy

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Marine Harvest (Scotland) Ltd** sites.

a) Inter Caledonia

b) Ronja Atlantic

c) Ronja Challenger

d) Ronja Commander

e) Ronja Nordic

f) Ronja Pioneer

g) Ronja Settler

h) Ronja Superior

i) Ronja Skye

j) Ronja Viking

k) Victoria Viking

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Cooke Aquaculture Scotland Ltd** sites.

a) Viktoria Viking

b) Victoria Lady

c) Rofisk

Data disclosed by SEPA on 19 July 2017 (via F:0187827):

Wellboats - Treatments 2016.xls

2016	The Scottish Salmon Company				Confirmed on 03/03/2017	
Site	Ref No.	Date	Time	Duration	Chemical/Agent	Amount
Outer Eport	04567	23/11/2016	11:00	60 mins	Salmosan (Azamethiphos)	296g
Outer Eport	04567	25/11/2016	11:45	60 mins	Salmosan (Azamethiphos)	296g
Scadabay	05383	14/05/2016	21:30	60 mins	Salmosan (Azamethiphos)	200g
Scadabay	05383	18/05/2016	21:30	60 mins	Salmosan (Azamethiphos)	200g
Scadabay	05383	28/05/2016	18:00	60 mins	Salmosan (Azamethiphos)	200g
Scadabay	05383	05/11/2016	15:00	60 mins	Salmosan (Azamethiphos)	200g
Greanamul	05180	01/10/2016	11:06	16 mins	Salmosan (Azamethiphos)	100g

2016	Scottish Sea Farms		Confirmed on 07/02/2017			
Site	Ref No.	Date	Time	Duration	Chemical/Agent	Amount
Spelve B	05425	24/05/2016	09:37	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	24/05/2016	09:37	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	24/05/2016	09:37	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	24/05/2016	13:10	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	24/05/2016	13:10	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	24/05/2016	13:10	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	24/05/2016	16:45	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	24/05/2016	16:45	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	24/05/2016	16:45	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	24/05/2016	20:10	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	24/05/2016	20:10	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	24/05/2016	20:10	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	25/05/2016	09:20	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	25/05/2016	09:20	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	25/05/2016	09:20	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	25/05/2016	13:20	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	25/05/2016	13:20	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	25/05/2016	13:20	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	25/05/2016	16:47	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	25/05/2016	16:47	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	25/05/2016	16:47	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	25/05/2016	20:06	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	25/05/2016	20:06	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	25/05/2016	20:06	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	26/05/2016	09:50	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	26/05/2016	09:50	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	26/05/2016	09:50	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	26/05/2016	13:15	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	26/05/2016	13:15	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	26/05/2016	13:15	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	26/05/2016	16:50	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	26/05/2016	16:50	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	26/05/2016	16:50	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	26/05/2016	20:15	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	26/05/2016	20:15	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	26/05/2016	20:15	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	27/05/2016	09:20	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	27/05/2016	09:20	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	27/05/2016	09:20	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	27/05/2016	12:30	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	27/05/2016	12:30	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	27/05/2016	12:30	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	27/05/2016	15:55	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	27/05/2016	15:55	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	27/05/2016	15:55	20 mins	Hydrogen Peroxide	924 lts
Spelve B	05425	27/05/2016	19:10	20 mins	Salmosan (Azamethiphos)	20 g
Spelve B	05425	27/05/2016	19:10	20 mins	Azasure (Azamethiphos)	100 g
Spelve B	05425	27/05/2016	19:10	20 mins	Hydrogen Peroxide	924 lts

Grunna Voe	05245	15/11/2016	08:15	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	15/11/2016	12:30	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	16/11/2016	09:00	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	16/11/2016	13:25	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	19/11/2016	08:15	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	19/11/2016	12:15	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	20/11/2016	08:00	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	20/11/2016	12:20	30 mins	Hydrogen Peroxide	1018 L
Grunna Voe	05245	21/11/2016	07:50	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	16/11/2016	17:30	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	16-17/11/2016	23:15	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	18/11/2016	08:00	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	19/2016	17:50	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	19-20/11/2016	22:30	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	21/22/2016	22:00	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	22/11/2016	08:00	30 mins	Hydrogen Peroxide	1018 L
Loura Voe	0542	22/11/2016	13:15	30 mins	Hydrogen Peroxide	1018 L
Lismore North	05360	29/06/2016	16:45	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North	05360	29/06/2016	16:45	20 mins	Hydrogen Peroxide	462 lts
Lismore North	05360	30/06/2016	08:38	20 mins	Salmosan (Azamethiphos)	120 g
Lismore North	05360	30/06/2016	08:38	20 mins	Hydrogen Peroxide	924 lts
Lismore North	05360	30/06/2016	11:28	20 mins	Salmosan (Azamethiphos)	120 g
Lismore North	05360	30/06/2016	11:28	20 mins	Hydrogen Peroxide	924 lts
Lismore North	05360	30/06/2016	14:27	20 mins	Salmosan (Azamethiphos)	120 g
Lismore North	05360	30/06/2016	14:27	20 mins	Hydrogen Peroxide	924 lts
Lismore North	05360	30/06/2016	17:05	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North	05360	30/06/2016	17:05	20 mins	Hydrogen Peroxide	462 lts
Lismore North	05360	30/06/2016	19:20	20 mins	Salmosan (Azamethiphos)	120 g
Lismore North	05360	30/06/2016	19:20	20 mins	Hydrogen Peroxide	924 lts
Lismore North	05360	30/06/2016	21:45	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North	05360	30/06/2016	21:45	20 mins	Hydrogen Peroxide	462 lts
Lismore North	05360	01/07/2016	09:45	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North	05360	01/07/2016	09:45	20 mins	Hydrogen Peroxide	462 lts
Lismore North	05360	01/07/2016	09:45	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North	05360	01/07/2016	09:45	20 mins	Hydrogen Peroxide	462 lts
Nevis C	05422	13/12/2016	09:00	20 mins	Hydrogen Peroxide	640 lts
Nevis C	05422	13/12/2016	12:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	13/12/2016	15:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	14/12/2016	07:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	14/12/2016	10:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	14/12/2016	13:00	20 mins	Hydrogen Peroxide	640 lts
Nevis C	05422	14/12/2016	15:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	15/12/2016	07:00	20 mins	Hydrogen Peroxide	640 lts
Nevis C	05422	15/12/2016	10:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	15/12/2016	13:00	20 mins	Hydrogen Peroxide	320 lts
Nevis C	05422	15/12/2016	16:00	20 mins	Hydrogen Peroxide	320 lts
Bellister	05243	25/11/2016	08:00	120 mins	Azasure (Azamethiphos)	200 g
Bellister	05243	25/11/2016	11:00	120 mins	Azasure (Azamethiphos)	200 g
Bellister	05243	25/11/2016	14:00	120 mins	Azasure (Azamethiphos)	200 g
Bellister	05243	26/11/2016	08:00	120 mins	Azasure (Azamethiphos)	200 g
Bellister	05243	26/11/2016	11:00	120 mins	Azasure (Azamethiphos)	200 g
Bellister	05243	26/11/2016	14:00	120 mins	Azasure (Azamethiphos)	200 g
Bellister	05243	26/11/2016	08:00	120 mins	Hydrogen Peroxide	2036 L
Bellister	05243	26/11/2016	11:00	120 mins	Hydrogen Peroxide	2036 L
Bellister	05243	26/11/2016	14:00	120 mins	Hydrogen Peroxide	2036 L
Bellister	05243	25/11/2016	08:00	120 mins	Hydrogen Peroxide	2036 L
Bellister	05243	25/11/2016	11:00	120 mins	Hydrogen Peroxide	2036 L
Bellister	05243	25/11/2016	14:00	120 mins	Hydrogen Peroxide	2036 L
Lismore North DS	05353	28/06/2016	11:48	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North DS	05353	28/06/2016	11:48	20 mins	Hydrogen Peroxide	462 lts
Lismore North DS	05353	28/06/2016	14:45	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North DS	05353	28/06/2016	14:45	20 mins	Hydrogen Peroxide	462 lts
Lismore North DS	05353	28/06/2016	17:46	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North DS	05353	28/06/2016	17:46	20 mins	Hydrogen Peroxide	462 lts
Lismore North DS	05353	29/06/2016	09:09	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North DS	05353	29/06/2016	09:09	20 mins	Hydrogen Peroxide	462 lts
Lismore North DS	05353	29/06/2016	11:37	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North DS	05353	29/06/2016	11:37	20 mins	Hydrogen Peroxide	462 lts
Lismore North DS	05353	29/06/2016	12:24	20 mins	Salmosan (Azamethiphos)	60 g
Lismore North DS	05353	29/06/2016	12:24	20 mins	Hydrogen Peroxide	462 lts
Toyness	04680	15/11/2016	12:32	20 mins	Hydrogen Peroxide	1300 ltr
Toyness	04680	15/11/2016	17:09	20 mins	Hydrogen Peroxide	1100 ltr

2016	Grieg Seafood Ltd		Confirmed on 03/02/2017			
Site	Ref No.	Date	Time	Duration	Chemical/Agent	Amount
Setterness North	04904	24/06/2016	17:10:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	25/06/2016	11:50:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	25/06/2016	17:00:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	25/06/2016	21:40:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	26/06/2016	10:50:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	26/06/2016	15:50:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	26/06/2016	20:25:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	27/06/2016	09:52:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	27/06/2016	14:50:00	20 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	12/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	13/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	13/07/2016		30 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	13/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	14/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	14/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	14/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	15/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	15/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	15/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	16/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	16/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	16/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	17/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	17/07/2016		30 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	17/07/2016		30 mins	Salmosan (Azamethiphos)	150g
Setterness North	04904	06/08/2016		20 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	06/08/2016		20 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	09/08/2016		20 mins	Salmosan (Azamethiphos)	300g
Setterness North	04904	09/08/2016		20 mins	Salmosan (Azamethiphos)	100g
Setterness North	04904	09/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	10/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	10/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	10/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	10/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	11/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	11/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	11/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	12/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	12/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	13/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	13/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	14/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	14/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	15/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	15/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	16/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	16/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	16/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	17/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	17/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	17/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	18/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	18/08/2016		20 mins	Salmosan (Azamethiphos)	200g
Setterness North	04904	18/08/2016		20 mins	Salmosan (Azamethiphos)	100g
Gob Na Hoe	04905	29/08/2016	14:40:00	20 mins	Salmosan (Azamethiphos)	600g
Gob Na Hoe	04905	29/08/2016	17:45:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	30/08/2016	14:10:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	30/08/2016	18:45:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	31/08/2016	12:09:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	31/08/2016	15:38:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	01/09/2016	16:26:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	01/09/2016	11:45:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	02/09/2016	11:20:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	02/09/2016	15:30:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	02/09/2016	20:00:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	03/09/2016	11:40:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	03/09/2016	16:36:00	20 mins	Salmosan (Azamethiphos)	300g

Gob Na Hoe	04905	03/09/2016	21:19:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	04/09/2016	12:28:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	04/09/2016	16:35:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	04/09/2016	20:40:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	05/09/2016	19:00:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	10/09/2016	12:48:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	10/09/2016	17:03:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	11/09/2016	12:43:00	20 mins	Salmosan (Azamethiphos)	300g
Gob Na Hoe	04905	12/09/2016	17:03:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	25/08/2016	11:40:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	25/08/2016	16:40:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	25/08/2016	21:00:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	26/08/2016	12:16:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	26/08/2016	15:47:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	26/08/2016	20:16:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	27/08/2016	11:56:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	27/08/2016	15:47:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	27/08/2016	11:35:00	20 mins	Salmosan (Azamethiphos)	300g
Leinish	04906	27/08/2016	14:57:00	20 mins	Salmosan (Azamethiphos)	300g

South of Linga	05223	04/09/2016		30 mins	Hydrogen Peroxide	4500 L
South of Linga	05223	04/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	05/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	05/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	05/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	05/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	06/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	07/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	07/09/2016		30 mins	Hydrogen Peroxide	4650 L
South of Linga	05223	07/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	07/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	07/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	08/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	08/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	08/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	08/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	09/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	09/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	09/09/2016		30 mins	Hydrogen Peroxide	4650 L
Setterness South	04908	09/09/2016		30 mins	Hydrogen Peroxide	4650 L

Bright of Foraness	04909	07/09/2016		30 mins	Hydrogen Peroxide	5600.000

2016 **Marine Harvest** Confirmed on 25/04/2017

Site	MCMS No.	Date	Time	Duration	Product	Amount
Tabhaigh	05656	20/01/2016		60 mins	Salmosan/-Vet (Azameth active)	400g
Tabhaigh	05656	20/01/2016		60 mins	Hydrogen Peroxide	6500L
Tabhaigh	05656	21/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	21/01/2016		60 mins	Hydrogen Peroxide	7500L
Tabhaigh	05656	21/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	21/01/2016		60 mins	Hydrogen Peroxide	6619L
Tabhaigh	05656	22/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	22/01/2016		60 mins	Hydrogen Peroxide	6553L
Tabhaigh	05656	23/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	23/01/2016		60 mins	Hydrogen Peroxide	7601L
Tabhaigh	05656	25/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	25/01/2016		60 mins	Hydrogen Peroxide	7863L
Tabhaigh	05656	26/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	26/01/2016		60 mins	Hydrogen Peroxide	7805L
Tabhaigh	05656	28/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	28/01/2016		60 mins	Hydrogen Peroxide	7797L
Tabhaigh	05656	29/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	29/01/2016		60 mins	Hydrogen Peroxide	7688L
Tabhaigh	05656	30/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
Tabhaigh	05656	30/01/2016		60 mins	Hydrogen Peroxide	7500L

North Shore West	05662	20/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	20/01/2016		60 mins	Hydrogen Peroxide	7250L
North Shore West	05662	21/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	21/01/2016		60 mins	Hydrogen Peroxide	6706L
North Shore West	05662	23/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	23/01/2016		60 mins	Hydrogen Peroxide	7524L
North Shore West	05662	24/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	24/01/2016		60 mins	Hydrogen Peroxide	7898L
North Shore West	05662	25/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	25/01/2016		60 mins	Hydrogen Peroxide	7627L
North Shore West	05662	27/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	27/01/2016		60 mins	Hydrogen Peroxide	8000L
North Shore West	05662	28/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	28/01/2016		60 mins	Hydrogen Peroxide	7761L
North Shore West	05662	29/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore West	05662	29/01/2016		60 mins	Hydrogen Peroxide	7550L

North Shore East	05660	22/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	22/01/2016		60 mins	Hydrogen Peroxide	7603L
North Shore East	05660	23/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	23/01/2016		60 mins	Hydrogen Peroxide	7493L
North Shore East	05660	24/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	24/01/2016		60 mins	Hydrogen Peroxide	7863L
North Shore East	05660	26/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	26/01/2016		60 mins	Hydrogen Peroxide	7313L
North Shore East	05660	27/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	27/01/2016		60 mins	Hydrogen Peroxide	8000L
North Shore East	05660	28/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	28/01/2016		60 mins	Hydrogen Peroxide	7665L
North Shore East	05660	30/01/2016		60 mins	Salmosan/-Vet (Azameth active)	440g
North Shore East	05660	30/01/2016		60 mins	Hydrogen Peroxide	7515L

Geshornish	06005	04/02/2016	11:30:00	40 mins	Salmosan/-Vet (Azameth active)	400g
Geshornish	06005	04/02/2016	11:30:00	40 mins	Hydrogen Peroxide	3500L
Geshornish	06005	05/02/2016	12:20:00	40 mins	Salmosan/-Vet (Azameth active)	400g
Geshornish	06005	05/02/2016	12:20:00	40 mins	Hydrogen Peroxide	3500L
Greshornish	06005	08/08/2016 - 11/08/2016			Salmosan/-Vet (Azameth active)	825g
Greshornish	06005	18/08/2016 - 21/08/2016			Salmosan/-Vet (Azameth active)	825g

West Loch Tarbert	06015	23/02/2016 - 25/02/2016			Salmosan/-Vet (Azameth active)	980g
West Loch Tarbert	06015	23/02/2016 - 25/02/2016			Hydrogen Peroxide	9300L

Raineach	05884	16/04/2016 - 29/04/2016			Salmosan/-Vet (Azameth active)	2160g

Stulaigh	05968	08/07/2016	14:05:00	30 mins	Salmosan/-Vet (Azameth active)	400g
Stulaigh	05968	09/07/2016	12:12:00	30 mins	Salmosan/-Vet (Azameth active)	400g
Stulaigh	05968	09/07/2016	17:23:00	30 mins	Salmosan/-Vet (Azameth active)	400g
Stulaigh	05968	09/07/2016	13:16:00	30 mins	Salmosan/-Vet (Azameth active)	400g
Stulaigh	05968	12/07/2016	12:40:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	12/07/2016	16:55:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	13/07/2016	12:44:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	13/07/2016	17:07:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	14/07/2016	12:48:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	14/07/2016	18:21:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	15/07/2016	13:21:00	30 mins	Salmosan/-Vet (Azameth active)	500g
Stulaigh	05968	15/07/2016	20:05:00	30 mins	Salmosan/-Vet (Azameth active)	500g

West Loch Tarbert (Soay)	06015	28/06/2016 - 02/07/2016			Salmosan/-Vet (Azameth active)	1750g
West Loch Tarbert (Soay)	06015	08/09/2016 - 11/09/2016			Paramove 50 (Perox active)	10500L
West Loch Tarbert (Soay)	06015	19/10/2016 - 02/11/2016			Salmosan/-Vet (Azameth active)	3320g
West Loch Tarbert (Soay)	06015	19/10/2016 - 02/11/2016			Paramove 50 (Perox active)	12100L

Carradale South (Eilean Grianain)	05747	21/07/2016 - 30/07/2016			Salmosan/-Vet (Azameth active)	700g
Carradale South (Eilean Grianain)	05747	11/10/2016 - 14/10/2016			Paramove 50 (Perox active)	16850L
Carradale South (Eilean Grianain)	05747	09/10/2016			Salmosan/-Vet (Azameth active)	100grams

Carradale North	05869	21/07/2016 - 30/07/2016			Salmosan/-Vet (Azameth active)	2700g
Carradale North	05869	09/10/2016 - 11/10/2016			Salmosan/-Vet (Azameth active)	500g
Carradale North	05869	10/10/2016 to 17/10/2016			Paramove 50 (Perox active)	18400L

Groatay (Cheesebay)	04794	04/07/2016 - 15/07/2016			Salmosan/-Vet (Azameth active)	2440g

Grey Horse Channel	04796	03/07/2016 - 09/07/2016			Salmosan/-Vet (Azameth active)	1540g
Grey Horse Channel	04796	9/2/2016 to 11/2/2016			Paramove 50 (Perox active)	28729L

(East) Scotasay	04787	18/06/2016 - 19/06/2016			Salmosan/-Vet (Azameth active)	400g
(East) Scotasay	06017	01/08/2016 - 16/08/2016			Salmosan/-Vet (Azameth active)	945g
(East) Scotasay	06017	22/09/2016 - 28/09/2016			Salmosan/-Vet (Azameth active)	900g
Raineach	05884	18/06/2016			Salmosan/-Vet (Azameth active)	200g
Raineach	05884	01/08/2016 - 16/08/2016			Salmosan/-Vet (Azameth active)	1620g
Colonsay	05998	30/07/2016 - 05/08/2016			Salmosan/-Vet (Azameth active)	1200g
Colonsay	05998	30/07/2016 - 05/08/2016			Paramove 50 (Perox active)	20575L
Colonsay	05998	22/08/2016 - 26/08/2016			Salmosan/-Vet (Azameth active)	2530g
Marulaig Bay	06022	01/07/2016 - 02/07/2016			Salmosan/-Vet (Azameth active)	400g
Marulaig Bay	06022	30/08/2016 - 02/09/2016			Salmosan/-Vet (Azameth active)	1440g
Marulaig Bay	06022	02/09/2016 - 04/09/2016			Paramove 50 (Perox active)	6600L
Seaforth	06016	14/09/2016 - 28/09/2016			Salmosan/-Vet (Azameth active)	950g
Noster	06020	14/09/2016 to 28/09/2016			Salmosan/-Vet (Azameth active)	850g
Maclean's Nose	05635	27/11/2016 - 01/12/2016			Salmosan/-Vet (Azameth active)	990g
Kingairloch	06010	29/11/2016 - 06/12/2016			Salmosan/-Vet (Azameth active)	3200g
Linnhe	06024	10/12/2016 - 16/12/2016			Salmosan/-Vet (Azameth active)	4200g
Ardintoul	04804	15/08/2016 - 17/08/2016			Salmosan/-Vet (Azameth active)	1200g
Ardmaddy South	03850	04/01/2016 - 08/01/2016			AMX (Deltameth active)	33.1g
Ardmaddy South	03850	04/01/2016 - 08/01/2016			Paramove 50 (Perox active)	17260.5L
Bagh Dail Nan Cean	05887	14/12/2016	06:30:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Bagh Dail Nan Cean	05887	15/12/2016	08:01:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Bagh Dail Nan Cean	05887	16/12/2016	09:32:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Bagh Dail Nan Cean	05887	17/12/2016	11:03:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Bagh Dail Nan Cean	05887	18/12/2016	12:34:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Bagh Dail Nan Cean	05887	19/12/2016	19:05:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Bagh Dail Nan Cean	05887	20/12/2016	15:36:00	90 mins	Salmosan/-Vet (Azameth active)	340g
Gorsten	06004	07/12/2016 - 19/12/2016			Salmosan/-Vet (Azameth active)	2100g
Isle Ewe	04803	07/09/2016 - 14/09/2016			Paramove 50 (Perox active)	9210L
Port Na Cro	05886	09/05/2016			Salmosan/-Vet (Azameth active)	300g

Data disclosed by the Scottish Government on 20th February 2017 (via FOI/17/00034):

D4 - Wellboats - Treatments 2015.xls

D3 - Wellboats - Treatments 2014.xls

D2 - Wellboats 2013.xls

D6 - Wellboats - Treatments 2017.xls

D5 - Wellboats - Treatments 2016.xls

D1 - DATA from MSS - Peroxide 2010-13.x

Includes:

2015	Marine Harvest		Confirmed as up to date as of 01 March 2016			
Site	FKB No.	Date	Time	Duration	Product	Amount
Bagh Dail Nan Ceann		24/112015	11:18:00	72 mins	Deltamethrin	625ml
		24/11/2015	17:16:00	71 mins	Deltamethrin	625ml
		25/11/2015	12:19:00	62 mins	Deltamethrin	625ml
		25/11/2015	16:10:00	74 mins	Deltamethrin	625ml
		05/12/2015	13:32:00	69 mins	Deltamethrin	625ml
Poll Na Gille		26/11/2015	11:03:00	69 mins	Deltamethrin	625ml
		26/11/2015	11:03:00	69 mins	Azamethiphos	400g
Coalas East		15/06/2015	10:19:00	30 mins	deltamethrin	500ml
		15/06/2015	12:50:00	30 mins	deltamethrin	500ml
		15/06/2015	15:09:00	30 mins	deltamethrin	250ml
		15/06/2015	17:51:00	30 mins	deltamethrin	500ml
		15/06/2015	10:19:00	30 mins	Azamethiphos	200g
		15/06/2015	12:50:00	30 mins	Azamethiphos	200g
		15/06/2015	15:09:00	30 mins	Azamethiphos	100g
		15/06/2015	17:51:00	30 mins	Azamethiphos	200g

And:

2015	Scottish Sea Farms		Confirmed up to date as of 29 January 2016			
Site	FKB No.	Date	Time	Duration	Product	Amount
		20/11/2015	10:52	78 mins	Hydrogen Peroxide	550 litres
		20/11/2015	14:05	60 mins	Hydrogen Peroxide	550 litres
Fada		16/12/2015	10:30:00	20 mins	Hydrogen Peroxide	300 litres
		16/12/2015	11:45:00	20 mins	Hydrogen Peroxide	300 litres
		16/12/2015	14:00:00	20 mins	Hydrogen Peroxide	300 litres
Tanera 1		13/12/2015	10:38:00	20 mins	Hydrogen Peroxide	300 litres
		13/12/2015	11:45:00	20 mins	Hydrogen Peroxide	300 litres
		13/12/2015	14:00:00	20 mins	Hydrogen Peroxide	300 litres
		13/12/2015	16:00:00	20 mins	Hydrogen Peroxide	300 litres
		14/12/2015	10:30	20 mins	Hydrogen Peroxide	300 litres
		14/12/2015	11:45	20 mins	Hydrogen Peroxide	300 litres
Tanera 2		14/12/2015	14:00	20 mins	Hydrogen Peroxide	300 litres
		14/12/2015	16:00	20 mins	Hydrogen Peroxide	300 litres
		15/12/2015	10:30	20 mins	Hydrogen Peroxide	300 litres
		15/12/2015	11:45	20 mins	Hydrogen Peroxide	300 litres
		15/12/2015	14:00	20 mins	Hydrogen Peroxide	300 litres
		15/12/2015	16:00	20 mins	Hydrogen Peroxide	300 litres

And:

2014	The Scottish Salmon Company			Confirmed as up to date as of 06/01/2015		
Site	FKB No.	Date	Time	Duration	Product	Amount
Eughlam	W90	06/06/2014	13:49:00	31 mins	(Deltamethrin)	250 millilitres
		06/06/2014	15:13:00	30 mins	(Deltamethrin)	250 millilitres
		08/06/2014	10:30:00	30 mins	(Deltamethrin)	250 millilitres
		08/06/2014	11:24:00	30 mins	(Deltamethrin)	250 millilitres
		08/06/2014	08:34:00	30 mins	(Deltamethrin)	250 millilitres
		08/06/2014	13:26:00	30 mins	(Deltamethrin)	250 millilitres
Strone	W80	26/06/2014	14:21:00	30 mins	(Deltamethrin)	250 millilitres
Ardyne	W79	30/08/2014	05:20:00	30 mins	(Azamethiphos)	120 grams
		30/08/2014	06:20:00	30 mins	(Azamethiphos)	120 grams
		30/08/2014	10:50:00	30 mins	(Azamethiphos)	120 grams
		30/08/2014	11:21:00	30 mins	(Azamethiphos)	120 grams
		01/09/2014	11:53:00	30 mins	(Azamethiphos)	120 grams
		01/09/2014	12:25:00	30 mins	(Azamethiphos)	120 grams
		01/09/2014	15:55:00	30 mins	(Azamethiphos)	120 grams
		01/09/2014	16:30:00	30 mins	(Azamethiphos)	120 grams
		02/09/2014	17:10:00	30 mins	(Azamethiphos)	120 grams
		02/09/2014	17:50:00	30 mins	(Azamethiphos)	120 grams
		02/09/2014	21:25:00	30 mins	(Azamethiphos)	120 grams
		02/09/2014	22:10:00	30 mins	(Azamethiphos)	120 grams

And:

2013	Marine Harvest					
Site	FKB No.	Date	Time	Duration	Product	Amount
Groatay	W28	12/01/2013	11:22:00	30 mins	(Deltamethrin)	1000ml
		12/01/2013	14:55:00	30 mins	(Deltamethrin)	1000ml
Grey Horse Channel		12/01/2013			(Deltamethrin)	Notification Only
Kingairloch		15/01/2013	4.20 pm	40 mins	(Deltamethrin)	750ml
		16/01/2013	3.50pm	40 mins	(Deltamethrin)	375ml

Data disclosed by SEPA on 4 April 2018 (via F:0188595):

Response
Please find attached a spreadsheet detailing site specific use of hydrogen peroxide and antibiotics at salmon farms reported to SEPA for 2017.

Under the terms of Regulation 9 of the EIRs, SEPA has a duty to provide advice and assist. We advise that treatments carried out on well boats are reported to Marine Scotland.

180312-AntibioticH2O-2017.xlsx

i.e. data on Hydrogen Peroxide use via well boats is available from Marine Scotland and is not included in the SEPA data (or the Scotland's Aquaculture database?).

Data disclosed by the Scottish Government on 1st June 2018 (via a review of FoI/18/00985):

[Note that AMX is the trade name for Deltamethrin]

From: MS Marine Licensing
Sent: 26 June 2017 10:01
To: [Redacted]
Subject: RE: Marine Harvest Scotland notification

Dear [Redacted]

Thank you for notifying us with your intentions to conduct treatments in your site.
However, I will require the name and the marine licence number as well as the quantities that you will use during your operation.

As per condition 1 of your marine licence, the licensee shall notify the licensing authority, of this licence and the product name and quantity of chemical(s) or agent(s) intended for discharge. Details of chemical(s) or agent(s) discharged shall also be recorded and reported in accordance with Condition 10 of the licence.

Kind Regards
[Redacted]

Marine Licensing Officer
Marine Scotland - Marine Planning & Policy

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

Direct Line: [Redacted]
General Queries: +44 (0)1224 295 579
Fax: +44 (0)1224 295 524
Email: [Redacted]
Website: http://www.gov.scot/Topics/marine/Licensing/marine

From: [Redacted] @griegseafood.com>
Sent: 30 June 2017 14:26
To: MS Marine Licensing
Subject: North Voe Whalsay

Dear Sir / Madam,
Please accept this email as notification for wellboat treatment.
Vessel: Martin Saele.
Location: North Voe Whalsay.
To be discharged: Peroxide @ 6000 litres.
Start: 04.07.2017.
Finish: 05.07.2017.
I will forward eighter tomorrow or on Monday site license number because I am away from the office at the moment.
Regards, [Redacted]

From: [Redacted] @marineharvest.com]
Sent: 26 June 2017 08:53
To: MS Marine Licensing
Cc: [Redacted]
Subject: Marine Harvest Scotland notification

To whom it may concern,

Marine Harvest Scotland will be conducting wellboat treatments using salmosan at Loch Shell from 27th June 2017, within our SEPA consented allowance. Apologies for the short notice, unforeseen circumstances and the weather over the weekend has moved our plan forward.

Thank you
[Redacted]

From: [Redacted] @griegseafood.com]
Sent: 20 March 2017 08:36
To: MS Marine Licensing
Subject: Wellboat treatments, Gonfirth, Grieg SEafood Shetland

Dear Sir / Madam
Please accept this email as notification for upcoming wellboat treatments within Gonfirth Are / Shetland. Sites to be treated: East Of Papa Little and Coledeep. To be discharged: EOPL (05224/14/0): peroxide – 26000 litres, AMX: - 1620 ml. Coledeep (06107/16/0): peroxide – 33000 litres, AMX – 1980 ml. Wellboat: OYSUND. Original plan was to start on Friday but we have a chance to start this Wednesday instead.
Any further questions just let me know.
Best regards,[Redacted]

From: [Redacted] @griegseafood.com>
Sent: 22 May 2017 15:31
To: MS Marine Licensing
Cc: [Redacted]
Subject: wellboat notification EOPL, CD

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sir / Madam,
Please accept this email as notification for wellboat treatmetns. Wellboat: Oysund. Locations: East Of Papa Little (05224/14/0), Coledeep (06107/16/0).
Start date: 25.05.2017.
Finish date: 28.05.2017
To be discharged: East Of Papa Little: H2O2: 16000 litres, AMX: 1260 ml.
Coledeep: H2O2: 23000 litres, AMX: 1800 ml.
Best Regards[Redacted]

From: [Redacted] @griegseafood.com>
Sent: 15 September 2017 18:09
To: MS Marine Licensing
Cc: [Redacted]
Subject: Treatment notification

Dear Sir/Madam,

We wish to notify you of a wellboat discharge commencing Monday 18th at our production sites Leinish and Corlarach in Skye. The discharge will result from AGD treatments using Hydrogen Peroxide.

Best regards

[Redacted]

Seawater Production Manager
Grieg Seafood Shetland Ltd
[Redacted]

From: [Redacted] @griegseafood.com]
Sent: 15 March 2017 17:44
To: MS Marine Licensing
Subject: wellboat treatments notification Greig Seafood, Dunvegan

Dear Sir / Madam
Please accept this email as notification regarding upcoming treatments within Dunvegan Area. Sites to be treated and quantities to be discharged: Gob Na hoe – 06032/16/0 – peroxide estimated discharge: 11200 litres, AMX: 720 ml. Corlarach – 05258/14/0 – peroxide: 28000 litres, AMX: 1800 ml. Wellboat: OYSUND. Planning to start late hours on the 17.03.2017, more likely 18.03.2017 – first site to be treated is really weather depending, at the moment probably start at Gob Na Hoe. If you have any other questions please let me know.
Best regards, [Redacted]

From: [Redacted] @griegseafood.com]
Sent: 30 December 2016 10:17
To: MS FishHealth; MS Marine Licensing
Cc: [Redacted]
Subject: Wellboat treatment notification

Dear Sir / Madam,

Please accept this as notification of our intention to treat fish with a wellboat at our Corlarach site, Dunvegan, Skye commencing 4th January 2017.

In this case discharge of peroxide is approved under Marine License 05258/14/0, expiry Aug 2017.

The vessel being contracted in is the 'Martin Saele'. This vessel appears on our approved wellboat list as 'Lilly Johanne' but she was renamed prior to her launch just this month. Discharge will be within the consented coordinates as per the Marine Licence. The vessel however benefits from having sea lice filtration technology so we are keen to engage her.

From: [Redacted] @griegseafood.com]
Sent: 08 May 2017 16:02
To: MS Marine Licensing
Cc: [Redacted]
Subject: wellboat notification

Dear Sir / Madam,
Please accept this email as notification for wellboat treatment at Corlarach / Dunvegan Area / Skye.
Licence number: 0528/14/0
Wellboat: Oysund.
Chemicals to be discharged: Peroxide: 5500 litres + AMX: 360ml.
Start date: 11.05.2017
Finish date: 11.05.2017.
Regards,[Redacted]

From: [Redacted] @scottishseafarms.com]
Sent: 22 June 2017 16:15

Subject: RE: Wellboat treatment notification

Hi [Redacted]

The proposed quantities to be used are as follows:

Fishnish A – 1100g Azasure so 550 g Azamethiphos over 4 days with 10,164 ltrs Paramove 50 over same period.

Fishnish B – 900g Azasure so 450g Azamethiphios over 3 days with 8316 ltrs Paramove 50 over the same period.

Best wishes,

[Redacted]

Environment Team Leader
Scottish Sea Farms
South Shian
Connel
Argyll
PA37 1SB

From:[Redacted] @scottishseafarms.com]
Sent: 12 October 2017 12:56
To: MS Marine Licensing
Cc:[Redacted]
Subject: Puldrite - Wellboat treatment

Good Afternoon

This is a note to inform you of our intention to carry out a hydrogen peroxide treatment, using the wellboat 'Ronja Superior', at our Puldrite site (License: 05415/15/0) in Wide Firth, Orkney.

Treatment is due to start and finish on 13/10/17 and total volume of peroxide expected to be used is approx. 1,100L. Apologies for the late notice, we have been offered a last minute opportunity to use the wellboat.

Kind Regards
[Redacted]

Biomass Assessor | Scottish Sea Farms Ltd
[Redacted] @scottishseafarms.com
Orkney Regional Office, Scapa, Orkney, UK, KW15 1SD
T:[Redacted]
M:[Redacted]

From:[Redacted] @scottishseafarms.com]
Sent: 20 January 2017 09:56
To: MS Marine Licensing
Cc:[Redacted]
Subject: Notification of wellboat treatment

Dear Marine Scotland,

In preparing the medicines data for our Q4 return it has come to my attention that a wellboat treatment was carried out at Nevis C in December, and unfortunately this was not notified to Marine Scotland. Details are as follows:

Site name: Nevis C
Licence Ref: 05422/16/1
Wellboat name: NORHOLM
Agent: Hydrogen peroxide
Treatment date: 13-15/12/2016

Please accept our apologies for this oversight. I will shortly circulate an email around all site managers to remind them of the notifications procedure, to try and ensure that this does not happen again.

Many thanks & best wishes,

[Redacted]

From: [Redacted] @scottishseafarms.com]
Sent: 17 March 2017 15:48
To: MS Marine Licensing
Cc: [Redacted]
Subject: Wellboat treatment Nevis C

Dear Marine Scotland,

We intend to treat our Nevis C site (05422) with Peroxide and Salmosan start Saturday 18th March.

Apologies for the delay in notification this was due to an oversight on my part.

[Redacted] **Environmental Analyst | Scottish Sea Farms Limited**
South Shian, Connel, Argyll PA37 1SB
Tel[Redacted]

From: [Redacted] @marineharvest.com>
Sent: 14 August 2017 12:11
To: MS Marine Licensing
Cc: [Redacted]
Subject: RE: Marine Scotland - Licensing Operations Team

Hi,

I would like to notify you of our plan to treat fish at our farm at marine harvest, loch Erisort Tabhaigh (FS1297). We are planning to do some well boat treatments at tabhaigh using Salmosan.

Treatments will start on Thursday 17th August finishing on Sunday 20th . And we intend to use 1.8kg salmosan or 900g of active substance.

From: [Redacted] @kames.co.uk>
Sent: 12 September 2017 10:00
To: MS Marine Licensing
Cc: [Redacted]
Subject: Shuna South West - Wellboat Discharge Notification 05769/16/0 commencing 11.9.17

Please find below confirmation of the following wellboat treatment at Shuna South West further to notification yesterday.

Starting on Monday 11th September for 5 days.
Alphamax is the Therapeutant at 15grams per day with 75g total being used.
The biomass on site is 1725T
The quantity of Alphamax is 7.5 litres which is 30 bottles total over the treatment.

I understand you have also updated SEPA with regard to this, but should we need to do anything further would appreciate your confirmation.

From: [Redacted] @marineharvest.com]
Sent: 11 September 2017 16:26
To: MS Marine Licensing
Subject: RE: Notification of discharge of medicines at PNG CAR/L/1000800 (MHS)

Apologies for the very late request, but we are carrying out an Alphamax treatment starting today at South West Shuna for the next 5 days.

Kames will be sending the formal notification shortly but here is the information.

Starting on Monday 11th September for 5 days.
Alphamax is the Therapeutant at 15grams per day with 75g total being used.
The biomass on site is 1725T
The quantity of Alphamax is 7.5 litres which is 30 bottles total over the treatment.

Again apologies for the last minute notification.

Many thanks in advance.

Best regards

[Redacted]

Production Assistant
MARINE HARVEST SCOTLAND LTD

From: [Redacted]
Sent: 11 September 2017 16:10
To: 'MS.MarineLicensing@gov.scot'
Subject: RE: Notification of discharge of medicines at PNG CAR/L/1000800 (MHS)

Apologies for the confusion, this treatment has now been changed to Alphamax and will be within SEPA discharge consent quantities please accept this notification, treatment is urgent and cannot be delayed to prevent an increase in sea lice numbers.

Official notification will come through Kames as per usual, fish are on South West Shuna site and discharge will take place on South West Shuna site.

Best regards

[Redacted]

Production Assistant
MARINE HARVEST SCOTLAND LTD

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]
Sent: 11 September 2017 14:41
To: [Redacted]
Cc: [Redacted]
Subject: RE: Notification of discharge of medicines at PNG CAR/L/1000800 (MHS)

Hi [Redacted]

Thank you. Please note that the licence you sent through is for Shuna South West and is for Kames fish farming and not Marine Harvest. Additionally, I note that Sabina referred to a CAR licence at PNG. If a treatment is carried out the discharge of the chemicals must be at the site where the treatment was completes and not at another site.

Can you please confirm whether the you are treating and discharging at PNG or Shuna South West?

Many thanks
[Redacted]

From: [Redacted] @marineharvest.com>
Sent: 19 January 2017 21:05
To: epiwesthighlands-argyll@sepa.org.uk; MS Marine Licensing
Cc: [Redacted]
Subject: FW: Treatment notification Gorsten - correction
Attachments: SEPA Salmosan Gorsten 19012017.docx

Good morning,

It's just been brought to my attention that the treatment vessel will be Ronija Commander not the Inter-Caledonia as previously stated in my email.

With best regards
[Redacted]

From: [Redacted]
Sent: 19 January 2017 20:45
To: 'epiwesthighlands-argyll@sepa.org.uk'; 'registrydingwall@sepa.org.uk'; MS.MarineLicensing@scotland.gsi.gov.uk
Cc: [Redacted]
Subject: Treatment notification Gorsten

Good morning,

Marine Harvest Scotland intend to treat stock at Gorsten. Please find attached notification. Treatment will be carried out aboard the well-boat Inter-Caledonia.

Have a good weekend
[Redacted]

Health Manager
MARINE HARVEST SCOTLAND LTD

marineharvest

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

From: [Redacted]

[Redacted]

Email ms.marinelicensing@gov.scot

Marine Harvest (Scotland) Ltd.
Farms Office, Blar Mhor Industrial Estate
Fort William, PH33 7TP
Telephone [Redacted]
Mobile [Redacted]
Fax 01397 701 174

Date: 25th January 2017

We intend to discharge the following used chemical from the wellboat Inter Caledonia in compliance with licence conditions. Actual times of discharge are subject to weather and workload.

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Date	
				Start	End
Loch Hourn 06008/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	1760.00	0900hrs 27/01/2017	31/01/2017

From: [Redacted] @griegseafood.com]
Sent: 08 April 2017 10:54
To: MS Marine Licensing
Cc: MS FishHealth; [Redacted]
Subject: North Voe treatment planned 10th April

Dear Sir, Madam,

We have a narrow window of opportunity to treat our North Voe, Whalsay site. We would like to commence afternoon Monday 10th April.

Our treatment plan is:

Monday: 2 cages
Tuesday: 3 cages
Wednesday: 3 cages

We intend to use peroxide and AMX (label dose). Treatments will be carried out with the wellboat Martin Saele (1000m3 capacity).

Please let me know if there are any issues with our plan.

Regards

[Redacted]

From: [Redacted] @griegseafood.com]
Sent: 31 August 2017 15:19
To: MS Marine Licensing
Cc: [Redacted]
Subject: treatment notification North Voe Whalsay

Dear Sir / Madam,
Please accept this email as notification for North Voe Whalsay (06029/16/0) wellboat treatment.
Vessel: Martin Saele.
Start: 05.09.2017
Finish: 13.09.2017
To be discharged: Salmosan Vet: 3000 grams, H_2O_2: 21000 litres

P.S. regarding our previous notifications for Coledeep and East of Papa Little please note that we will not discharge any chemicals from the wellboat – we will just move some fish around (01.09.2017 and 02.09.2017) to allow lower biomasses for tarpaulins.

Best regards, [Redacted]

From: [Redacted] @griegseafood.com>
Sent: 30 October 2017 14:23
To: MS Marine Licensing
Subject: Coledeep discharge of Salmosan Vet

Dear Sir / Madam,
Please accept this email as notification regarding wellboat treatment activity at Coledeep site. Weather permitting on Wednesday (01.11.2017) more likely on Thursday (02.11.2017) we will discharge: Salmosan Vet: 300 grams. Wellboat: Martin Saele. Finish date: 03.11.2017. Coledeep licence number: 06107/16/0.
Regards,[Redacted]

From: [Redacted] @griegseafood.com]
Sent: 10 October 2017 15:16
To: MS Marine Licensing
Subject: notification Setterness Noth

Dear Sir, Madam,
I would like to apologise for the confusion. My notification regarding treatment at Setterness North site will be changed – instead of AMX we will discharge Salmosan Vet in amount of: 3000 grams total. Rest the same.
Regards,[Redacted]

From: [Redacted] @griegseafood.com]
Sent: 10 May 2017 15:19
To: MS Marine Licensing
Cc: [Redacted]
Subject: wellboat notifications Grieg Seafood Shetland

Dear Sir / Madam,
Please accept this email as notification for our wellboat treatments plan. At this stage (apologise) but it's not possible to give you 100% answer where we will start. It depends as always on the weather and our other treatments in progress at the moment.
Wellboat: Oysund.
Locations: West Of Burwick (06123/16/0) – start: 14.05.2017, finish: 16.05.2017.
Spoose Holm (06124/16/0) – start: 14.05.2017, finish: 15.05.2017.
Score Holms (06125/16/0) – start: 15.05.2017, finish: 19.05.2017.
Langa (06128/16/0) – start: 18.05.2017, finish: 21.05.2017.
To be discharged: West Of Burwick: Peroxide – 43000 litres, Salmosan Vet – 3060 grams.
Spoose Holm: Peroxide – 18000 litres, Salmosan Vet – 1260 grams.
Score Holms: Peroxide – 53000 litres, Salmosan Vet – 3580 grams.
Langa: Peroxide – 55000 litres, Salmosan Vet – 3960 grams.
If you have any questions just let me know and I'll try to help!

-----Original Message-----
From: [Redacted] @griegseafood.com]
Sent: 23 June 2017 12:36
To: MS Marine Licensing
Subject: WOB perox Wellboat MS

Dear Sir / Madam,
Please accept this email as notification for next week planned peroxide treatment onboard Martin Saele. Treatment start: 26.06.2017, Treatment finishing: 08.07.2017. Basically 2 wells treated per day. Estimated peroxide usage- 24000 litres. I'm not able to get site license number at the moment but it's West of Burwick in Scalloway Area.
Regards, [Redacted]

From: [Redacted] @griegseafood.com]
Sent: 10 April 2017 10:12
To: MS FishHealth; MS Marine Licensing
Cc: [Redacted]
Subject: Treatment notification

Dear Sir, Madam,

In response to change of weather forecast we have a narrow window of opportunity to utilise the wellboat Oysund for treatments commencing tomorrow 11th April at our West Burwick site, Scalloway.

We intend to treat 2 cages and use peroxide + Salmosan, well within consented quantities.

I apologise for the late notification but it will make a big difference to us operationally if we can take advantage of this unexpected downtime with the boat.

Regards

[Redacted]

From: [Redacted]
Sent: 12 January 2017 14:22
To: [Redacted]
Subject: RE: Wellboat treatment notification

Dear [Redacted]

Thank you for your email. However, would it be possible for you to be more specific? We need to know the amount of Salmosan that you will use per site and the number of days that you will be treating for, this is ok if it is the maximum number of days as an overestimate.

Kind regards,
[Redacted]

Marine Licensing Officer
Marine Scotland - Marine Planning & Policy

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

Direct Line: [Redacted]
General Queries: +44 (0)1224 295 579

From: MS Marine Licensing
Sent: 05 January 2017 16:24
To: [Redacted]
Subject: RE: North Havra Wellboat treatment notification

Dear [Redacted]

Thank you for this information. Apologies for the confusion, I was asking about the treatment time frame. Please note that your SEPA CAR consent is for 1189g/24 hours of Salmosan/Salmosan Vet.

Kind regards,
[Redacted]

Marine Licensing Officer
Marine Scotland - Marine Planning & Policy

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

Direct Line: [Redacted]
General Queries: +44 (0)1224 295 579
Fax: +44 (0)1224 295 524
Email: [Redacted]
Website: http://www.gov.scot/Topics/marine/Licensing/marine

From: [Redacted] @griegseafood.com]
Sent: 05 January 2017 10:35
To: MS Marine Licensing
Subject: RE: North Havra Wellboat treatment notification

Dear [Redacted]
We are planning to discharge 2400 g of Salmosan in total, within SEPA consent of 1040 g/24 hrs. Discharge time: to flush the wells is around 15 – 20 minutes if that's what you asking for, if you mean treatment time frame – we start on Saturday and we should finish on Wednesday 11.01.2017.
Regards, [Redacted]

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]
Sent: 05 January 2017 10:09
To: [Redacted] @griegseafood.com>
Subject: RE: North Havra Wellboat treatment notification

Dear [Redacted]

Thank you for your email. The Wellboat discharge licence is 06126/16/0. However, you have not told me the quantity of salmosan that you are planning to discharge and how long you will be discharging for. Please provide this information as soon as possible.

From: [Redacted] @griegseafood.com]
Sent: 05 January 2017 10:35
To: MS Marine Licensing
Subject: RE: North Havra Wellboat treatment notification

Dear [Redacted]
We are planning to discharge 2400 g of Salmosan in total, within SEPA consent of 1040 g/24 hrs. Discharge time: to flush the wells is around 15 – 20 minutes if that's what you asking for, if you mean treatment time frame – we start on Saturday and we should finish on Wednesday 11.01.2017.
Regards, [Redacted]

From: [Redacted] @griegseafood.com>
Sent: 15 May 2017 12:24
To: MS Marine Licensing
Subject: RE: North Havra wellboat notification

Hi [Redacted]
At the moment our plan is to do 5 cages on the first day and remaining 3 through the next day.
P.S. we had to stop right now our treatments at Score Holms because of the weather – hoping to get it started again tomorrow. In this case there might be actually 1 day delay to start at North Hvra.
Regards, [Redacted]

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]
Sent: 15 May 2017 12:06
To: [Redacted] @griegseafood.com>
Subject: RE: North Havra wellboat notification

Hi [Redacted]

From your previous email it was not clear whether your treatment last one or two twenty four hour periods .
Can you please confirm how long your treatment will last?

Kind Regards
[Redacted]

From: [Redacted] griegseafood.com]
Sent: 02 March 2017 16:42
To: MS Marine Licensing
Subject: further wellboat notifications - Grieg Seafood Shetland / Scalloway Area

Dear Sir / Madam,
Please accept this email as a notification for our further wellboat treatments plan around Scalloway Area / Shetland. From the previous notifications we still got to do Score Holms and Langa. We will be starting treating Score Holms today and weather permitting start Langa on Saturday late evening/ early hours on Sunday – this might actually change due to weather and possibly we might go with the treatments again to North Havra instead of Langa. In this case this notification for 2nd wellboat treatments at North Havra and other sites:
North Havra: 06126/16/0 - start on 05.03.2017, peroxide estimate: 22000 litres, AMX: 1440ml.
Spoose Holm: 06124/16/0 – start on 07.03.2017, peroxide: 25000 litres, AMX: 1620 ml.
West Of Burwick: 06123/16/0 – start on 09.03.2017, peroxide: 50000 litres, AMX: 3060 ml.
Langa: 06128/16/0 – start on10.03.2017, peroxide: 50000 litres, AMX: 3240ml.
Score Holms – 06125/16/0, peroxide 50000 litres, AMX: 3240ml.
Please note as with previous notifications that we might have to change above treatments schedule due to weather conditions.
Best regards, [Redacted]

From: [Redacted] griegseafood.com]
Sent: 23 January 2017 09:43
To: MS FishHealth; MS Marine Licensing
Subject: lice levels WK 3 Grieg Seafood Shetland

Dear Sir / Madam,
Good morning All, I'd like to report lice levels from last week (WK 3) on the sites which are over 3 AF av. All the sites are within Scalloway area/Shetland. Langa – 3.1 AF av, North Papa – 4.73 AF av, West of Burwick – 3.21 AF av. We are still treating using Martin Saele wellboat: so far we've finished treatments at Spoose Holm (20.01.2017) and North Havra (17.01.2017) – sites below 3 AF av after. Treatment started at Score Holms on 21.01.2017 – weather permitting site will be done by the end of this week! Further plan for other sites is: after Score Holms we will treat North Papa using wellboat –when this site is done wellboat will be back harvesting and we'll start tarpaulin treatments at West of Burwick and Langa which should go relatively faster – at the moment we will use peroxide for those 2 sites. If you have any further questions don't hesitate to ask!
Regards, [Redacted]

Data disclosed by SEPA in May 2018 (via F:0188830):

From: Kate McIntyre [mailto:kate.mcintyre@scottishseafarms.com]

Sent: 20 January 2017 09:56

To: MS Marine Licensing

Cc: Environment Scotland; Ewan Gibb; Chris Hempleman

Subject: Notification of wellboat treatment

Dear Marine Scotland,

In preparing the medicines data for our Q4 return it has come to my attention that a wellboat treatment

was carried out at Nevis C in December, and unfortunately this was not notified to Marine Scotland.

Details are as follows:

Site name: Nevis C

Licence Ref: 05422/16/1

Wellboat name: NORHOLM

Agent: Hydrogen peroxide

Treatment date: 13-15/12/2016

Please accept our apologies for this oversight. I will shortly circulate an email around all site managers to

remind them of the notifications procedure, to try and ensure that this does not happen again.

MARINE (SCOTLAND) ACT 2010

MARINE SCOTLAND, MARINE LABORATORY, ABERDEEN

DISCHARGE VESSEL LOG OF OPERATIONS*

Discharge Vessel: Rona Pioneer

Log Sheet Page Number: 1 of 2

Discharge Operation:

Marine Licence Number: 04904/13/0.

Discharge Site: Setternes North

Farm of Operation: FKB/W209

Date	Quantity of Chemical discharged (ml or grams)	Chemical(s) or agent(s) discharged	Discharge operation				Comments
			Time and position: Start	Weather, sea state and tidal set	Time and position: Completion	Rate/ duration* discharge	
24/06/2016	150g	Azamethiphos	60°25.45'N 002°07.69'W	SW F4-5	As for start.	20 mins	STARTED DISCHARGING AT 17:10
25/06/2016	150g	〃	〃	SW F3	〃	〃	〃 AT 11:50
25/06/2016	150g.	〃	〃	S F3-4	〃	〃	〃 AT 17:00
25/06/2016	150g.	〃	〃	SE F3	〃	〃	〃 AT 21:40
26/06/2016	150g.	〃	〃	NE F4	〃	〃	〃 AT: 10:50
26/06/2016	150g.	〃	〃	NE F3-4	〃	〃	〃 AT: 15:50
26/06/2016	150g.	〃	〃	NE F4	〃	〃	〃 AT: 20:25
27/06/2016	150g.	〃	〃	NNE F2	〃	〃	〃 AT: 09:52
27/06/2016	150g.	〃	〃	NNE F3	〃	〃	〃 AT: 14:50
27/06/2016	150g.	〃	〃	NE F3	〃	〃	〃 AT: 19:20
Total	1500g.						

*See Licence Conditions Relating to Discharge Operations

*Delete as appropriate

Farm Manager: JUSTIN WATSON.

Signat

Form Fep6

March 1999

MARINE (SCOTLAND) ACT 2010

MARINE SCOTLAND, MARINE LABORATORY, ABERDEEN

DISCHARGE VESSEL LOG OF OPERATIONS*

Discharge Vessel: Rona Pioneer

Log Sheet Page Number: 2 of 2.

Discharge Operation:

Marine Licence Number: 04904/13/0

Discharge Site: Setternes North

Farm of Operation: FKB/W209.

Date	Quantity of Chemical discharged (ml or grams)	Chemical(s) or agent(s) discharged	Discharge operation				Comments
			Time and position: Start	Weather, sea state and tidal set	Time and position: Completion	Rate/ duration* discharge	
25/06/2016	150g.	Azamethiphos	60°25.45'N 002°07.69'W	SW F5	As for start	20 mins	STARTED DISCHARGING AT: 11:10
26/06/2016	150g.	〃	〃	SW F5-6	〃	〃	〃 AT: 17:05
Total	300g.						

*See Licence Conditions Relating to Discharge Operations

*Delete as appropriate

Farm Manager: JUSTIN WATSON

Signatur

Form Fep6

1999

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

Email ms.marinelicensing@scotland.gsi.gov.uk

From: Alasdair MacLennan

alasdair.maclennan@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX
Telephone 01397 701550
Moblie
Fax 01397 701174

Date: 9th May 2016

We intend to discharge the following used product from the wellboat **Ronja Challenger** in compliance with licence conditions:
Actual times of discharge are subject to weather and workload.

Site	Product	Active Ingredient	Quantity (litres or grams)	Date	
				Start	End
Stulaigh - License No. 05968/16/0	salmosan	azamethiphos	1200g (600g active)	09/05/2016	11/05/2016

Signed:

Alasdair MacLennan
Area Health Manager (Skye & Uists)

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: dave.cockerill@marineharvest.com

To: Marine Scotland

From: Dave Cockerill

Email: MS.MarineLicensing@gov.scot

Date: 17th October 2016

We intend to discharge the following in compliance with consent conditions:

Site	MS	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (kg)	Start	End
West Loch Tarbert (Soay)	FS0646	Salmosan Vet (FVG)	Azamethiphos	2,000g	1,335,288	19th October 2016	2nd November 2016

Signed

Dave Cockerill
Veterinarian, Head of Fish Health

Fax message

To'MS.Marie
Licensing@
gov.scot'

Fax Number

C.c.

From Alasdair Duce. Date 19/2/16

	Quantity (up to) grams	Dates	
	FVG	start	End
Site	(Salmosan)	22/2/16	26/2/16
West Loch Tarbert	Active		
Soay.	1kg		
CAR/L/1004053			

All stocked pens.

Alasdair Duce
Regional Health Manager

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

Email env_prot@marlab.ac.uk

Date: 30th November 2016

From: Ray Waddell

ray.waddell@marineharvest.com

Marine Harvest (Scotland) Ltd.
Farms Office, Blar Mhor Industrial Estate
Fort William, PH33 7TP
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following used chemical from the wellboat Inter Caledonia in compliance with licence conditions. Actual times of discharge are subject to weather and workload.

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Date	
				Start	End
Loch Hourn 06008/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	1100.00	1000hrs 01/12/2016	06/12/2016

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: dave.cockerill@marineharvest.com

To: Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

From: Dave Cockerill

Email: EPIwesthighands-argyll@sepa.org.uk

Date: 17th August 2016

We intend to discharge the following used sea lice treatment product from the wellboat **Caledonia** in compliance with licence conditions:
Actual times of discharge are subject to weather and workload.

Site	Therapeutant	Active Ingredient	Quantit Grams	Start	End
Greshornish Licence no: 04807/13/0 Ref: FKB/W40	Salmosan Vet	Azamethiphos	2400g active (4800g product)	18th August 2016	21st August 2016

From: Justin Watson [mailto:justin.watson@griegseafood.com]

Sent: 22 August 2016 16:24

To: MS Marine Licensing

Cc: Jakub Pierzynowski; Bill Johnson

Subject: RE: notification of treatments at Gob na Hoe & Leneish

Hi Hannah,

We intend to use Salmosan – active ingredient is Azamethiphos. We are aiming to use ~200g per wellboat load taking approximately 3.5-4 hrs per load and aiming for 3-4 loads per day. That would equate to 600-800g of Salmosan per 24hrs, within our consented limits.

If I've understood you correctly the correspondence with my colleague Kaye does not effect our current

Marine Licence to deposit chemicals.

Regards

Justin

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]

Sent: 22 August 2016 16:09

To: Justin Watson <justin.watson@griegseafood.com>

Subject: RE: notification of treatments at Gob na Hoe & Leneish

Dear Justin,

Thank you for the notification. Please can you provide me with details of the product name and quantity of chemicals or agents intended for discharge. Please note that you do not have AMX on your current licence.

Please also note that Gob na Hoe does not currently have a valid marine farm licence as the application is currently on hold (see attached email), therefore we will not be able to grant a licence for your new application for wellboat discharge, until this has been licensed.

From: Kate McIntyre [mailto:kate.mcintyre@scottishseafarms.com]

Sent: 08 April 2016 09:05

To: MS Marine Licensing

Cc: Geoff Kidd; Environment Scotland

Subject: Notification of wellboat treatment

Dear Marine Scotland,

We are intending to carry out a wellboat treatment as follows:

Site name: Spelve B

Licence Ref: 05425/15/0

Wellboat name: NORHOLM

Agent: Azasure/hydrogen peroxide

Treatment date: Commencing 11/04/2016

Fax message

ToMS.MarineLicensing@gov.scot

Fax Number

C.c.

From Alasdair Duce. Date 12/4/16

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	Quantity (up to) grams		Dates	
	AMX	FVG	Start	End
Site	Active	(Salmosan)	15/4/16	18/4/16
Loch Erisort,		Active.		
North Shore West CAR/L/1004085		1kg.		
North Shore East CAR/L/1129789		1kg.		
Tabhaigh CAR/L/1129793		1kg.		

All stocked pens.

Alasdair Duce
Regional Health Manager

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: dave.cockerill@marineharvest.com

To: Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

From: Dave Cockerill

Email: ms.marinelicencing@gov.uk

Date: 17th August 2016

We intend to discharge the following used sea lice treatment product from the wellboat **Inter Caledonia** in compliance with licence conditions:
Actual times of discharge are subject to weather and workload.

Site	Therapeutant	Active Ingredient	Quantity Grams	Start	End
Colonsay Licence no: 05998/16/0 Ref: 05998	Salmosan Vet	Azamethiphos	2400g active (4800g product)	22nd August 2016	26th August 2016

Signed

Dave Cockerill
Veterinarian, Head of Fish Health

From: Duce, Alasdair [mailto:Alasdair.Duce@marineharvest.com]

Sent: 26 June 2016 19:07

To: MS Marine Licensing

Cc: Manager, West Loch Tarbert; MacLeod, Don; Cockerill, David; MacGruer, Lynsey; Read, Chris

Subject: RE: Marine Scotland - Licensing Operations Team

Hi just an update to this Due to some unforeseen delays we will now be starting this treatment at West

loch Tarbert (soay) on Tuesday 28th June and finish on Sunday 2nd of july.

We now plan to use slightly more Salmosan 4.2kg or 2.1kg active ingredient.

Any problems please give me a call,

From: Kerry.Bell@gov.scot

Sent: 05 September 2016 16:51

To: FF Application

Subject:Notification of intended wellboat discharge

Dear Sir/Madam

I write to advise that Grieg Seafood Shetland Limited have notified us that they carried out wellboat discharge operations at their marine farm sites at South of Linga and Setterness South, Shetland 04 September 2016.

The chemical used was hydrogen peroxide.

To	SEPA Lochgilphead		
C.c.	SEPA Registry Dingwall		
From	Iain Webster	Date	11.11.16

We intend to discharge the following in compliance with consent conditions.

	Quantity (up to) grams				Dates	
Site	**Deltamethrin** (AlphaMax or AMX, Pharmaq)	**Azamethiphos** (Salmosan, Novartis)	**Emamectin** (SLICE, Schering-Plough)	**Teflubenzuron** (Calicide, Trouw)	**Start**	**End**
Kingairloch CAR/L/1003887		1000			11.11.16	17.11.16

Signed:

Iain Webster

To SEPA Lochgilphead

C.c. SEPA Dingwall Registry

From Iain Webster Date 06.10.16 Page 1 of 1

We intend to discharge the following in compliance with consent conditions.

Site	Quantity (up to) grams				Dates	
	Deltamethrin (AlphaMax or AMX, Pharmaq)	Azamethiphos (Salmosan, Novartis)	Emamectin (SLICE, Schering-Plough)	Teflubenzuron (Calicide, Trouw)	Start	End
Carradale South (AKA Eilean Grianain) CAR/L/10 78064		1200g			09.10.16	23.10.16
Carradale North CAR/L/1 131788131 788		3400g			09.09.16	23.09.16

Signed:

Iain Webster

Data disclosed by the Scottish Government in April 2018 (via FoI/18/00985):

2017	The Scottish Salmon Company			Returns as of 27/03/2018 detailed below - Awaiting final returns for 2017.		
Site	MCMS No.	Date	Time	Duration	Product	Amount
Gob a Bharra	05211	08/06/2017	09:00	60 mins	Hydrogen Peroxide	8000L

2017	Scottish Sea Farms		Returns as of 27/03/2018 detailed below - Awaiting final returns for 2017.			
Site	MCMS No.	Date	Time	Duration	Product	Amount
Holms Geo	05246	27/04/2017	22:00	60 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	28/04/2017	10:10	70 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	28/04/2017	14:23	45 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	28/04/2017	19:10	40 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	29/04/2017	10:08	34 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	29/04/2017	15:00	40 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	29/04/2017	18:55	40 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	29/04/2017	22:50	40 mins	Hydrogen Peroxide	3800L
Holms Geo	05246	30/04/2017	02:20	40 mins	Hydrogen Peroxide	3800L
Teitsi Geo	05240	30/04/2017	12:30	40 mins	Salmosan	280g
Teitsi Geo	05240	30/04/2017	12:30	40 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	30/04/2017	16:25	45 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	30/04/2017	20:25	45 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	01/05/2017	01:10	62 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	01/05/2017	13:00	48 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	01/05/2017	17:25	45 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	01/05/2017	21:35	40 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	02/05/2017	01:20	40 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	02/05/2017	12:40	45 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	02/05/2017	16:40	55 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	02/05/2017	20:30	35 mins	Hydrogen Peroxide	4300L
Teitsi Geo	05240	03/05/2017	01:00	50 mins	Hydrogen Peroxide	4300L

2017	Kames		Awaiting final returns for 2017 (as of 27/03/2018).			
Site	MCMS No.	Date	Time	Duration	Product	Amount

2017	Grieg Seafood Ltd		Awaiting final returns for 2017 (as of 27/03/2018).			
Site	MCMS No.	Date	Time	Duration	Product	Amount

2017	Cooke Aquaculture		Confirmed nil returns			
Site	MCMS No.	Date	Time	Duration	Product	Amount

2017	Marine Harvest		Awaiting final returns for 2017 (as of 27/03/2018).			
Site	MCMS No.	Date	Time	Duration	Product	Amount

MARINE (SCOTLAND) ACT 2010

MARINE SCOTLAND, MARINE LABORATORY, ABERDEEN

DISCHARGE VESSEL LOG OF OPERATIONS*

Discharge Vessel: Oylaks

Log Sheet Page Number: 1

Discharge Operation: Lice treatment

Marine Licence Number: 05246/17/0

Discharge Site: Holms Geo

Farm of Operation: Holms Geo

Date	Quantity of Chemical discharged (ml or grams)	Chemical(s) or agent(s) discharged	Discharge operation				Comments
			Time and position: Start	Weather, sea state and tidal set	Time and position: Completion	Rate/ duration* discharge	
27/4/17	280/3800	H2O2	22:00 Cage 12	Calm	2300	1hr	
28/4/17	3800	H2O2	1010 cage 1	Calm	1120	1hr 10min	
28/4/17	3800	H2O2	1423 Cage 2	Calm	1508	45min	
28/4/17	3800	H2O2	1910 Cage 3	Calm	2000	40min	
29/4/17	3800	H2O2	1008 cage 4	South Easterly force 3-4	1042	34min	
29/4/17	3800	H2O2	1500 cage 5	South East force 5	1540	40min	
29/4/17	3800	H2O2	1855 cage 6	South East force 5	1935	40min	
29/4/17	3800	H2O2	2250 cage 7	South East force 5	1130	40min	
30/4/17	3800	H2O2	0220 cage 9	South East force 5	0300	40min	
Total	280/34200						

*Delete as appropriate

Farm Manager: [Redacted]

Signature: [Redacted]

Form Fap6

March 1999

MARINE (SCOTLAND) ACT 2010

MARINE SCOTLAND, MARINE LABORATORY, ABERDEEN

DISCHARGE VESSEL LOG OF OPERATIONS*

Discharge Vessel: Oylaks

Log Sheet Page Number: 1

Discharge Operation: Lice treatment

Marine Licence Number: 05240/17/0

Discharge Site: Teisti Geo

Farm of Operation: Teisti Geo

Date	Quantity of Chemical discharged (ml or grams)	Chemical(s) or agent(s) discharged	Discharge operation				Comments
			Time and position: Start	Weather, sea state and tidal set	Time and position: Completion	Rate/ duration* discharge	
30/4/17	280/4300	Salmosan /Hydrogen Peroxide	1230 C8	SE Force 5	1310	40min	
30/4/17	4300	Hydrogen Peroxide	1625 C13	SE Force 5	1710	45min	
30/4/17	4300	Hydrogen Peroxide	2025 C9	SE Force 5	2110	45min	
1/5/17	4300	Hydrogen Peroxide	0008 C11	SE Force 4	0110	62min	
1/5/17	4300	Hydrogen Peroxide	1212 C14	SE Force 5	1300	48min	
1/5/17	4300	Hydrogen Peroxide	1640 C1	SE Force 5	1725	45min	
1/5/17	4300	Hydrogen Peroxide	2050 C2	SE Force 4	2135	40min	
2/5/17	4300	Hydrogen Peroxide	0120 C3	SE Force 4	0200	40min	
2/5/17	4300	Hydrogen Peroxide	1240 C4	Calm	1325	45min	
2/5/17	4300	Hydrogen Peroxide	1640 C5	Calm	1735	55min	
2/5/17	4300	Hydrogen Peroxide	2030 C6	Calm	2105	35min	
3/5/17	4300	Hydrogen Peroxide	0010 C7	Calm	0100	50min	
Total	280/51600						

*See Licence Conditions Relating to Discharge Operations

*Delete as appropriate

Farm Manager: [Redacted]

Signature: [Redacted]

MARINE (SCOTLAND) ACT 2010

MARINE SCOTLAND, MARINE LABORATORY, ABERDEEN

DISCHARGE VESSEL LOG OF OPERATIONS*

Discharge Vessel: Ronja Supporter

Log Sheet Page Number: 1

Discharge Operation: Sea lice trearment

Marine Licence Number: FS/0683

Discharge Site: Gob a Bharra

Farm of Operation: Gob a Bharra/Loch Fyne

Date	Quantity of Chemical discharged (ml or grams)	Chemical(s) or agent(s) discharged	Discharge operation				Comments
			Time and position: Start	Weather, sea state and tidal set	Time and position: Completion	Rate/ duration* discharge	
08/06/17	8000 litres	H2O2	09:00 55'56.0593 05'21.4239	Calm, dull. Flood tide	13:10 55'56.0667 05'21.4898	1500 ppm/20 minutes per cage	
Total	8000						

*See Licence Conditions Relating to Discharge Operations

Data disclosed by SEPA in April 2018 (via F:0188668):

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

From: Ray Waddell

ray.waddell@marineharvest.com

Email ms.marinelicensing@gov.scot

Marine Harvest (Scotland) Ltd.
Farms Office, Blar Mhor Industrial Estate
Fort William, PH33 7TP
Telephone 01397 701 550
Mobile
Fax 01397 701 174

Date: 3rd February 2017

We intend to discharge the following used chemical from the wellboat Inter Caledonia in compliance with licence conditions. Actual times of discharge are subject to weather and workload.

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Date	
				Start	End
Cairidh 05996/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	220g	0900hrs 04/02/2017	07/02/2017
Maol Ban 06021/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	2530g	0900hrs 04/01/2017	26/02/2017
Sconser 06018/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	1210g	1400hrs 04/02/2017	26/02/2017

To Marine Scotland

Email msmarinelicensing@gov.scot

Date: 19th June 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
North Shore West CAR/L/1004085; North Shore East CAR/L/1129789; Tabhigh CAR/L/1129793/VN01	Salmosan Vet	Azamethiphos	220g;220g; 240g repectively	2500T	21/06/2017	

To Marine Scotland

Email MS.MarineLicensing@gov.scot'

Date: 22nd August 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
Noster CAR/L/1009974/VN10 & MPSv5; Seaforth CAR/L/1009963/VN12 & MPSv4; Trillichean Mor CAR/L/1003016	Salmosan	Aamethipho s	170g; 190g and 190g respectively	200T	24/08/2017	~26/08/17

Treatment boat - Inter Caladonia well boat

To
Marine Scotland

Email msmarinelicensing@gov.scot

Date: 26th August 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
Caolas a Deas East, Loch Shell CAR/l/1120220;	Salmosan Vet	Azamethiphos	400g per 24 hours	~700T	26.08.17	~29.08.17

To
Marine Scotland

Email msmarinelicensing@gov.scot

Date: 19th June 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
North Shore West CAR/L/1004085; North Shore East CAR/L/1129789; Tabhigh CAR/L/1129793/VN01	Salmosan Vet	Azamethiphos	220g;220g; 240g repectively	2500T	21/06/2017	

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: WestHighlandArgyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 19th April 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) g of active ingredient	Biomass (T)	Start	End
Maclean's Nose	CAR/L/1002965	Salmosan 880g	Azamethiphos	440g	30T	21st April 2017	22nd April 2017

Signed

Sabina Wilinska
Health Manager

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: EPIwesthighands-argyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 06th January 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (T)	Start	End
Shuna	CAR/L/1109 280	Salmosan	Azamethiphos	2240g	229T	9th January	20th January

Signed

Sabina Wilinska
Health manager

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: EPIwesthighands-argyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 06th January 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (T)	Start	End
BDNC	CAR/L/1004 226	Salmosan	Azamethiphos	2660g	547T	9th January	20th January

Signed

Sabina Wilinska
Health manager

To Marine Scotland

Email MS.MarineLicensing@gov.scot'

Date: 22nd August 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
Noster CAR/L/1009974/VN10 & MPSv5; Seaforth CAR/L/1009963/VN12 & MPSv4; Trillichean Mor CAR/L/1003016	Salmosan	Aamethipho s	170g; 190g and 190g respectively	200T	24/08/2017	~26/08/17

Treatment boat - Inter Caladonia well boat

Fax message

marineharvest
excellence in seafood

To Marine Scotland

Fax Number

C.c.

From Alasdair Duce Date 03/3/17

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	Quantity (up to) grams	Dates	
	Azamethiphos	Start	End
Site	(Salmosan)	3/3/17	14/3/17
North shore West CAR/L/1004085	1,000kg Active.		
North shore East CAR/L/1129789 All stocked pens.	2.000kg Active.		

Alasdair Duce
Regional Health Manager

Dave Cockerill MRCVS (MHS Veterinarian

From: Jakub Pierzynowski [mailto:jakub.pierzynowski@griegseafood.com]

Sent: 10 May 2017 15:19

To: MS Marine Licensing

Cc: Justin Watson

Subject: wellboat notifications Grieg Seafood Shetland

Dear Sir / Madam,

Please accept this email as notification for our wellboat treatments plan. At this stage (apologise) but it's

not possible to give you 100% answer where we will start. It depends as always on the weather and our

other treatments in progress at the moment.

Wellboat: Oysund.

Locations: West Of Burwick (06123/16/0) – start: 14.05.2017, finish: 16.05.2017.

Spoose Holm (06124/16/0) – start: 14.05.2017, finish: 15.05.2017.

Score Holms (06125/16/0) – start: 15.05.2017, finish: 19.05.2017.

Langa (06128/16/0) – start: 18.05.2017, finish: 21.05.2017.

To be discharged: West Of Burwick: Peroxide – 43000 litres, Salmosan Vet – 3060 grams.

Spoose Holm: Peroxide – 18000 litres, Salmosan Vet – 1260 grams.

Score Holms: Peroxide – 53000 litres, Salmosan Vet – 3580 grams.

Langa: Peroxide – 55000 litres, Salmosan Vet – 3960 grams.

If you have any questions just let me know and I'll try to help!

From: Jakub Pierzynowski [mailto:jakub.pierzynowski@griegseafood.com]

Sent: 22 February 2017 15:20

To: MS Marine Licensing

Subject: Wellboat treatment notifications Grieg Seafood Shetland

Dear Sir / Madam,

Please accept this email as notification for wellboat treatments in Shetland within Scalloway area.

Wellboat to be used is Oysund. Starting on Sunday 26.02.2017 at North Havra (licence 06126/16/0)–

estimated usage of peroxide: 26000 ltrs and AMX: 1440 ml. Next site to be treated straight after

(27.02.2017) is Spoose Holm (licence 06124/16/0) – estimated usage of peroxide: 29500 ltrs and AMX:

1620 ml. Next location will be West Of Burwick from 28.02.2017 (licence 06123/16/0) – estimated usage

of peroxide: 55000 ltrs and AMX: 3060 ml.

Please note that locations might be treated with other order due to weather conditions etc. Our

intention is to treat entire Scalloway area site after site. Other sites North Papa, Langa, Score Holms will

be treated as well – notifications for those would be send within next couple of days.

Regards, Jakub Pierzynowski, MRCVS.

From: Jakub Pierzynowski [mailto:jakub.pierzynowski@griegseafood.com]

Sent: 02 March 2017 16:42

To: MS Marine Licensing

Subject: further wellboat notifications - Grieg Seafood Shetland / Scalloway Area

Dear Sir / Madam,

Please accept this email as a notification for our further wellboat treatments plan around Scalloway Area

/ Shetland. From the previous notifications we still got to do Score Holms and Langa. We will be starting

treating Score Holms today and weather permitting start Langa on Saturday late evening/ early hours on

Sunday – this might actually change due to weather and possibly we might go with the treatments again

to North Havra instead of Langa. In this case this notification for 2nd wellboat treatments at North Havra

and other sites:

North Havra: 06126/16/0 - start on 05.03.2017, peroxide estimate: 22000 litres, AMX: 1440ml.

Spoose Holm: 06124/16/0 – start on 07.03.2017, peroxide: 25000 litres, AMX: 1620 ml.

West Of Burwick: 06123/16/0 – start on 09.03.2017, peroxide: 50000 litres, AMX: 3060 ml.

Langa: 06128/16/0 – start on10.03.2017, peroxide: 50000 litres, AMX: 3240ml.

Score Holms – 06125/16/0, peroxide 50000 litres, AMX: 3240ml.

Please note as with previous notifications that we might have to change above treatments schedule due

to weather conditions.

Best regards, Jakub Pierzynowski, MRCVS.

From: Geoff Kidd [mailto:geoff.kidd@scottishseafarms.com]

Sent: 02 November 2017 09:33

To: MS Marine Licensing

Cc: Environment All; Chris Hempleman

Subject: Spelve B wellboat treatment notification

Dear Marine Scotland,

We hereby notify you of our intention to treat the following site:

Site name: Spelve B

Licence Ref: 05425

Wellboat name: Ronja Skye

Agent: Azasure

Quantity: Approx. 200g (100g active)

Treatment date: Commencing 04/11/2017

From: Jakub Pierzynowski [mailto:jakub.pierzynowski@griegseafood.com]

Sent: 29 May 2017 15:58

To: MS Marine Licensing

Subject: wellboat notification North Voe Whalsay

Dear Sir / Madam,

Please accept this email as notification for wellboat treatment at North Voe Whalsay – 06029/16/0.

Wellboat – Martin Saele. Start: 01.06.2017. Finish: 03.06.2017. To be discharged: Salmosan Vet: 1600 g.

Best Regards, Jakub Pierzynowski, MRCVS.

From: Duce, Alasdair [mailto:Alasdair.Duce@marineharvest.com]

Sent: 14 August 2017 12:11

To: MS Marine Licensing

Cc: MacGruer, Lynsey; Read, Chris; Manager, Erisort; MacLeod, Don

Subject: RE: Marine Scotland - Licensing Operations Team

Hi,

I would like to notify you of our plan to treat fish at our farm at marine harvest, loch Erisort Tabhaigh (

FS1297).

We are planning to do some well boat treatments at tabhaigh using Salmosan.

Treatments will start on Thursday 17th August finishing on Sunday 20th . And we intend to use 1.8kg salmosan or 900g of active substance.

> From: MacGruer, Lynsey [mailto:lynsey.macgruer@marineharvest.com]
>
> Sent: 11 September 2017 16:26
>
> To: MS Marine Licensing
>
> Subject: RE: Notification of discharge of medicines at PNG CAR/L/1000800 (MHS)
>
> Apologies for the very late request, but we are carrying out an Alphamax treatment starting today at South West Shuna for the next 5 days.
>
> Kames will be sending the formal notification shortly but here is the information.
>
> Starting on Monday 11th September for 5 days.
>
> Alphamax is the Therapeutant at 15grams per day with 75g total being used.
>
> The biomass on site is 1725T

The quantity of Alphamax is 7.5 litres which is 30 bottles total over the treatment.

Again apologies for the last minute notification.

Many thanks in advance.

Best regards

Lynsey MacGruer

Production Assistant

MARINE HARVEST SCOTLAND LTD

MOBILE:

DIRECT: +44 139 771 5032

MAIL: lynsey.macgruer@marineharvest.com

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]

Sent: 11 September 2017 14:41

To: MacGruer, Lynsey

Cc: Wilinska, Sabina

Subject: RE: Notification of discharge of medicines at PNG CAR/L/1000800 (MHS)

Hi Lyndsey,

Thank you. Please note that the licence you sent through is for Shuna South West and is for Kames fish farming and not Marine Harvest. Additionally, I note that Sabina referred to a CAR licence at PNG. If a treatment is carried out the discharge of the chemicals must be at the site where the treatment was completes and not at another site.

Can you please confirm whether the you are treating and discharging at PNG or Shuna South West?

From: Kate McIntyre [mailto:kate.mcintyre@scottishseafarms.com]

Sent: 22 June 2017 16:15

To: Cameron J (Jacqueline)

Cc: Environment All; Alastair Fraser; Chris Hempleman; MS Marine Licensing

Subject: RE: Wellboat treatment notification

Hi Jacqui,

The proposed quantities to be used are as follows:

Fishnish A – 1100g Azasure so 550 g Azamethiphos over 4 days with 10,164 ltrs Paramove 50 over same

period.

Fishnish B – 900g Azasure so 450g Azamethiphios over 3 days with 8316 ltrs Paramove 50 over the same

period.

From: Jakub Pierzynowski [mailto:jakub.pierzynowski@griegseafood.com]

Sent: 03 May 2017 18:53

To: MS Marine Licensing; Justin Watson

Cc: Base Dunvegan

Subject: wellboat notification

Dear Sir / Madam,

Please accept this email as notification for upcoming wellboat treatments in Duvegan Area / Grieg Seafood Shetland Ltd. Wellboat – Oysund. Sites and chemicals to be discharged: Gob Na Hoe (06032/16/0) – Peroxide: 35000 litres, Salmosan Vet: 2520 g. Leinish (06031/16/0) – Peroxide: 23000 litres, Salmosan Vet: 1620 g. Estimated start date: 06.05.2017. Estimated finish date: 15.05.2017.

Best regards, Jakub Pierzynowski, MRCVS.

Information disclosed by the Scottish Government in April 2018 (via FoI/18/00985):

From:[Redacted]
Sent: 13 December 2017 08:59
To:[Redacted] @bmkanimalhealth.com
Subject: Ectosan / CleanTreat

Hi [Redacted]

I work in the fish and shellfish health policy division of Scottish Government. I have inherited your business card from a colleague who left our unit at the start of this year[Redacted] .

I noted the recent article on Ectosan in fish farming expert with interest. I am aware that trials are ongoing, however I was hoping you might be able to give me some further information?
Are you able to give an update on the status of trials in Norway? (for example, are you currently going through the authorisation process?)

I would also be interested to know if the CleanTreat system is already in use in Norwegian aquaculture.

Grateful for any info you can provide

Best regards
[Redacted]

Marine Scotland – Performance, Aquaculture and Recreational Fisheries
Tel: [Redacted]
E-mail[Redacted] @gov.scot
Web: http://www.scotland.gov.uk/marinescotland
Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ

From:[Redacted] @gov.scot]
Sent: 13 December 2017 11:13
To:[Redacted] @scottishaquaculture.com>
Cc:[Redacte @gov.scot
Subject: Ectosan sea lice treatment

Morning [Redacted]

I am sure you are already aware of the article https://www.fishfarmingexpert.com/news/new-lice-bath-100-effective-and-pollution-free/ but I wondered if you had any further readout around this particular innovation which on face value could be a significant game-changer. As I recall, Benchmark are an industry member of SAIC.

Regards

[Redacted]

[Redacted]

Marine Scotland
Scottish Government | Area 1-B North | Victoria Quay | EH6 6QQ

T:[Redacted]
[Redacted]

From:[Redacted] @scottishaquaculture.com]
Sent: 13 December 2017 14:01
To:[Redacted]
Cc:[Redacted]
Subject: RE: Ectosan sea lice treatment

Hi[Redacted]

Thanks for the Ectosan press release.

I note that Benchmark describe Ectosan as a follow on product to Salmosan. There's no publicly available on active ingredients, but I wonder if it's also azamethiphos-based, with the associated regulatory controls and need to avoid sea lice resistance, etc?

Regarding CleanTreat, this water purification system was presented at a SSPO meeting last week – again, no details provided on how the tech works, which made some of the audience a bit sceptical. Interestingly, it was mentioned that the shipping container-based modules would need to be multiplied up to enable treatment of commercial scale water volumes. As I understood things, this would in turn need a secondary vessel alongside the well boat. Finally, it was mentioned that initial discussion have been had with SEPA, but no indication as to how advanced these are.

I hope this is of some help!

Best regards,

[Redacted]

[Redacted]
[Redacted]
Scottish Aquaculture Innovation Centre
(t)[Redacted] **(m)**[Redacted] **(w)** scottishaquaculture.com Connect+Collaborate

Delivering industry success through research partnerships

Scottish Aquaculture Innovation Centre

Innovation Centres

From:[Redacted] (MARLAB)
Sent: 14 December 2017 10:17
To:[Redacted]
Subject: RE: Ectosan sea lice treatment

On the original topic – Benchmark presented on the Cleantreat system – in principle (if as effective as is presented) it is a good, if expensive, solution to discharge consent for bath treatments. If it is used as suggested it could remove the rate limiting factor of discharge consent for bath treatments – however, I'm not sure that there is sufficient wellboat capacity to use it as suggested.

Happy to discuss further.

[Redacted]
[Redacted]
Marine Scotland|Marine Laboratory|375 Victoria Road|Aberdeen|AB11 9DB

Tel:[Redacted]
Mobile:[Redacted]

www.gov.scot/marinescotland

Information disclosed by Scottish Natural Heritage in April 2018 (via SIR149947/ A2598894):

marinescotland

T:+44 (0)1224 295579 F: +44 (0)1224 295524
E: MS.MarineLicensing@scotland.gsi.gov.uk

The Scottish Government

Discharge of Treatment Agents in the Territorial Sea and UK Controlled Waters Adjacent to Scotland

Marine (Scotland Act) 2010

IMPORTANT: Before you start to complete this form, please read these notes carefully.

The following numbered paragraphs correspond to the questions on the application form and are intended to assist applicants in completing the form. These explanatory notes are specific to this application and so applicants are advised to read these in conjunction with the General Guidance document. If further clarification is needed please contact MS-LOT on 01224 295579 or email:

MS.MarineLicensing@scotland.gsi.gov.uk

Please refer to the General Guidance document for information regarding payment methods.

Explanatory Notes

2. Applicant

The person, company or organisation making the application that will be named as the licensee on any licence issued.

3. Proposed licensee details

Please provide the details of the person, company or organisation to appear as the licencee.

4. Agent

Any person, company or organisation involved in the works. For example, they may be engaged to act under contract or other agreement on behalf of any party listed in the answer to question 2 and having responsibility for the control, management or deposit anywhere below the tidal limit of the mean high water springs (MHWS).

5. Best Practicable Environmental Option (BPEO) Assessment

Under section 27(2) of the Marine (Scotland) Act 2010 (there is no equivalent provision under the Marine and Coastal Access Act 2009), the licensing authority has an obligation to consider the availability of practical alternatives when considering applications involving disposal of material at sea. All applications must be supported by a detailed assessment of the alternative options - a best practicable environmental option (BPEO) assessment. This should include a statement setting out the reasons why deposit of the materials at sea is the preferred option and applications will not be considered unless they are accompanied by such an assessment. All options in the BPEO should be explored fully (as per the guidance documents) otherwise your form and BPEO are liable to be returned to you, thereby delaying processing of the application.

6. Details of Current Licence (if any)

Enter the appropriate details for the current licence. If you have previously held a licence in respect of this operation, but no current licence exists, please provide the details for the most recently expired licence. If you have no knowledge of any previous licence, please enter "not applicable" (or "n/a").

7. Licence Start Date

Please provide details of when you wish the licence period to start. Licences will normally be issued for a 12 month period, with a possibility of extension.

8. Discharge Location(s)

You must provide information regarding the discharge site covered by the application. Please provide:

- an admiralty chart extract/map with the discharge site clearly marked;
- licensing zone - this refers to the delineation of areas for the purposes of charging, these can be found at http://www.scotland.gov.uk/Topics/marine/Fish-Shellfish/FHI/managementagreement and
- the co-ordinates for the site where discharge will take place - Include a list of the National Grid References (NGR) or latitude and longitude co-ordinates of the boundary points for the proposed dredge areas.

NGR - Should consist of two letters followed by 10 digits (e.g. TL6320031700) where the first 5 digits are the eastings (read from the south west corner of an Ordnance Survey map) and the last 5 digits are northings.

Latitude & longitude - For positions read from charts of 1:25,000 scale or smaller, the format should be, e.g.

55°55'.55N 2°22'.22W. The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the datum should be explicitly marked, e.g. 55°55'44"N 2°22'11"W. For positions read from larger scale charts, e.g. 1:10,000, three decimal places of minutes should be used, e.g. 55°55'.444N 2°22'.222W.

- the distance from land in meters
- information relating the tidal steams and residual currents, if known (this data should be provided in a separate submission and/or report).

9. Rationale for Proposed Discharge

Please state why you wish to undertake the activity, for example, discharge of water and chemical product following treatment of farmed fish for sealice.

10. Details of Material to be Discharged

Provide the proprietary name(s) of all chemicals/agents (e.g. Excis), the chemical name(s) or other relevant description(s) of all chemicals (e.g. cypermethrin) and provide all appropriate Material Safety Data Sheets.

11. Post Treatment Chemical(s) or Agent(s) to be Discharged

Provide details of any treatment of the agents used prior to discharge.

12. Details of Scale of Discharge

This section requires the following data to be provided for the material(s) to be deposited/discharged:

- date: wherever possible approximate date of discharge should be provided.
- duration: the estimated duration that the chemicals being discharged are likely to be detectable/active in the water column
- weight/volume of agent: this refers to the discharge dose of each chemical, including post treatment if required.
- total volume: the total volume to be discharged from each vessel and also the number of wells in each vessel to be used during the procedure.

13. Details of Deposit/Discharge Procedure(s)

Provide details of:

- the origin of deposit (e.g. marine structure, vessel),
- the method of deposit (e.g. gravity, discharge pump),
- the mode of deposit (e.g. through a pipeline, valve, diffuser, bucket),
- the depth of deposit (e.g. sea surface, subsurface with depth),
- the rate of deposit (e.g. discharge rate – litres or m^3 per second, minute or hour). For wellboat applications, this should be given for each well).

14. Details of Vessel Undertaking Discharge

Provide the name and call sign, if appropriate, of each of the structures and/or vessels involved in the procedure. It is understood that vessel availability issues often lead to changes over small time scales to vessel choice. Please be as exhaustive as possible in the list of vessels that may be used to reduce the need for further administrative changes.

15. Details of Vessel Operator Undertaking Discharge

The name, address and any other available contact details should be provided for the operators and/or owners of the structures and/or vessels involved in the procedure.

16. Monitoring of Discharge

Provide details of proposed or established monitoring and if you believe monitoring is required. A condition requiring monitoring of the effects of the activity may be included in the licence.

17. Consultation with Conservation Bodies

Consenting Authorities have a duty to ensure marine projects will not have a significant adverse environmental impact, particularly upon designated conservation areas (e.g. SSSI, SAC, SPA, Ramsar sites etc). All details of consultations with conservation bodies (e.g. SNH) should be given, particularly where the applicant has statutory powers for consenting aspects of the project. Indicate whether the proposed project is located within or close to the boundaries of a conservation area such as a SAC, SPA, SSSI or Ramsar site (further information can be found on the SNH SiteLink webpage http://gateway.snh.gov.uk).

Any application for beach replenishment works should be cross checked as to whether the proposed site is a designated bathing water site and if so, ideally all physical works should be done outwith the Bathing Water Season (1st June to 15th September). Further guidance on the Bathing Waters Directive (2006/7/EC) can be obtained from www.sepa.org.uk/data/bathingwaters.

In addition, guidance can be obtained from www.foodstandards.gov.uk/ with regards to the Shellfish Waters Directive (2006/113/EC) which has parameters set to protect the water quality in which edible shellfish are grown.

18. Other Considerations

Applicants should also be aware of the need to pay due regard to coastal and marine archaeological matters and attention is drawn to Historic Scotland's Operational Policy Paper HP6, "Conserving the Underwater Heritage".

Please ensure that you have:

- completed all applicable sections of the application form;
- signed and dated the declaration;
- provided the correct relevant documents, charts, and continuation sheets (where necessary); and
- enclosed the correct payment (together with the remittance slip) or paid by means of BACS (if appropriate).

Otherwise your application may be delayed or returned to you.

Application for Discharge of Treatment Agents in the Territorial Sea and UK Controlled Waters Adjacent to Scotland

(ML-004)

Marine (Scotland) Act 2010

It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Part 4, Section 54 of the Marine (Scotland) Act 2010 and Section 101 of the Marine and Coastal Access Act 2009 all information contained within or provided in support of this application will be placed on the Public Register. There is no national security grounds for application information not going on the Register under the 2010 Act. Under the 2009 Act, application information goes on the Register unless the Secretary of State determines that it's disclosure in the Register would be contrary to the interests of national security.

Public Register

Is there any information contained within or provided in support of this application that you consider should not be included on the Public Register on the grounds that its disclosure

(a) would be contrary to the interests of national security?; or YES ☐ NO ☒

(b) would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate commercial interest? YES ☐ NO ☒

1. Project Title and Payment Details

Please give a brief identifiable description, including location, of the project:

Fin Fish treatments (using Excis, Salmosan/Vet, Alphamax and Hydrogen Peroxide) in Wellboats located at Sgian Dubh, Loch Striven

Payment: Enclosed payment ☐ BACS ☐ OR Invoice ☒

2. Applicant Details

Title Initials Surname

Trading Title (if appropriate) The Scottish Salmon Company

Address: C/O Mid-Strome,
Loch Carron
Ross-Shire, IV54 8TH

Name of contact:
(if different) [redacted]

Position within Company
(if appropriate) [redacted]

Telephone No.
(inc. dialing code) [redacted]

Fax No.
(inc. dialing code)

Company Registration No. SC107275 Email [redacted]@scottishsalmon.com

Is the licence Applicant the proposed licensee? YES ☒ NO ☐

5. Best Practicable Environmental Option (BPEO) Assessment

Has a BPEO been carried out? YES ☐ NO ☒

6. Details of Current Licence (if any)

(a)	Licence reference number	
(b)	Expiry date	
(c)	If no current licence exists, please give reference number(s) for any previous licence(s) held for this operation	04990/13/0

7. Licence Start Date

(a)	When do you wish the licence to start? **(At least 8 weeks are normally required to process the application)**	A.S.A.P
(b)	When are deposit operation(s) likely to be completed? ***(Licences are generally issued for a period of 12 months***	3 year licence requested
(c)	Does the application cover an emergency operation?	YES ☐ NO ☒

Marine Laboratory, PO Box 101, 375 Victoria Road,
Aberdeen AB11 9DB
www.scotland.gov.uk/marinescotland

8. Discharge Location Details

Site name	Zone	Coordinates	Water Depth (m)	Distance from Land (m)	Tidal Streams/ Residual Currents (if known)
Sgian Dubh	19b	55° 55.72'N 005° 04.59'W	60m	200m	

9. Rationale for Proposed Discharge

In order to achieve more effective treatments to control sea lice (Lepeophtheirus salmonis) infection, with less potential for environmental impact due to the greater control and lower concentration of medicine required, Scottish Salmon Company (SSC) have made an application for the use of licensed sea lice medicine bath treatments using well boats.

It is necessary to have a range of medicines available to maintain an effective sea lice treatment strategy. Sea lice chemotherapeutants currently consented for use within Scotland are the in-feed treatments (Slice and Calicide) and the bath treatments (Excis, Salmoan/Vet, Alphamax and Hydrogen Peroxide).

In order to ensure a robust health management strategy and an effective sea lice treatment strategy, it is essential that all available products, and all possible treatment methods, are available for use by the Industry. For this reason, SSC are applying for the use of the following bath treatment medicines to be administered in well boats:

Excis™, (Cypermethrin) SalmoVet® (Azamethiphos) Alphamax™ (Deltamethrin) Hydrogen Peroxide.

The SSC strategy involves the use of in-feed medicines for a longer period during the production cycle, initiating treatments at lower trigger levels, strategic use of treatments to ensure optimum targeting of lice life stages, and focused use of bath treatments later on in the cycle. SSC disease management program has proven highly successful and the additional option of using well-boat treatments will ensure the efficient control of sea lice and high level of fish welfare continues.

10. Details of Material(s) to be Discharged (Please provide Material Safety Data Sheets for each chemical to be discharged).

Proprietary Name of Chemicals or Agents	Chemical Name of Chemicals or Agents
1. Exis	Cypermethrin
2. SalmoVet	Azamethiphos
3. AlphaMax	Deltamethrin
4. Hydrogen Peroxide	Hydrogen Peroxide

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Aberdeen AB11 9DB
www.scotland.gov.uk/marinescotland

11. Post treatment of Chemical(s) or Agent(s) to be Discharged

Will there be any treatment of the agents used prior to deposit/discharge? YES ☒ NO ☐

If **YES**, please give details below:

There will not be specific post treatment of chemicals as such, but significant dilution of the medicinal compounds will occur as water is re-circulated and discharged from the well boat in which the treatment takes place.

12. Details of Scale of Deposit(s)/Discharge(s)

Deposit	Date of Deposit (Approx.)	Duration of Deposit	Weight/Volume of Agent Deposited	Total Volume (including solvent)
1 Exis	Various times throughout the production cycle.	Ronja Viking: 20 minutes to discharge Rune Viking: 15 minutes to discharge Please use existing records for other vessels.	Treatment Dose: 0.5 ml/m^3	Ronja Viking: =500 ml Exis in 2 wells of total volume 1000 m^3 Rune Viking:=325ml Excis in 2 wells of total volume 660 m^3
2 SalmoVet	Various times throughout the production cycle.	Ronja Viking: 20 minutes to discharge Rune Viking: 15 minutes to discharge Please use existing records for other vessels.	Treatment Dose: 0.2g/ m^3	Ronja Viking: =200 g SalmoVet IN 2 WELLS OF TOTAL VOLUME 1000 m^3 Rune Viking: 130g SalmoVet in 2 wells of total volume 660 m^3

3 AlphaMax	Various times throughout the production cycle.	Ronja Viking: 20 minutes to discharge Rune Viking: 15 minutes to discharge Please use existing records for other vessels.	Treatment Dose: 0.2ml/ m^3	Ronja Viking =200 ml AlphaMax IN 2 WELLS OF TOTAL VOLUME 1000 m^3 Rune Viking:130 ml AlphaMax in 2 wells of total volume 660 m^3
4 H_2O_2	Various times throughout the production cycle.	Ronja Viking: 20 minutes to discharge Rune Viking: 15 minutes to discharge Please use existing records for other vessels.	Hydrogen peroxcide is dosed at 1600PPM.	Ronja Viking =1050 m^3 H_2O_2 in 2 wells of total volume. Rune Viking = 660 m^3 H_2O_2 in 2 wells of total volume.
5				

If necessary please continue on a separate sheet and tick this box ☒

13. Details of Deposit/Discharge Procedure(s)

Please provide details for each of the deposits listed in Section 10 above:

Deposit	Origin of Deposit	Method of Deposit	Mode of Deposit	Depth of Deposit	Rate of Deposit
1	Ronja viking Vessel	Discharge pumps	Via pipeline and through valves into discharge pumps	~3.5-4m depth at start, decreasing to 2.5m depth by finish	Total discharge rate of 2000m^3 / hour/ well Each well 500 m^3 Each well 2 pumps
2	Rune Viking Vessel	Discharge pumps on overpressure	Via pipeline	Discharge hose ~ 2m below surface	Total discharge rate of 3000m^3/hour/well. Each well 325m^3 Each well 3 pumps
3	Norholm Vessel	See existing vessel records	See existing vessel records	See existing vessel records	See existing vessel records
4	Ronja nordic Vessel	See existing vessel records	See existing vessel records	See existing vessel records	See existing vessel records
5	Ronja settler Vessel	See existing vessel records	See existing vessel records	See existing vessel records	See existing vessel records

If necessary please continue on a separate sheet and tick this box ☒

14. Details of Vessel Undertaking Discharge

Please provide details for each of the deposits listed in Section 10 above:

Deposit	Name	Registration Details/Call Sign (if appropriate)
1	MV Ronja Viking	M/V Ronja Viking Call Sign LAKA IMO #:9364100
2	M/V Rune Viking	M/V Rune Viking Call sign:3YIW IMO#: 9167954

Marine Laboratory, PO Box 101, 375 Victoria Road,
Aberdeen AB11 9DB
www.scotland.gov.uk/marinescotland

3	M/V Norholm	M/V Norholm Call sign:2BVA2 IMO#: 9139567
4	M/V Ronja Nordic	M/V Ronja Nordic Call sign:LASK IMO#: 9443695
5	M/V Ronja Settler	M/V Ronja Settler Call sign:LAGS IMO#: 9258703

If necessary please continue on a separate sheet and tick this box ☒

15. Details of Operator or Vessel Undertaking Discharge

Please provide details for each of the deposits listed in Section 10 above:

Deposit	Name and Address
1	M/V Ronja Viking Solvtrans AS Brunholmgata 2 6004 Ålesund
2	M/V Rune Viking Johnson Marine Ltd Marine Park Vidlin ZE2 9QB
3	M/V Norholm Details already submitted with previous applications
4	M/V Ronja Nordic Details already submitted with previous applications
5	M/V Ronja Settler Details already submitted with previous applications

If necessary please continue on a separate sheet and tick this box ☒

16. Monitoring of Deposit(s)/Discharge

(a) Do you propose to monitor the deposit(s)/ discharge? YES ☒ NO ☐

(b) Nature of monitoring (eg. visual observation or scientific survey):

Visual observation of plume dispersal and regular benthic sampling regime will assess benthic community.

(c) Details of any scientific survey (eg. fluorimetric measurement of concentrations):

http://publicaccess.argyll-bute.gov.uk/online-applications/simpleSearchResults.do?action=firstPage

17. Consultation with Conservation Bodies

Please provide details of any consultation with Conservation Bodies and, if appropriate, include copies of any correspondence with your application.

Are any parts of the proposed deposit/discharge operations located within the boundaries of a designated conservation area? YES ☐ NO ☒

If **YES**, please indicate approximate distance of the operations from the boundary of the nearest conservation area(s)

Has an Environmental Impact Assessment (EIA)/Environmental Statement (EA) been undertaken to support any application? YES ☒ NO ☐

If **YES**, is a copy of the EIA/ES included with this application? YES ☒ NO ☐

If the EIA/ES has been undertaken but has not been included with this application, please provide an explanation below.

http://publicaccess.argyll-bute.gov.uk/online-applications/simpleSearchResults.do?action=firstPage

Is the EIA/ES available for public inspection? YES ☒ NO ☐

If **YES**, at what locations:

See above link

Declaration

I declare to the best of my knowledge and belief that the information given in this form and related papers is true.

WARNING

It is an offence under the Act under which this application is made to fail to disclose information or to provide false or misleading information.

Signature	[redacted]	1	Date 14/11/16
Name in BLOCK LETTERS	[redacted]		
Position within company (if appropriate)	Environmental Data Planner		

Please check carefully the information you have given and that all the enclosures (including copies) have been included.

Application for Discharge of Treatment Agents in the Territorial Sea and UK Controlled Waters Adjacent to Scotland

(ML-004)

Marine (Scotland) Act 2010

It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Part 4, Section 54 of the Marine (Scotland) Act 2010 and Section 101 of the Marine and Coastal Access Act 2009 all information contained within or provided in support of this application will be placed on the Public Register. There is no national security grounds for application information not going on the Register under the 2010 Act. Under the 2009 Act, application information goes on the Register unless the Secretary of State determines that it's disclosure in the Register would be contrary to the interests of national security.

Public Register

Is there any information contained within or provided in support of this application that you consider should not be included on the Public Register on the grounds that its disclosure

(a) would be contrary to the interests of national security?; or YES ☐ NO ☒

(b) would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate commercial interest? YES ☐ NO ☒

1. Project Title and Payment Details

Please give a brief identifiable description, including location, of the project:

Wellboat treatment with sea lice anti-parasitic, Loch Snizort East, Skye Area

Payment: Enclosed payment ☐ BACS ☐ **OR** Invoice ☒

2. Applicant Details

Title [redacted] Initials [redacted] Surname [redacted]

Trading Title (if appropriate) GREIG SEAFOOD SHETLAND LTD

Address GREMISTA, LERWICK, SHETLAND

Name of contact (if different)

Position within Company (if appropriate)

Telephone No. (inc. dialing code) [redacted] Fax No. (inc. dialing code) (01595) 741806

Company Registration No. 159110 Email [redacted]@griegseafood.com

Is the licence Applicant the proposed licensee? YES ☐ NO ☒

If NO, please complete Section 3 below.

3. Proposed Licensee Details

Title [redacted] Initials [redacted] Surname [redacted]

Trading title (if appropriate) GRIEG SEAFOOD SHETLAND LTD.

Address AS ABOVE

Name of contact (if different) [redacted]

Position within Company (if appropriate) [redacted]

Telephone No. (inc. dialing code) [redacted] Fax No. (inc. dialing code) 01595741806

Company Registration No. 159110 Email [redacted]@griegseafood.com

5. Best Practicable Environmental Option (BPEO) Assessment

Has a BPEO been carried out? YES ☒ NO ☐

6. Details of Current Licence (if any)

(a)	Licence reference number	FS1309
(b)	Expiry date	
(c)	If no current licence exists, please give reference number(s) for any previous licence(s) held for this operation	

7. Licence Start Date

(a)	When do you wish the licence to start? **(At least 8 weeks are normally required to process the application)**	ASAP
(b)	When are deposit operation(s) likely to be completed? ***(Licences are generally issued for a period of 12 months***	3 years
(c)	Does the application cover an emergency operation? **(If YES, please explain in the covering letter)**	YES ☐ NO ☒

8. Discharge Location Details

Site name	Zone	Coordinates	Water Depth (m)	Distance from Land (m)	Tidal Streams/ Residual Currents (if known)
Loch Snizort East FS1309		NG370603	~45	~200	

9. Rationale for Proposed Discharge

WELLBOATS FORM A VITAL PART OF SEA LICE MANAGEMENT. THEY OFFER A CONTROLLED ENVIRONMENT FOR TREATING FISH AND ALLOW THE FARMER TO ROTATE THE USE OF AVAILABLE SEA LICE ANTI-PARASITIC TREATMENTS.

10. Details of Material(s) to be Discharged (Please provide Material Safety Data Sheets for each chemical to be discharged).

Proprietary Name of Chemicals or Agents	Chemical Name of Chemicals or Agents
SALMOSAN/SALMOSAN VET	AZAMETHIPHOS
AMX	DELTAMETHRIN
EXCIS	CYPERMETHRIN
INTEROX PARAMOVE 50	HYDROGEN PEROXIDE

11. Post treatment of Chemical(s) or Agent(s) to be Discharged

Will there be any treatment of the agents used prior to deposit/discharge? YES ☐ NO ☒

If YES, please give details below:

12. Details of Scale of Deposit(s)/Discharge(s)

Deposit	Date of Deposit (Approx.)	Duration of Deposit	Weight/Volume of Agent Deposited	Total Volume (including solvent)
1	PERIODICALLY AVERAGING 1 – 2 X YEAR	15 MIN EVERY 4-6HRS, 4-6 DEPOSITS EVERY 24HRS, 12-24 DEPOSITS PER WHOLE SITE TREATMENT	TYPICALLY: 50-200g SALMOSAN 200ml AMX 500ml EXCIS <3200l H_2O_2	1000m^3 at: 0.05-0.2ppm 0.2ppm 0.5ppm 1600ppm

Marine Laboratory, PO Box 101, 375 Victoria Road,
Aberdeen AB11 9DB
www.scotland.gov.uk/marinescotland

13. Details of Deposit/Discharge Procedure(s)

Please provide details for each of the deposits listed in Section 10 above:

Deposit	Origin of Deposit	Method of Deposit	Mode of Deposit	Depth of Deposit	Rate of Deposit
1	VESSEL	DISCHARGE PUMP	PIPELINE	SUBSURFACE 1-2m	3-4000m^3/hr
2					
3					
4					
5					

If necessary please continue on a separate sheet and tick this box ☒

16. Monitoring of Deposit(s)/Discharge

(a) Do you propose to monitor the deposit(s)/ discharge? YES ☐ NO ☒

(b) Nature of monitoring (eg. visual observation or scientific survey):

(c) Details of any scientific survey (eg. fluorimetric measurement of concentrations):

17. Consultation with Conservation Bodies

Please provide details of any consultation with Conservation Bodies and, if appropriate, include copies of any correspondence with your application.

Are any parts of the proposed deposit/discharge operations located within the boundaries of a designated conservation area? YES ☐ NO ☒

If **YES**, please indicate approximate distance of the operations from the boundary of the nearest conservation area(s)

Has an Environmental Impact Assessment (EIA)/Environmental Statement (EA) been undertaken to support any application? YES ☐ NO ☒

Declaration

I declare to the best of my knowledge and belief that the information given in this form and related papers is true.

WARNING

It is an offence under the Act under which this application is made to fail to disclose information or to provide false or misleading information.

Signature	[redacted]	Date	30/08/2017
Name in BLOCK LETTERS	[redacted]		
Position within company (if appropriate)	[redacted]		

Please check carefully the information you have given and that all the enclosures (including copies) have been included.

Scottish Natural Heritage
Dualchas Nàdair na h-Alba
All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Marine Scotland – Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

FAO: [redacted]

2 September 2016

Your Refs:
05995 - Ardintoul, Loch Alsh
05996 - Cairidh, Isle of Skye
05997 - Camus Glas, Loch Sunart
06000 - Ewe, Loch Ewe
06003 - Glencripesdale, Loch Sunart
06009 - Invasion Bay, Loch Sunart
06014 - Torridon, Loch Torridon
06018 - Sconser, Isle of Skye
06021 - Moal Ban, Loch na Cairidh
06027 - Portnalong, Loch Harport

Dear Madam,

Marine (Scotland) Act 2010, Part 4 Marine Licensing
Wellboat discharge

Thank you for your recent consultations regarding wellboat licences at various fish farms within SNH South Highland Area. Please treat this as our response for all of the above listed consultations and any future applications which meet the criteria outlined below. We are happy to discuss any issues raised and would still wish to be consulted on non-standard or novel cases.

Summary

We understand that it is your policy not to grant well boat discharge licences where the volumes of chemicals or specified time-frames differ from the corresponding SEPA CAR licence. Assuming that to be the case, we advise that, outside designated sites, discharge of those chemicals from a well boat alongside the cages would not raise any additional natural heritage issues and we would have no objection to the granting of the license.

Within designated sites significant effects are possible but we are not in a position to provide you with detailed advice. We recommend dialogue between MS-LOT, SNH and SEPA as the best way to resolve any outstanding issues.

Scottish Natural Heritage, King's House, The Green, Portree, Isle of Skye, IV51 9BS
Tel: 01478 612625 www.snh.gov.uk

Dualchas Nàdair na h-Alba, Taigh an Rìgh, An Àilean, Port Rìgh, An t-Eilean Sgitheanach, IV51 9BS
Fòn: 01478 612625 www.snh.gov.uk

Appraisal of the impacts of the proposal and advice

Accuracy of information provided by the applicant

We are not routinely consulted on CAR licences for fish farms and do not have full access to SEPA's database, so we are not in a position to advise whether the information provided by the applicant is accurate. We understand that the CAR information that you use is obtained direct from the applicant and therefore there is the possibility (which we have seen in a minority of cases) for the applicant to provide you with an out-of-date CAR licence. There is also the possibility that SEPA may alter the CAR licence part way through the Marine Licence period (e.g. to restrict biomass). In our view it is the applicant's responsibility to ensure that any discharge is consistent with both the latest CAR licence and Marine Licence. You may wish to highlight this to applicants.

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)

Within SACs and SPAs the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the site before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (http://www.snh.gov.uk/docs/A423286.pdf).

SEPA consider the effect of all proposed CAR amendments on SACs and have Habitats Regulations Appraisals (HRA) for each SAC, with sections relating to each fish farm site. They also have generic HRA for SPA bird species as well as otters and seals. Significant changes are assessed and the relevant HRA updated. SEPA have indicated to us that they are happy to provide you with copies of these assessments via the SEPA Marine Science aquaculture staff (Naveed Bhatti or Mhairi Wilson, both based in the SEPA Dingwall office). We recommend that you obtain copies in order to decide whether you wish to adopt their scientific appraisal as part of your HRA.

The SEPA HRA assessments that we have seen consider the effect of sea lice chemicals but do not specifically consider wellboat discharges. It seems likely that the chemical discharge plume from a wellboat will vary in comparison with a discharge plume from a tarpaulin. However we do not have technical expertise to assess whether any differences are significant or whether they fall within the tolerances of the existing dispersion modelling. We recommend that you clarify this aspect with SEPA modellers.

SEPA are unlikely yet to have specifically considered the effects of chemicals on the features of proposed marine SACs and SPAs (such as harbour porpoise in Inner Hebrides and Minches proposed Special Area of Conservation (pSAC)). However since the Scottish Government has a policy of protecting such sites as if they were designated these also need to be included in your HRA. It seems likely to us that features will be protected by the existing safeguards built into CAR. However we recommend that you confirm this understanding with SEPA.

Use of wellboats may slightly increase boat traffic around the fish farms and this would not be assessed as part of CAR. However collision and disturbance risks for harbour porpoise from vessels of the type specified are unlikely to be significant although they may contribute to potential cumulative effects. In our view, no additional management is required for vessel activity providing best practice is followed. Further advice is available in '*Inner Hebrides and the Minches proposed SAC - Advice to support management*' at www.snh.gov.uk/docs/A1918723.pdf

In a similar way, we would not consider collision and disturbance risks for seals, otters and seabirds to be significant where these are features of SACs and SPAs, providing best practice is followed.

Marine Protected Areas (MPAs)

Where proposals lie within Nature Conservation Marine Protected Area (NC MPA) the requirements of the Marine (Scotland) Act 2010 apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the NC MPA before it can be consented.

SEPA have confirmed that they will consider impacts on the MPA when a new CAR variation is submitted. However, in most cases the MPAs will have been designated subsequent to the last CAR licence so that assessment won't yet have been carried out. Also in the majority of cases impacts on the MPA features can be regarded as existing and part of the base-line condition of the feature at the time of designation. In our view, while wellboat discharges are capable of affecting the protected features of the NC MPA, these effects are insignificant. Further assessment is therefore not required.

An exception may occur where features have conservation objectives to 'recover' rather than 'maintain' (the latter applies to the majority of features). For example maerl beds in Wester Ross MPA. It would be sensible to discuss those particular cases with SNH and SEPA. However it seems likely that any impacts will relate primarily to the discharge rather than how it is discharged and therefore would be best tackled via CAR.

Non-designated sites

Outside designated sites we advise that the discharge of chemicals from a well boat alongside the fish farm cages would not raise any additional natural heritage issues beyond those already considered by SEPA as part of the CAR process and we would have no objection to the granting of the license.

Yours sincerely,

Alex Turner
Area Officer
Skye and Lochalsh, South Highland
alex.turner@snh.gov.uk

From:	Roddy MacMinn
To:	"Marine Licencing (MSLOT) (ms.marinelicensing@scotland.gsi.gov.uk)"
Subject:	06216 - Reibinish, East Loch Tarbert - Wellboat Discharge - Scottish Salmon Company - SNH Response March 2017
Date:	14 March 2017 11:05:00

Dear MSLOT

Thank you for your recent consultation.

In our view a marine licence application to allow the discharge of chemicals from wellboats, where there are **no changes to levels of chemicals used within existing CAR licences**, will not raise any additional natural heritage issues which have not already been considered through CAR.

We therefore do not need to be consulted on any Marine Licences for wellboat discharges unless:

a) Marine Scotland considers that there will be Likely Significant Effect (LSE) on a European designated site (SAC or SPA)
b) Marine Scotland considers that the activity is capable of affecting, other than insignificantly, the protected features of a Nature Conservation MPA
c) The wellboat discharge varies from the existing approved CAR licence; or
d) There is no CAR licence in place / chemicals are proposed which are not licensable under CAR.

From the information provided it does not appear to be the case that this application meets any of the above criteria? Therefore we are content for Marine Scotland to proceed to a determination without further reference to SNH.

With best wishes

Roddy

Roddy MacMinn | Operations Officer | Scottish Natural Heritage |
32 Francis Street | Stornoway | Isle of Lewis | HS1 2ND | Tel: 01851 705258

From:	Donna Yule
To:	"MS.MarineLicensing@gov.scot"
Subject:	RE: 06267 - Scottish Sea Farms Ltd - Wellboat - Westerbister Scapa Flow, Orkney – Consultation – Response Required by 23 March 2017
Date:	22 March 2017 10:23:00
Attachments:	image001.png

Dea [redacted]

SNH ref: CNS/MFF/ORK/Westerbister (CLC145091)

Thank you for consulting SNH on this application from Scottish Sea Farms Ltd for a Marine Licence for the discharge of waste sea lice treatment chemicals from wellboats at the new Westerbister salmon farm in Orkney.

We have previously advised SEPA on the CAR licence application on 17 February 2016, and have no additional comments to make with respect to this Marine Licence application for use of wellboats to administer the specified treatments.

Point to note: The Westerbister site does lies within the recently designated area Scapa Flow pSPA although this does not affect our advice regarding the use of wellboats at this site.

Kind regards
Donna

Donna Yule
Operations Officer, Orkney

Scottish Natural Heritage | 54-56 Junction Road | Kirkwall | Orkney | KW15 1AW
Direct dial: 01856 886157
Extension: 7206157
e-mail: Donna.yule@snh.gov.uk

From: [redacted]@gov.scot
To: NORTH; MS.FFPlanning@gov.scot
Subject: 06267 – Scottish Seafarms Ltd - Wellboat - Westerbister Scapa Flow, Orkney - Licence Issue
Date: 05 April 2017 11:08:06
Attachments: image001.png
Final Licence.pdf

Dear Sir/Madam

Attached you will find a Scottish Seafarms Ltd - Wellboat - Westerbister Scapa Flow, Orkney

Should you have any further questions, please do not hesitate to contact me.
Kind Regards
[redacted]

[redacted]
Marine Scotland - Marine Planning & Policy

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

Direct Line: +44 [redacted]
General Queries: +44 (0)1224 295 579
Fax: +44 (0)1224 295 524
Email: [redacted]@gov.scot
Website: http://www.gov.scot/Topics/marine/Licensing/marine

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

LICENCE FOR DISCHARGE OF USED CHEMICALS FROM WELLBOATS

Licence Number: 06267/17/0 Reference Number: 06267

The Scottish Ministers (hereinafter referred to as "the licensing authority") hereby authorise:

Scottish Sea Farms Ltd
South Shian
Connel
by Oban
Argyll
PA37 1SB

to deposit in the sea the chemicals or agents particulars of which are described in Part 1 of the attached Schedule. The licence is subject to the conditions of use set out, or referred to, in Part 2 of the said Schedule.

This licence is valid from 05 April 2017 until 04 April 2020

Signed: [redacted]

For and on behalf of the licensing authority

Date: 05 April 2017

SCHEDULE TO LICENCE NUMBER: 06267/17/0 DATED: 05 APRIL 2017

Part 1 – Particulars

1. Name and address of the person(s) discharging the used chemical(s) or agent(s):

   The licensee will discharge the used chemical(s) or agent(s)

2. Name and address of any other agents acting on behalf of the licensee (if appropriate):

   As per licensee

3. Name(s) of the vessel(s) to be employed to undertake the discharge operations:

   See Annex One of this licence to discharge for a list of authorised vessels.

   The agent or licensee must notify the licensing authority immediately if a vessel not listed on the licence is to be used for the discharge of used chemical(s) or agent(s). The information required by the licensing authority regarding the additional vessel(s) will be the same as the information already provided for the vessels on the existing licence. **Discharge operations using any additional vessel(s) may only commence if a revised licence, including details of the additional vessel(s), is issued by the licensing authority.**

4. Location of discharge of the used chemical(s) or agent(s):

   Westerbister, Scapa Flow at a point located by the coordinates

   58° 54.38' N, 002° 57.10' W

5. Description of the chemical(s) or agent(s):

   Excis (1% w/v cypermethrin – cis 40 : trans 60)
   ALPHA MAX/AMX (1% deltamethrin)
   Salmosan/Salmosan Vet/Azasure (50% w/w azamethiphos)
   Hydrogen peroxide

   As described in the application dated 20 January 2017 and supporting documentation.

6. Quantity for discharge within the period of validity of the licence:

   As described in Condition 12, Condition 13, Condition 14 and Condition 15 in Part 2 of the licence.

SCHEDULE TO LICENCE NUMBER: 06267/17/0 DATED: 05 APRIL 2017

Part 2 - Conditions

1. The licensee shall notify the licensing authority, at least two working days in advance of starting the operation, with the date and time of commencement of all operations undertaken under the authority of this licence and the product name and quantity of chemical(s) or agent(s) intended for discharge. Details of chemical(s) or agent(s) discharged shall also be recorded and reported in accordance with Condition 11 of the licence.

2. The treatment of fish should be carried out in such a way as to minimise the discharge of chemical(s) or agent(s).

3. "*Force majeure*" may apply when, due to stress of weather or any other cause, it is necessary to discharge the chemicals or agents at a location other than that specified in Part 1 of the Schedule because the safety of human life, or a vessel or vehicle, is threatened. If chemicals or agents are discharged in an unauthorised area, full details of the circumstances shall be immediately notified to the licensing authority (see also notes appended to the Schedule).

4. Under the authority of this licence, the discharge of chemical(s) or agent(s) is only permitted if the location described in Part 1, section 4 of the Schedule is an operational and stocked fish farm. Furthermore, the said discharge is only permitted in respect of the treatment of fish being reared at the fish farm site at the location described in Part 1, section 4 of the Schedule, at the time of discharge.

5. The licensee shall ensure that no dead fish are discharged to the water environment at any time. Any dead fish shall be disposed of above the Mean High Water Springs in an appropriate manner.

6. The licensee shall ensure that works will only be carried out in accordance with the Treatment Procedure (dated 06 March 2014) as provided with the application and Marine Scotland Licensing Operations Team (MS-LOT) shall be informed if alterations are made to the treatment procedure. Copies of the treatment procedure must be kept with copies of the licence.

7. Only those chemicals or agents described in Part 1, section 5 of the Schedule (the authorised deposits) shall be discharged under authority of the licence and all associated tank/hopper washings shall be discharged at the location(s) specified in Part 1, section 4 of the Schedule.

8. The method of discharge shall be:

   Pumped discharge via pipe/hatches from Wellboat at a depth of surface to 2 metres below sea surface.

9. Only those persons acting on behalf of, and authorised by, the agent or the licensee shall undertake the discharge operations.

10. The licensee shall provide the Master(s) of the vessel(s) employed to undertake the discharge operations with a copy of the licence. The licensee shall also ensure that copies of the licence and all other relevant documents, including the treatment procedure (dated 06 March 2014) are available for inspection by any authorised Enforcement Officer at:

    a) the premises of the licensee; and

    b) on board the vessel(s) employed to undertake the discharge operations.

11. The licensee shall ensure that a log of operations is maintained and kept on board the discharge vessel(s) throughout each discharge operation, and be available for inspection by an authorised Enforcement Officer. The logs shall be retained for a period of six calendar months following expiry of the licence.

    For each discharge operation, the following information must be recorded:

    a) the name of the vessel;

    b) the name of the product and its active ingredient;

    c) the quantity (volume) of the product scheduled for discharge;

    d) the date, time and position of each discharge operation;

    e) the weather, including wind strength and direction, sea and tidal state throughout each discharge operation;

    f) the rate of discharge during each discharge operation, if appropriate, and the duration of each discharge operation if the rate of discharge is not constant, the maximum and mean rates of discharge should be indicated);

    g) report on each discharge operation, including details of any problems; and an explanation for any delays; and

    h) the signature of the Master at the foot of each page of each record.

    The above information can be entered on the discharge vessel log of operation form. The licensee shall provide to MS-LOT at three monthly intervals or on request from MS-LOT, a copy of all or any part of the records specified above.

12. The licensee shall ensure that:

    a) subject to condition 12 b), the total quantity of cypermethrin as contained in the trade product Excis, discharged in any consecutive 3 hour period beginning at the time of the

first release of Excis as part of any specific treatment, shall not exceed 30.89 grams (this is equivalent to 3089 millilitres of Excis).

b) Cypermethrin, as contained in the trade product Excis, shall not be discharged if deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, has been discharged at the premises in the previous 3 hours.

13. The licensee shall ensure that the total quantity of azamethiphos, as contained in the trade product Salmosan or Salmosan Vet or Azasure, discharged in any consecutive 24 hour period beginning at the time of the first release of Salmosan or Salmosan Vet or Azasure as part of any specific treatment, shall not exceed 500.4 grams (this is equivalent to 1000.8 grams of Salmosan or Salmosan Vet or Azasure).

14. The licensee shall ensure that:

a) subject to condition 14 b), the total quantity of deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, discharged in any consecutive 3 hour period beginning at the time of the first release of deltamethrin, formulated as AMX™ 10 mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, as part of any specific treatment shall not exceed 11.58 grams (this is equivalent to 1158 millilitres of AMX™ or ALPHA MAX™).

b) Deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, shall not be discharged if cypermethrin, as contained in the trade product Excis, has been discharged at the premises in the previous 3 hours.

15. Hydrogen peroxide may be discharged at any time provided its actual use is recorded and reported in accordance with Part 2, section 11 of this licence.

16. In the event of the licensee becoming aware of any changes to the information on which the issue of the licence was based, the licensing authority shall be immediately notified of the details.

17. The licensee shall ensure that where any of the chemical(s) or agent(s) listed in Condition 12, 13 and 14 are also authorised for discharge to the water environment following bath treatment at the fish holding cages at the site described in Part 1, section 4 under an authorisation granted by Scottish Environment Protection Agency then the quantity of that chemical or agent discharged over the time period specified in the relevant condition by the method specified in Condition 8 and from the cages over the same time period shall not exceed the total quantity specified in the relevant condition.

18. The licensee shall ensure that the chemical(s) or agent(s) listed above shall only be discharged following treatment of fish within the vessel(s) listed in Part 1, section 3.

SCHEDULE TO LICENCE NUMBER: 06267/17/0 DATED: 05 APRIL 2017

19. If a new licence is required, the licensee shall make an application at least twelve weeks before the expiry date of this licence. **This licence shall not continue in force after the expiry date of 04 April 2020**.

NOTES

1. You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the licensed operations. The issue of the licence does not absolve the licensee from obtaining such authorisations, consents etc which may be required under any other legislation.

2. In the event that the licensee wishes any of the particulars set down in the Schedule to be altered, the licensing authority shall be immediately notified of the alterations. It should be noted that changes can invalidate a licence, and that an application for a new licence may be necessary.

3. Under Section 30 of the Marine (Scotland) Act 2010, the licensing authority may vary, suspend or revoke the licence, if it appears to the authority that there has been a breach of any of the provisions of the licence or for any other reason that appears to be relevant to the authority.

4. Under Section 39 of the Marine (Scotland) Act 2010, it is an offence to carry on a licensable marine activity or cause or permit any other person to carry on such an activity without a marine licence or fails to comply with any condition of a marine licence. It is a defence for a person charged with an offence under Section 40 in relation to any activity to prove that the activity was carried out for the purpose of saving life, or for the purposes of securing the safety of a vessel, aircraft or marine structure ('*force majeure*'), and that the person took steps within a reasonable time to provide full details of the incident to the licensing authority. (Under Annex II, Article 7 of the Convention for the Protection of the Marine Environment of the North-east Atlantic, the licensing authority is obliged to immediately report '*force majeure*' incidents to the Convention Commission).

5. <u>All correspondence or communications relating to the licence should be addressed to</u>:

Licensing Operations Team
Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Tel: (01224) 295579
Fax: (01224) 295524

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Scottish Sea Farms Ltd** sites.

a) Froyfisk	***b) Froyhav***	***c) Gripfisk***	***d) Norholm***
e) Ronja	***f) Ronja Atlantic***	***g) Ronja Carrier***	***h) Ronja Commander***
i) Ronja Harvester	***j) Ronja Nordic***	***k) Ronja Pioneer***	***l) Ronja Settler***
m) Ronja Skye	***n) Ronja Superior***	***o) Ronja Viking***	***p) Roy Kristian***
q) Victoria Lady	***r) Victoria Viking***	***s) Migdale***	

The agent or licensee must notify the licensing authority immediately if a vessel not listed on the licence is to be used for the discharge of used chemical(s) or agent(s). The information required by the licensing authority regarding the additional vessel(s) will be the same as the information already provided for the vessels on the existing licence. **Discharge operations using any additional vessel(s) may only commence if a revised licence, including details of the additional vessel(s), is issued by the licensing authority.**

Signed: [redacted]

For and on behalf of the licensing authority

Date: 05 April 2017

From: [redacted]@gov.scot
To: NORTH
Subject: 06332 - Loch Duart Ltd - Wellboat discharge, Torr Mor, Clashnessie Bay - Consultation - Response Required by 18 May 2017
Date: 11 May 2017 14:52:10
Attachments: image001.png
Loch Duart Torr Mor signed application form.pdf
Application Form Wellboat Licence_Loch Duart Torr Mor_Attachment 1_Chart....pdf

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Dear Sir/Madam,

Apologies for the short turnaround but I would be grateful if a response could be provided as soon as possible. I would be grateful if you are able to provide a response before 18th May, however if you have any issue with this please contact me on the number below.

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

06332 - Loch Duart Ltd - Wellboat discharge, Torr Mor, Clashnessie Bay

CO-ORDINATES 58° 14.926' N 005° 15.368' W

A marine licence has been requested under the above Act to discharge waste sea lice treatment chemicals from wellboats below the level of Mean High Water Springs has been applied for at the above site.

Circulation of large quantities of information duplicated in these applications has been a cause for concern amongst consultees in the past, therefore only the application and chart has been included for comment. Please don't hesitate to contact Marine Scotland - Licensing Operations Team (MS-LOT) should you have any additional requests. You may, for example, wish to see the CAR licence that licences the discharge of the chemicals from the cages, prior to passing comment.

Should you have any comments on these proposals, I would be grateful if they could be forwarded to me in an electronic format (MS.MarineLicensing@gov.scot) or as a hard copy within 14 days of the date of this email.

If you require an extension to the consultation period, please inform me in writing as soon as possible and within 7 days of this email. A maximum two week extension to the consultation period will only be granted where significant concerns are raised.

If an extension request or a written reply to this consultation is not received within 7 days, it will be assumed that you are content with the proposals.

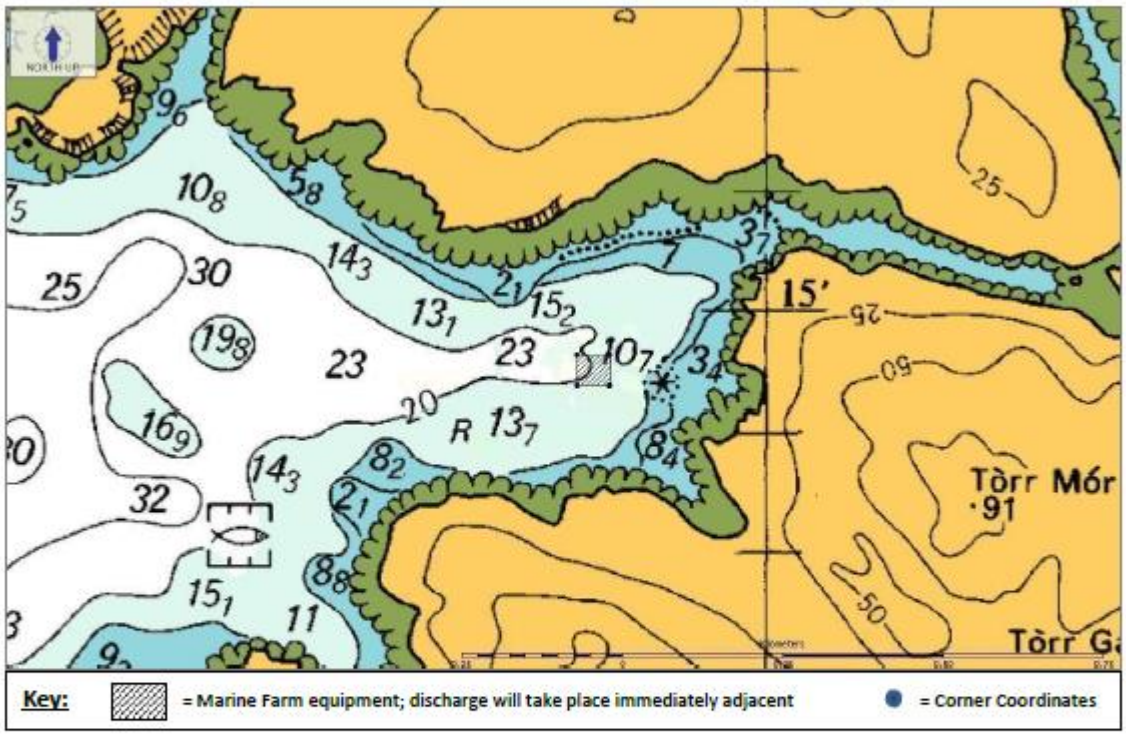
Marine Scotland - Licensing Operations Team will send you a copy of any licence that is subsequently issued for the proposed works.

Kind regards,

[redacted]
Marine Scotland - Marine Planning & Policy

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

Chart Extract



Location	Latitude	Longitude
NW Corner	58° 14.926′ N	005° 15.368′ W
NE Corner	58° 14.927′ N	005° 15.316′ W
SW Corner	58° 14.907′ N	005° 15.366′ W
SE Corner	58° 14.908′ N	005° 15.315′ W

Marine Licence Application for Discharge of Treatment Agents from a Wellboat

Version 1.0

Marine (Scotland) Act 2010

It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Section 54 of the Marine (Scotland) Act 2010, all information contained within and provided in support of this application will be placed on a Public Register. There are no national security grounds for application information not going on the Register under the 2010 Act

6. Wellboat Discharge Details

a) Brief description of the discharge including rationale for discharge:

This application is for permission to utilize licensed medicinal products for the treatment of Atlantic salmon in a wellboat as part of an integrated pest management plan for the control of sea lice or amoebic gill disease. Products that may be used contain the active ingredients azamethiphos (Salmosan Vet, Salmosan), hydrogen peroxide (Paramove 50), and deltamethrin (AMX). The ability to utilize these treatments in a wellboat if required will allow optimal management of fish health and welfare in Clashnessie Bay (FHI Reg. No. FS0933).

(b) Proposed start date (Target duration for determination of a marine licence application is 14 weeks):

j 24/04/2017

(c) Proposed completion date:

30/11/2019

d) Location:

The discharge is proposed to take place immediately alongside marine farm equipment moored at the Torr Mor site, Clashnessie Bay, with corner coordinates as follows:

Latitude and Longitude co-ordinates (WGS84) defining the proposed discharge point (continue on Aooendix 01 Additional Co-ordinates form if necessarv):

Latitude										Longitude									
58°	14		92	7	'N					00	5°	15		31	6	'W			
58°	14		90	8	' N					00	5°	15		31	5	·W			
58°	14		92	6	' N					00	5°	15		36	8	·W			
58°	14		90	7	'N					00	5°	15		36	6	'W			

e) Water depth and distance from land:

Water Depth (metres)	**Distance from Land** (metres/kilometres)
16.4m CD	**100m (minimum distance to MLWS)**

(f) Is the discharge site located within the jurisdiction of a statutory harbour authority?

YES D NO lii

If **YES**, please specify statutory harbour authori

(g) Potential impacts the works may have (including details of areas of concern e.g designated conservation and shellfish harvesting areas) and proposed mitigation in response to potential impacts (continue on separate sheet if necessary):

The proposed works involve the occasional and temporary presence of a wellboat vessel at the site and associated discharge of licensed medicinal products. Potential impacts and associated mitigation are listed below:
- Water column & benthic impacts from discharge of licensed medicines:An assessment of environmental safety for these products has been conducted by SEPA and discharge permitted under the existing CAR License. As such, nonegative impacts are identified. Furthermore, the controlled conditions afforded by wellboat treatment should benefit efficacy of any treatments carried out,minimizing the overall quantities of any medcines discharged.
- Other marine users:Wellboat operations will be occasional in frequency,short in duration and replace operation of other vessels for conventional tarpaulin treatments. As such,no negative interactions with other users of the area surrounding the farm are anticipated.
- Adjacent Freshwater Pearl Mussel SAC interests: There will be no impact on freshwater systems from wellboat treatment operations occurring in the marine environment. The option to treat under controlled wellboat conditions will benefit health management for farms in the area,and as such any risk of potential interaction with wild salmonids as host of Freshwater Pearl Mussel larvae will be minimized.
- Assynt-Coigach National Scenic Area:As above proposed wellboat presence will be occasional and temporary, and inthe immediate vicinity of the existing marine farm permitted in the area. As such no negative visual impacts are anticipated.

7. **Details of Treatment Agent(s) to be Discharged** (Please provide Material Safety Data Sheets for each chemical to be discharged).

Proprietary Name of Treatment Agent(s)	Chemical Name of Treatment Agent(s)
Salmosan Vet, Salmosan	Azamethiphos
Paramove	Hydrogen Peroxide
AMX	Deltamethrin
-	-
-	-

8. Details of Discharge (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Date of Discharge (approx.)	Duration of Discharge (minutes)	WeightNolume of Agent (grams/cubic metres)	Total Volume (including solvent) (cubic metres)
1	Periodically 24104/17 to end of cycle	10 mins	40g / 3hr, 120g / 24hr	400
2	Periodically 24104/17 to end of cycle	20 mins	3 cubic meters	1000
3	Periodically 24104/17 to end of cycle	20 mins	2g / 3hr	1000
4	-	-	-	-
5	-	-	-	-

9. Details of Discharge Procedure (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Method of Deposit	Mode of Deposit	Depth of Deposit (metres)	Rate of Deposit (litres or cubic metres per second/minute/hour}
1	Discharge pump	Valve	2 - 3	2400 cubic meters per hr
2	Discharge pump	Valve	2 - 3	3000 cubic meters per nr
3	Discharge pump	Valve	2 - 3	3000 cubic meters per hr
4	-	-	-	-
5	-	-	-	-

10. Details of Vessel(s) Undertaking Discharge (continue on a separate sheet if necessary):

Vessel Name	Registration Details/Call Sign (if appropriate)	Name and Address of Operator
MV Ronja Commander	IMO 9276183	Marine Harvest (Solvtrans) Blar Mhor Industrial Estate Fort William PH33 ?PT Scotland
MV Ronja Pioneer	IMO 9345520	Marine Harvest (Solvtrans) Blar Mhor Industrial Estate Fort William PH33 ?PT Scotland
MV Ronja Challenger	IMO 9765067	Marine Harvest (Solvtrans) Blar Mhor Industrial Estate Fort William PH33 ?PT Scotland

MV Inter Caledonia	IMO 9745756	Marine Harvest (Intership) Blar Mhor Industrial Estate Fort William PH33 ?PT Scotland
MV Migdale	IMO 9220689	Migdale Transport Ltd Dornoch Road, Bonar Bridge Sutherland IV24 3EB Scotland
MV Viking Atlantic	IMO 9167954	Johnson Marine Ltd Marine Park, Vidlin Shetland ZE2 9QB
MV Solundoy	IMO 9158654	Johnson Marine Ltd Marine Park, Vidlin Shetland ZE2 9QB

11. **Scotland's National Marine Plan**

Have you considered the application with reference to Scotland's National Marine Plan? YES liiNO D

If YES, provide details of considerations made including reference to the policies that have been considered:

Chapter 7 Aquaculture Objective 1 - The option to undertake treatments in a controlled wellboat environment if required supports the objective of sustainable and economically viable aquaculture production, whilst minimizing environmental impacts through optimal treatment efficacy and reduced medicinal discharges.
Chapter 7 Aquaculture Policy 11 - The ability to perform treatments in wellboats represents optimization of equipment and activities to minimize emissions.
Chapter 7 Aquaculture Key Issues:
7.5 & 7.8 - The proposal supports economic benefit to rural & coastal communities in Highland & Islands regions directly through successful operation of the marine farm and through the supply chain e.g. charter of wellboat vessels.
7.12 - The proposal will be of benefit to an integrated plan for the management of sea lice.
7.16 - The application supports a strategic approach to health management, providing another management tool, should promote treatment efficacy and is for the licensing of discharge from a wellboat as referenced.
7.18 - The proposal should minimize potential for interaction with other sectors such as wild fish interests by optimizing sea lice control options available.

1. Applicant Details

Titl[redacted] Initia[redacted] Surnam[redacted]

Trading Title (ifappropriate): Loch Duart Ltd

Address: Badcall Salmon House, Scourie, By Lairg, Sutherland IV27 4TH

Name of contact (if different): n/a

Telephone No. (inc.dialing code)[redacted]

Emai[redacted]@lochduart .com

From: Kate Thompson
Sent: 18 May 2017 11:38
To: Liam Wright
Cc: Tamara Lawton; Sue Agnew
Subject: Query re well boat application - Clashnessie bay fishfarm
Importance: High

Hi Liam,

Hope all well with you.

As Sue is currently fully occupied with AECs, I have been passed a consultation from Marine Scotland regarding application for administration of chemical treatments at Torr Mor, Clashnessie. Based on the FHI Reg Number given in the application (FS0933) the farm in question is http://aquaculture.scotland.gov.uk/data/site_details_record.aspx?site_id=FS0933 named Clashnessie Bay. However, I am a bit confused as the data for this site refer to an old CAR licence (CAR/L/1015768/v3 issued on 23/8/2008 and with Licence Site ID OLD1 Oldany). However, within the "Consultation" box in the application form, the applicant refers to CAR/L/1090313. In Scotland's Aquaculture this is shown as issued 30/6/2011 with site ID TMOR1 Torr Mor (see http://aquaculture.scotland.gov.uk/data/licence_conditions_record.aspx?licence_id=CAR/L/1090313&sepa_site_id=TMOR1) In the Scotland's Aquaculture website, this licence is not shown against any site and GeoView (NMPi layers) shows site FS0933, named Clashnessie Bay, as an active site at NC088336 with an inactive site reference FS1273 named Torr Morr slightly to SE at NC090335. When I click on the link to Scotland Aquaculture it comes up with no details found for this site (i.e. FS1273).

In checking through eRDMs to try to get background on this, I found attached response re the original application for CAR/L/1090313 and also to a more recent planning application relating to proposed change in configuration at a site identified as holding CAR licence CAR/L/1015768. These highlight concerns about impact on FWPM in neighbouring SACs

The treatments and dosages for which the operator is now seeking a marine licence to administer using a well boat are in line with CAR/L/1090313, but not CAR/L/1015768/v3 (which does not include any use of Azamethiphos) and, as outlined above, I'm confused as to which CAR licence and site is being referred to. Normally, when we get such applications here, where it is clear which site is being referred to and what current treatments are permitted within CAR I would send a response something like:

"Thank you for consulting SNH on this application from xxx for a Marine Licence for the discharge of waste sea lice treatment chemicals from wellboats at their SIT NAME salmon farm in Orkney.

The application indicates that the types of chemicals and their maximum permitted quantities and rates of discharge are identical to those already specified within the existing CAR licence (CAR REF) for this site and that, following treatments, the residual chemicals will be discharged to the environment from within the farm cages, as would be the case with in-cage treatment.

We have previously advised SEPA on the CAR licence application and have no additional

comments to make with respect to this Marine Licence application for use of wellboats to administer the specified treatments."

My questions are:

1) Should I be concerned about what is actually being requested here (in which case I would propose to go back to MS seeking clarification)?
2) If we are satisfied that we know which site this refers to, and what the current CAR licence permits, would a response as above be appropriate or should we be reiterating concerns about FWPM etc ?

I'm copying in Tamara, as well as Sue, as I think she may also have previously handled aquaculture casework in this area and may perhaps be able to shed some light as to what is actually in place

MS are asking for rapid response on this (we received consultation on 11th and they are asking if we can respond before tomorrow). However, as today is the first day I've been able to get into internet to try to work out which site/CAR I we are looking at, I'm going to go back to MS and advise that it will be next week before we can respond.

I'll also put this advice request through CMS.

From: Liam Wright
Sent: 18 May 2017 12:17
To: Kate Thompson
Cc: Tamara Lawton; Sue Agnew
Subject: RE: Query re well boat application - Clashnessie bay fishfarm

Hi Kate,

I wouldn't worry about getting too bogged down in the detail with this. I think the sites in Eddrachillis Bay get rotated and there have been various CAR iterations over the years, so I imagine this is why it all seems a bit confusing and doesn't quite add up.

No need to worry about the discharge of chemicals in relation to the FWMP.

I think it would be fine for you just to say that provided the discharges are in line with the current CAR licence for this site then we would have no further comments to make and leave it at that. Most case officers are just responding with a no comment as standard for wellboat discharges as the discharges have already been consented by SEPA through CAR. In the foreseeable future wellboat licencing is going to be amalgamated with the CAR process so this will simplify things going forward.

Hope this helps but happy to discuss further.

From: Kate Thompson
To: Liam Wright
Cc: Tamara Lawton; Sue Agnew
Subject: RE: Query re well boat application - Clashnessie bay fishfarm
Date: 18 May 2017 12:29:15

Hi Liam,

I'd be more than happy with that if ops colleagues in the area are content; I usually just run a quick check to ensure that chemicals and dosages being asked for in the ML application are in line with relevant CAR Licence, but from what you say perhaps we should be leaving that to MS and making the response more generic. Certainly in this case, trying to do that check has generated lots of confusion for me (not helped by not knowing the area in question).

It will certainly be helpful when the two processes are amalgamated.

Cheers

Kate

Kate Thompson

Operations Officer, Orkney, NINH

Direct Dial 01856 886156 ***Kirkwall Office*** 01856 875302

From: Tamara Lawton
To: Kate Thompson
Cc: Sue Agnew; Liam Wright
Subject: RE: Query re well boat application - Clashnessie bay fishfarm
Date: 18 May 2017 12:53:11
Attachments: A2072039.obr

Hi Kate, I have attached Alex's generic response for wellboat licences, if that's useful. I have also used it for wellboat licence applications. It does have a bit of a South Highland focus as it refers to the porpoise SAC, but could be adapted for this application.

Cheers,
Tamara

From: Kate Thompson
To: Tamara Lawton
Cc: Sue Agnew; Liam Wright; Donna Yule
Subject: RE: Query re well boat application - Clashnessie bay fishfarm
Date: 18 May 2017 13:02:42

Hi Tamara,

Many thanks – that looks very useful as a way of highlighting that there could be discrepancies and where the responsibility for ensuring that this is not the case should sit as well as flagging any relevant sensitivities in the area.

Cheers

Kate

Kate Thompson

Operations Officer, Orkney, NINH

Direct Dial 01856 886156 ***Kirkwall Office*** 01856 875302

From: [redacted]@gov.scot [mailto[redacted]@gov.scot]
Sent: 25 May 2017 12:56
To: Stephen Austin
Subject: FW: 05886 Variation - Marine Harvest (Scotland) Ltd - Wellboat Discharge - Port na Cro, Shuna Sound - Consultation – Response Required by 16 May 2017

Dear Stephen,

Thank you for your earlier phone call. I can confirm that the quantities of Azamethiphos, Cypermethrin and Deltamethrin have all been increased on the CAR variation. Would you like me to send through the amounts?

Kind regards,
[redacted]

From: [redacted]@gov.scot [mailto[redacted]@gov.scot]
Sent: 25 May 2017 13:13
To: Stephen Austin
Subject: RE: 05886 Variation - Marine Harvest (Scotland) Ltd - Wellboat Discharge - Port na Cro, Shuna Sound - Consultation – Response Required by 16 May 2017

Azamethiphos 3 hour period 295.1g (590.2g Salmosan/Salmosan Vet) to 315.4g (630.8g Salmosan/Salmosan Vet)
24 hour period 345.6 (691.2g Salmosan/Salmosan Vet) to 427.5g (855g Salmosan/Salmosan Vet)

Cypermethrin 3 hour period 52.92g (5292ml Excis) to 57.10g (5710ml Excis)

Deltamethrin 3 hour period 19.85g (1985ml ALPHAMAX/AMX) to 21.4g (2140ml ALPHAMAX/AMX)

Many thanks,
[redacted]

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]
Sent: 30 May 2017 13:53
To: SOUTH_HIGHLAND; MS.FFPlanning@gov.scot
Subject: 06024 & 06026 – Marine Harvest (Scotland) Ltd – Wellboat Discharge, Linnhe, Loch Linnhe & Leven, Loch Leven - Consultation – Response Required by 13 June 2017

Dear Sir/Madam,

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

06024 – Marine Harvest (Scotland) Ltd – Wellboat Discharge, Linnhe, Loch Linnhe
06026 – Marine Harvest (Scotland) Ltd – Wellboat Discharge, Leven, Loch Leven

CO-ORDINATES

06024: 56° 43.820' N 005° 14.988' W
06026: 56° 41.350' N 005° 07.964' W

A marine licence has been requested under the above Act to discharge waste sea lice treatment chemicals from wellboats below the level of Mean High Water Springs has been applied for at the above **2** sites.

Circulation of large quantities of information duplicated in these applications has been a cause for concern amongst consultees in the past, therefore only the application and chart has been included for comment. Please don't hesitate to contact Marine Scotland - Licensing Operations Team (MS-LOT) should you have any additional requests. You may, for example, wish to see the CAR licence that licences the discharge of the

chemicals from the cages, prior to passing comment.

Should you have any comments on these proposals, I would be grateful if they could be forwarded to me in an electronic format (MS.MarineLicensing@gov.scot) or as a hard copy within 14 days of the date of this email.

If you require an extension to the consultation period, please inform me in writing as soon as possible and within 14 days of this email. A maximum two week extension to the consultation period will only be granted where significant concerns are raised.

If an extension request or a written reply to this consultation is not received within 14 days, it will be assumed that you are content with the proposals.

Marine Scotland - Licensing Operations Team will send you a copy of any licence that is subsequently issued for the proposed works.

Kind regards,

[redacted]

Marine Scotland - Marine Planning & Policy

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

General Queries: +44 (0)1224 295 579
Fax: +44 (0)1224 295 524
Email: ms.marinelicensing@gov.scot
Website: http://www.gov.scot/Topics/marine/Licensing/marine

From: Stephen Austin
To: [redacted]@gov.scot"; MS.MarineLicensing@scotland.gsi.gov.uk
Subject: RE: 05886 Variation - Marine Harvest (Scotland) Ltd - Wellboat Discharge - Port na Cro, Shuna Sound - Consultation – Response Required by 16 May 2017
Date: 02 June 2017 10:44:00
Attachments: image001.png

Hi [redacted]

05886 Variation - Marine Harvest (Scotland) Ltd - Wellboat Discharge - Port na Cro, Shuna Sound

Thank you for consulting SNH on the above mentioned variation. SNH have no comments to make in relation to the proposed increases of Azamethiphos, Cypermethrin and Deltamethrin.

Thanks

Stephen

Stephen Austin | Operations Officer | Scottish Natural Heritage
Cameron House | Albany Street | Oban | Argyll | PA34 4AE | Tel 0300 244 9360 | Mobile [redacted]

Stephen Austin |Oifigear Obraichean | Dualchas Nàdair na h-Alba
Taigh Chamshron | Sràid Albany | An t-Òban | Earra- Ghàidheal | PA34 4AE | Fòn: 0300 244 9360 | Fòn-laimhe [redacted]

From: Tamara Lawton
To: "MS.MarineLicensing@gov.scot"
Subject: RE: 06024 & 06026 – Marine Harvest (Scotland) Ltd – Wellboat Discharge, Linnhe, Loch Linnhe & Leven, Loch Leven - Consultation – Response Required by 13 June 2017
Date: 15 June 2017 16:50:00
Attachments: image001.png

Dear [redacted] thank you for your consultation on the marine licence request for wellboat discharge on Loch Linnhe and Loch Leven.

We understand that it is your policy not to grant well boat discharge licences where the volumes of chemicals or specified time-frames differ from the corresponding SEPA CAR licence. Assuming that to be the case, we advise that, outside designated sites, discharge of those chemicals from a well boat alongside the cages would not raise any additional natural heritage issues.

Kind regards,
Tamara

Tamara Lawton
Operations Officer
Scottish Natural Heritage/Dualchas Nàdair na h-Alba
17 Pulteney Street/17 Sràid Pholtanaidh
Ullapool/Ulapul
Wester Ross/Ros an Iar
IV26 2UP
01854 613418

From:	Tamara Lawton
To:	"MS.MarineLicensing@gov.scot"
Subject:	RE: 06010v - Marine Harvest (Scotland) Ltd - Wellboat Variation - Kingairloch, Loch a choire. Loch Linnhe - Consultation - Response Required by 18 July 2017
Date:	17 July 2017 12:58:00
Attachments:	image001.png

Dear [redacted] many thanks for your email consultation on the wellboat variation licence application for the above site.

Outside designated sites, we advise that the discharge of chemicals from a well boat alongside the fish farm cages would not raise any additional natural heritage issues beyond those already considered by SEPA as part of the CAR process and we would have no objection to the granting of the licence.

Kind regards,
Tamara

Tamara Lawton
Operations Officer
Scottish Natural Heritage/Dualchas Nàdair na h-Alba
17 Pulteney Street/17 Sràid Pholtanaidh
Ullapool/Ulapul
Wester Ross/Ros an Iar
IV26 2UP
01854 613418

Scottish Natural Heritage
Dualchas Nàdair na h-Alba
All of nature for all of Scotland
Nàdar air fad airson Alba air fad

[redacted]
Marine Scotland – Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

18 July 2017
Your Ref: 05997v

Dear [redacted]

Marine Harvest (Scotland) - Wellboat Licence variation - Camus Glas, Loch Sunart

Thank you for your recent consultation regarding a wellboat licence variation for the above fish farm.

Summary
We understand that it is your policy not to grant well boat discharge licences where the volumes of chemicals or specified time-frames differ from the corresponding SEPA CAR licence. Assuming that to be the case, we advise that within designated sites significant effects are possible but we are not in a position to provide you with detailed advice.

Appraisal of the impacts of the proposal and advice

Sunart Special Area of Conservation (SAC)
Within SACs the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the site before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (http://www.snh.gov.uk/docs/A423286.pdf).
SEPA consider the effect of all proposed CAR amendments on SACs and have Habitats Regulations Appraisals (HRA) for each SAC, with sections relating to each fish farm site. Significant changes are assessed and the relevant HRA updated. SEPA have indicated to us that they are happy to provide you with copies of these assessments via the SEPA Marine Science aquaculture staff. We recommend that you obtain copies in order to decide whether you wish to adopt their scientific appraisal as part of your HRA.
The SEPA HRA assessments that we have seen consider the effect of sea lice chemicals but do not specifically consider wellboat discharges. It seems likely that the chemical discharge plume from a wellboat will vary in comparison with a discharge plume from a tarpaulin. However we do not have technical expertise to assess whether any differences are

significant or whether they fall within the tolerances of the existing dispersion modelling. We recommend that you clarify this aspect with SEPA modellers.

Loch Sunart Marine Protected Area
Where proposals lie within Nature Conservation Marine Protected Area (NC MPA) the requirements of the Marine (Scotland) Act 2010 apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the NC MPA before it can be consented. SEPA have confirmed that they will consider impacts on the MPA when a new CAR variation is submitted. In the majority of cases impacts on the MPA features can be regarded as existing and part of the base-line condition of the feature at the time of designation. In our view, while wellboat discharges are capable of affecting the protected features of the NC MPA, these effects are insignificant. Further assessment is therefore not required.

Yours sincerely,

Tamara Lawton
Operations Officer
South Highland
tamara.lawton@snh.gov.uk

Scottish Natural Heritage
Dualchas Nàdair na h-Alba
All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Marine Scotland – Licensing Operations Team
Scottish Government
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

1 August 2017

Your Ref: 06384/06380/06378/06381/06383 - Scottish Sea Farms - Wellboat Discharge - Shetland, Various Sites

FAO: [redacted]

Dear Sir/Madam,

Marine (Scotland) Act 2010, Part 4 Marine Licensing
Wellboat discharge

Thank you for your recent consultation.

Summary

We provide this advice on the understanding that it is your policy to grant wellboat discharge licences only where the types and volumes of chemicals or specified timeframes match those permitted by the corresponding SEPA CAR licence.

We therefore advise that the proposed discharge has already been considered by SEPA through the CAR licencing process and deemed unlikely to cause any significant natural heritage effects.

We recommend you consult with SEPA in order to:

1) ensure that the information supplied by the applicant is accurate and confirms with the most up-to-date CAR licence
2) confirm that you are content with SEPA's assessment of any effects on Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), where this is relevant (Annex 1).
3) confirm that you are content with SEPA's assessment of any effects on NC MPAs, where this is relevant. (Annex 2)

Scottish Natural Heritage, Ground Floor, Stewart Building, Alexandra Wharf, Lerwick, Shetland, ZE1 0LL
Tel: 01595 693345 north@snh.gov.uk www.snh.gov.uk

Yours sincerely,

Juan

Juan Brown
Operations Officer
Scottish Natural Heritage, Ground Floor, Stewart Building, Alexandra Wharf, Lerwick, Shetland ZE1 0LL
Tel 01595 693345

a) **Annex 1. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)**

b) Within SACs and SPAs the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the site before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (http://www.snh.gov.uk/docs/A423286.pdf).

c) SEPA consider the effect of all proposed CAR licences and amendments on SACs and have Habitats Regulations Appraisals (HRA) for each SAC, with sections relating to each fish farm site. They also have a generic HRA for SPA bird species as well as otters, harbour porpoise and seals. SEPA have indicated to us that they are happy to provide you with copies of these assessments via the SEPA Marine Science aquaculture staff (Mhairi Wilson, based in the SEPA Dingwall office).

d) We recommend that you obtain copies in order to decide whether you wish to adopt their scientific appraisal as part of your HRA.
e) We recommend that you seek clarification from SEPA that their HRA assessments are adequate to include the effects of wellboat discharges.

f) The Scottish Government has a policy of protecting proposed marine SACs and SPAs (such as harbour porpoise in Inner Hebrides and Minches proposed Special Area of Conservation (pSAC)).

g) We therefore recommend that you seek clarification from SEPA that the CAR licence addresses this requirement satisfactorily. It seems likely to us that features will be protected by the existing safeguards built into CAR.

h) Annex 2. Marine Protected Areas (MPAs)

i) Where proposals lie within a Nature Conservation Marine Protected Area (NC MPA) the requirements of the Marine (Scotland) Act 2010 apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the NC MPA before it can be consented.

j) SEPA consider the impact of chemical discharges on the MPA through the CAR licencing process. SEPA have indicated to us that they are happy to provide you with copies of these assessments via the SEPA Marine Science aquaculture staff.

k) We recommend that you obtain copies in order to decide whether you wish to adopt their MPA assessment.

l) We recommend that you seek clarification from SEPA that their assessments are adequate to include the effects of wellboat discharges.

m) In some cases the most up-to-date CAR licence may pre-date MPA designation. In such cases SEPA will not yet have undertaken an assessment. However, in the majority of these cases any pre-existing discharges will be regarded as part of the baseline condition of the MPA at the time of designation. Therefore while these wellboat discharges are capable of affecting the protected features of the NC MPA, as the impacts form part of the baseline condition these effects are likely to be considered insignificant.

T: +44 (0)1224 295579
E: ms.marinelicensing@gov.scot

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING LICENCE

FOR DISCHARGE OF USED CHEMICALS FROM WELLBOATS

Licence Number: 06440/17/0 Reference Number: 06440

The Scottish Ministers (hereinafter referred to as "the licensing authority") hereby authorise:

The Scottish Salmon Company
Mid Strome
Lochcarron
Ross-Shire
IV54 8YH

to deposit in the sea the chemicals or agents particulars of which are described in Part 1 of the attached Schedule. The licence is subject to the conditions of use set out, or referred to, in Part 2 of the said Schedule.

This licence is valid from 29 August 2017 until 28 August 2020.

Signed: [redacted]

For and on behalf of the licensing authority

Date: 29 August 2017

SCHEDULE TO LICENCE NUMBER: 06440/17/0 DATED: 29 August 2017

Part 1 – Particulars

1. Name and address of the person(s) discharging the used chemical(s) or agent(s):

   The licensee will discharge the used chemical(s) or agent(s)

2. Name and address of any other agents acting on behalf of the licensee (if appropriate):

   As per licensee

3. Name(s) of the vessel(s) to be employed to undertake the discharge operations:

   See Annex One of this licence to discharge for a list of authorised vessels.

   The agent or licensee must notify the licensing authority immediately if a vessel not listed on the licence is to be used for the discharge of used chemical(s) or agent(s). The information required by the licensing authority regarding the additional vessel(s) will be the same as the information already provided for the vessels on the existing licence. **Discharge operations using any additional vessel(s) may only commence if a revised licence, including details of the additional vessel(s), is issued by the licensing authority.**

4. Location of discharge of the used chemical(s) or agent(s):

   Loch Tuath, Isle Of Mull at a point located by the coordinates:

   56° 29.58' N 006° 11.64' W.

5. Description of the chemical(s) or agent(s):

   Excis (1% w/v cypermethrin – cis 40 : trans 60)
   ALPHA MAX or AMX (1% deltamethrin)
   Salmosan or Salmosan Vet or Azasure (50% w/w azamethiphos)
   Hydrogen peroxide

   As described in the application dated 28 June 2017 and supporting documentation.

6. Quantity for discharge within the period of validity of the licence:

   As described in Condition 12, Condition 13, Condition 14 and Condition 15 in Part 2 of the licence.

SCHEDULE TO LICENCE NUMBER: 06440/17/0 DATED: 29 August 2017

Part 2 - Conditions

1. The licensee must notify the licensing authority, at least two working days in advance of starting the operation, with the date and time of commencement of all operations undertaken under the authority of this licence and the product name and quantity of chemical(s) or agent(s) intended for discharge. Details of chemical(s) or agent(s) discharged must also be recorded and reported in accordance with Condition 11 of the licence.

2. The treatment of fish must be carried out in such a way as to minimise the discharge of chemical(s) or agent(s).

3. "*Force majeure*" may apply when, due to stress of weather or any other cause, it is necessary to discharge the chemicals or agents at a location other than that specified in Part 1 of the Schedule because the safety of human life, or a vessel or vehicle, is threatened. If chemicals or agents are discharged in an unauthorised area, full details of the circumstances must be immediately notified to the licensing authority (see also notes appended to the Schedule).

4. Under the authority of this licence, the discharge of chemical(s) or agent(s) is only permitted if the location described in Part 1, section 4 of the Schedule is an operational and stocked fish farm. Furthermore, the said discharge is only permitted in respect of the treatment of fish being reared at the fish farm site at the location described in Part 1, section 4 of the Schedule, at the time of discharge.

5. The licensee must ensure that no dead fish are discharged to the water environment at any time. Any dead fish must be disposed of above the Mean High Water Springs in an appropriate manner.

6. The licensee must ensure that works will only be carried out in accordance with the Treatment Procedure (dated 02 November 2016) as provided with the application and Marine Scotland Licensing Operations Team (MS-LOT) must be informed if alterations are made to the treatment procedure. Copies of the treatment procedure must be kept with copies of the licence.

7. Only those chemicals or agents described in Part 1, section 5 of the Schedule (the authorised deposits) shall be discharged under authority of the licence and all associated tank/hopper washings must be discharged at the location(s) specified in Part 1, section 4 of the Schedule.

8. The method of discharge must be:

   Pumped discharge via pipe/hatches from Wellboat at a depth of surface to 2 metres below sea surface.

9. Only those persons acting on behalf of, and authorised by, the agent or the licensee shall undertake the discharge operations.

10. The licensee must provide the Master(s) of the vessel(s) employed to undertake the discharge operations with a copy of the licence. The licensee must also ensure that copies of the licence and all other relevant documents, including the treatment procedure (dated 02 November 2016) are available for inspection by any authorised Enforcement Officer at:

    a) the premises of the licensee; and

    b) on board the vessel(s) employed to undertake the discharge operations.

11. The licensee must ensure that a log of operations is maintained and kept on board the discharge vessel(s) throughout each discharge operation, and be available for inspection by an authorised Enforcement Officer. The logs must be retained for a period of six calendar months following expiry of the licence.

    For each discharge operation, the following information must be recorded:

    a) the name of the vessel;

    b) the name of the product and its active ingredient;

    c) the quantity (volume) of the product scheduled for discharge;

    d) the date, time and position of each discharge operation;

    e) the weather, including wind strength and direction, sea and tidal state throughout each discharge operation;

    f) the rate of discharge during each discharge operation, if appropriate, and the duration of each discharge operation if the rate of discharge is not constant, the maximum and mean rates of discharge must be indicated);

    g) report on each discharge operation, including details of any problems; and an explanation for any delays; and

    h) the signature of the Master at the foot of each page of each record.

    The above information can be entered on the discharge vessel log of operation form. The licensee must provide to MS-LOT at three monthly intervals or on request from MS-LOT, a copy of all or any part of the records specified above.

12. The licensee must ensure that:

    a) subject to condition 12 b), the total quantity of cypermethrin as contained in the trade product Excis, discharged in any consecutive 3 hour period beginning at the time of the first release of Excis as part of any specific treatment, must not exceed 28.5 grams (this is equivalent to 2850 millilitres of Excis).

b) Cypermethrin, as contained in the trade product Excis, must not be discharged if deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, has been discharged at the premises in the previous 3 hours.

13. The licensee must ensure that the total quantity of azamethiphos, as contained in the trade product Salmosan or Salmosan Vet or Azasure, discharged in any consecutive 24 hour period beginning at the time of the first release of Salmosan as part of any specific treatment, must not exceed 154.2 grams (this is equivalent to 308.4 grams of Salmosan or Salmosan Vet or Azasure).

14. The licensee must ensure that:

a) subject to condition 14 b), the total quantity of deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, discharged in any consecutive 3 hour period beginning at the time of the first release of deltamethrin, formulated as AMX™ 10 mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, as part of any specific treatment must not exceed 10.68 grams (this is equivalent to 1068 millilitres of AMX™ or ALPHA MAX™).

b) Deltamethrin, formulated as AMX™ 10mg/ml concentrate solution for fish treatment or as ALPHA MAX™ marketed by Pharmaq AS, must not be discharged if cypermethrin, as contained in the trade product Excis, has been discharged at the premises in the previous 3 hours.

15. Hydrogen peroxide may be discharged at any time provided its actual use is recorded and reported in accordance with Part 2, section 11 of this licence.

16. In the event of the licensee becoming aware of any changes to the information on which the issue of the licence was based, the licensing authority must be immediately notified of the details.

17. The licensee must ensure that where any of the chemical(s) or agent(s) listed in Condition 12, 13 and 14 are also authorised for discharge to the water environment following bath treatment at the fish holding cages at the site described in Part 1, section 4 under an authorisation granted by Scottish Environment Protection Agency then the quantity of that chemical or agent discharged over the time period specified in the relevant condition by the method specified in Condition 8 and from the cages over the same time period must not exceed the total quantity specified in the relevant condition.
18. The licensee must ensure that the chemical(s) or agent(s) listed above must only be discharged following treatment of fish within the vessel(s) listed in Part 1, section 3.

19. If a new licence is required, the licensee must make an application at least twelve weeks before the expiry date of this licence. **This licence shall not continue in force after the expiry date of 28 August 2020**.

NOTES

1. You are deemed to have satisfied yourself that there are no barriers, legal or otherwise, to the carrying out of the licensed operations. The issue of the licence does not absolve the licensee from obtaining such authorisations, consents etc which may be required under any other legislation.

2. In the event that the licensee wishes any of the particulars set down in the Schedule to be altered, the licensing authority must be immediately notified of the alterations. It should be noted that changes can invalidate a licence, and that an application for a new licence may be necessary.

3. Under Section 30 of the Marine (Scotland) Act 2010, the licensing authority may vary, suspend or revoke the licence, if it appears to the authority that there has been a breach of any of the provisions of the licence or for any other reason that appears to be relevant to the authority.

4. Under Section 39 of the Marine (Scotland) Act 2010, it is an offence to carry on a licensable marine activity or cause or permit any other person to carry on such an activity without a marine licence or fails to comply with any condition of a marine licence. It is a defence for a person charged with an offence under Section 40 in relation to any activity to prove that the activity was carried out for the purpose of saving life, or for the purposes of securing the safety of a vessel, aircraft or marine structure ("*force majeure*"), and that the person took steps within a reasonable time to provide full details of the incident to the licensing authority. (Under Annex II, Article 7 of the Convention for the Protection of the Marine Environment of the North-east Atlantic, the licensing authority is obliged to immediately report '*force majeure*' incidents to the Convention Commission).

5. <u>All correspondence or communications relating to the licence should be addressed to:</u>

Licensing Operations Team
Marine Scotland
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB

Tel: (01224) 295579

marinescotland

Scottish Government
Riaghaltas na h-Alba
gov.scot

T: +44 (0)1224 295579
E: ms.marinelicensing@gov.scot

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

LICENCE FOR DISCHARGE OF USED CHEMICALS FROM WELLBOATS

Licence Number: 06369/17/0 Reference Number: 06369

The Scottish Ministers (hereinafter referred to as "the licensing authority") hereby authorise:

The Scottish Salmon Company
Mid Strome
Lochcarron
Ross-Shire
IV54 8TH

to deposit in the sea the chemicals or agents particulars of which are described in Part 1 of the attached Schedule. The licence is subject to the conditions of use set out, or referred to, in Part 2 of the said Schedule.

This licence is valid from 18 September 2017 until 17 September 2020

Signed: [redacted]

For and on behalf of the licensing authority

Date: 18 September 2017

ANNEX ONE

Vessels authorised to be used for the discharge of used sealice treatment chemicals at licensed **The Scottish Salmon Company** sites under the following licences:

1.	05206/17/0	29 October 2017
2.	05209/17/0	29 October 2017
3.	05443/17/0	27 May 2018
4.	05950/17/0	18 December 2019
5.	06198/17/0	25 May 2020
6.	06199/17/0	08 June 2020
7.	06200/17/0	25 May 2020
8.	06201/17/0	25 May 2020
9.	06202/17/0	25 May 2020
10.	06214/17/1	29 March 2020
11.	06216/17/1	29 March 2020
12.	06218/17/1	29 March 2020
13.	06219/17/1	29 March 2020
14.	06307/17/0	20 July 2020
15.	06340/17/0	13 August 2020
16.	06399/17/0	23 August 2020
17.	06368/17/0	28 August 2020
18.	06394/17/0	28 August 2020
19.	06402/17/0	28 August 2020
20.	06440/17/0	28 August 2020
21.	06363/17/0	29 August 2020
22.	06364/17/0	29 August 2020
23.	06365/17/0	29 August 2020
24.	06367/17/0	07 September 2020
25.	06372/17/0	07 September 2020
26.	06395/17/0	07 September 2020
27.	06401/17/0	07 September 2020
28.	06460/17/0	12 September 2020
29.	06369/17/0	17 September 2020

a) Ronja Viking	***b) Ronja Nordic***	***c) Ronja Settler***
d) Ronja Supporter	***e) Norholm***	***f) Viktoria Viking***
g) Gripfisk	***h) Robris***	***i) Viktoria Lady***
j) Ronja Pioneer	***k) Rostein***	***l) Rohav***
m) Sordyroy	***n) Viking Atlantic***	

marinescotland

The Scottish Government

T: +44 (0)1224 295579 F: +44 (0)1224 295524
E: MS.MarineLicensing@scotland.gsi.gov.uk

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

LICENCE FOR DISCHARGE OF USED CHEMICALS FROM WELLBOATS

Licence Number: 05354/17/0 Reference Number: 05354

Scottish Ministers (hereinafter referred to as "the licensing authority") hereby authorise:

Scottish Sea Farms Ltd
South Shian
Connel
by Oban
Argyll
PA37 1SB

to deposit in the sea the chemicals or agents particulars of which are described in Part 1 of the attached Schedule. The licence is subject to the conditions of use set out, or referred to, in Part 2 of the said Schedule.

This licence shall be valid from 27 September 2017 until 19 December 2017

Signed: [redacted]

For and on behalf of the licensing authority

Date: 27 September 2017

SCHEDULE TO LICENCE NUMBER: 05354/17/0 DATED: 27 September 2017

Part 1 – Particulars

1. Name and address of the person(s) discharging the used chemical(s) or agent(s):

   The licensee will discharge the used chemical(s) or agent(s)

2. Name and address of any other agents acting on behalf of the licensee (if appropriate):

   As per licensee

3. Name(s) of the vessel(s) to be employed to undertake the discharge operations:

   See Annex One of this licence to discharge for a list of authorised vessels.

   The agent or licensee must notify the licensing authority immediately if a vessel not listed on the licence is to be used for the discharge of used chemical(s) or agent(s). The information required by the licensing authority regarding the additional vessel(s) will be the same as the information already provided for the vessels on the existing licence. **Discharge operations using any additional vessel(s) may only commence if a revised licence, including details of the additional vessel(s), is issued by the licensing authority.**

4. Location of discharge of the used chemical(s) or agent(s):

   Kerrera B, Firth of Lorn, at a point located by the coordinates:

   56° 25.16' N 005° 30.76' W

5. Description of the chemical(s) or agent(s):

   Excis (1% w/v cypermethrin – cis 40 : trans 60)
   ALPHA MAX (1% deltamethrin)
   Salmosan or Salmosan Vet (50% w/w azamethiphos)
   Hydrogen peroxide

   As described in the application dated 29 July 2014 and supporting documentation.

6. Quantity for discharge within the period of validity of the licence:

   As described in Condition 12, Condition 13, Condition 14 and Condition 15 in Part 2 of the licence.

ANNEX ONE

Vessels authorised to be used for chemical discharge at licensed **Scottish Sea Farms** sites.

- 06384/17/1 29 August 2020
- 06383/17/0 29 August 2020
- 06381/17/0 29 August 2020
- 06380/17/0 29 August 2020
- 06378/17/0 29 August 2020
- 06377/17/0 09 August 2020
- 06379/17/0 09 August 2020
- 06382/17/0 09 August 2020
- 06385/17/0 09 August 2020
- 06386/17/0 09 August 2020
- 06332/17/0 18 May 2020
- 06267/17/0 4 April 2020
- 06203/17/0 25 May 2020
- 06095/16/0 19 Dec 2019
- 05857/16/0 20 April 2019
- 05856/16/0 20 April 2019
- 05855/16/0 20 April 2019
- 05654/16/1 19 Jan 2019
- 05612/15/0 21 Jan 2019
- 05425/16/2 13 April 2018
- 05424/16/1 13 April 2018
- 05423/16/1 13 April 2018
- 05422/16/1 13 April 2018
- 05421/16/1 13 April 2018
- 05420/16/1 13 April 2018
- 05419/16/1 13 April 2018
- 05418/16/1 13 April 2018
- 05415/16/2 13 April 2018
- 05414/16/1 13 April 2018
- 05413/16/1 13 April 2018
- 05412/16/1 13 April 2018
- 05411/16/1 13 April 2018
- 05410/16/1 13 April 2018
- 05409/16/1 13 April 2018
- 05408/16/1 13 April 2018
- 05407/16/1 13 April 2018
- 05361/15/0 22 June 2018
- 05360/16/0 19 Dec 2017
- 05359/16/1 19 Dec 2017
- 05358/16/0 19 Dec 2017
- 05357/16/0 19 Dec 2017
- 05356/16/0 19 Dec 2017
- 05355/16/0 19 Dec 2017
- 05354/17/0 19 Dec 2017
- 05353/16/0 19 Dec 2017
- 05352/16/0 19 Dec 2017
- 05351/16/0 19 Dec 2017
- 05350/16/0 19 Dec 2017

a) Oylaks	*b) Ronja Pacific*	*c) Gripfisk*	*d) Norholm*
e) Ronja	*f) Ronja Atlantic*	*g) Ronja Carrier*	*h)Migdale*
i) Ronja Harvester	*j) Ronja Nordic*	*k) Ronja Pioneer*	*l) Ronja Settler*
m) Ronja Skye	*n) Ronja Superior*	*o) Ronja Viking*	*p) Roy Kristian*
q) Victoria Lady	*r) Victoria Viking*	*s) Ronja Commander*	

The agent or licensee must notify the licensing authority immediately if a vessel not listed on the licence is to be used for the discharge of used chemical(s) or agent(s). The information required by the licensing authority regarding the additional vessel(s) will be the same as the information already provided for the vessels on the existing licence. **Discharge operations using any additional vessel(s) may only commence if a revised licence, including details of the additional vessel(s), is issued by the licensing authority.**

Signed: [redacted]

For and on behalf of the licensing authority

Date: 27 September 2017

From: MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]
Sent: 22 January 2018 13:44
To: SOUTH_HIGHLAND; MS.FFPlanning@gov.scot
Subject: 06575 - Grieg Seafood Shetland Limited - Wellboat Discharge - Loch Snizort East, Skye - Consultation - Response Required by 19 February 2018

Dear Sir/Madam,

MARINE (SCOTLAND) ACT 2010, PART 4 MARINE LICENSING

Grieg Seafood Shetland Limited - Wellboat Discharge - Loch Snizort East, Skye

CO-ORDINATES 57° 33.362' N 006° 23.909' W

Please note: the co-ordinates noted in the attached application form show the boundary of the marine farm. The co-ordinates noted above is for the wellboat discharge.

A marine licence has been requested under the above Act to discharge waste sea lice treatment chemicals from wellboats below the level of Mean High Water Springs has been applied for at the above site.

Circulation of large quantities of information duplicated in these applications has been a cause for concern amongst consultees in the past, therefore only the application and chart has been included for comment. Please don't hesitate to contact Marine Scotland - Licensing Operations Team (MS-LOT) should you have any additional requests. You may, for example, wish to see the CAR licence that licences the discharge of the chemicals from the cages, prior to passing comment.

Should you have any comments on these proposals, I would be grateful if they could be forwarded to me in an electronic format (MS.MarineLicensing@gov.scot) or as a hard copy within 14 days of the date of this email.

If you require an extension to the consultation period, please inform me in writing as soon as possible and within 14 days of this email. A maximum two week extension to the consultation period will only be granted where significant concerns are raised.

If an extension request or a written reply to this consultation is not received within 14 days, it will be assumed that you are content with the proposals.

Marine Scotland - Licensing Operations Team will send you a copy of any licence that is subsequently issued for the proposed works.

Kind regards,

[redacted]

Marine Scotland - Marine Planning & Policy

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

General Queries: +44 (0)131 244 1734
General Email: MS.marinelicensing@gov.scot
Website: http://www.gov.scot/Topics/marine/Licensing/marine

To: MS.MarineLicensing@scotland.gsi.gov.uk (MS.MarineLicensing@scotland.gsi.gov.uk)
Subject: 06397 - The Scottish Salmon Company - Wellboat Discharge - Taranish, East Loch Roag, Isle of Lewis

Dear Sir/Madam

Marine (Scotland) Act 2010, Part 4 Marine Licensing
06397 – The Scottish Salmon Company - Wellboat discharge – Taranaish, East Loch Roag, Isle of Lewis

Thank you for your recent consultation.

Summary

We provide this advice on the understanding that it is your policy to grant wellboat discharge licences only where the types and volumes of chemicals or specified timeframes match those permitted by the corresponding SEPA CAR licence.

We therefore advise that the proposed discharge has already been considered by SEPA through the CAR licencing process and deemed unlikely to cause any significant natural heritage effects.

We recommend you consult with SEPA in order to:

1) ensure that the information supplied by the applicant is accurate and confirms with the most up-to-date CAR licence
2) confirm that you are content with SEPA's assessment of any effects on Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), where this is relevant (Annex 1).
3) confirm that you are content with SEPA's assessment of any effects on NC MPAs, where this is relevant (Annex 2).

Annex 1. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)

Within SACs and SPAs the requirements of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (the "Habitats Regulations") apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the site before it can be consented (commonly known as Habitats Regulations Appraisal). The SNH website has a summary of the legislative requirements (http://www.snh.gov.uk/docs/A423286.pdf).

SEPA consider the effect of all proposed CAR licences and amendments on SACs and have Habitats Regulations Appraisals (HRA) for each SAC, with sections relating to each fish farm site. They also have a generic HRA for SPA bird species as well as otters, harbour porpoise and seals. SEPA have indicated to us that they are happy to provide you with copies of these assessments via the SEPA Marine Science aquaculture staff (Mhairi Wilson, based in the SEPA Dingwall office).

- We recommend that you obtain copies in order to decide whether you wish to adopt their scientific appraisal as part of your HRA.
- We recommend that you seek clarification from SEPA that their HRA assessments are adequate to include the effects of wellboat discharges.

The Scottish Government has a policy of protecting proposed marine SACs and SPAs (such as harbour porpoise in Inner Hebrides and Minches proposed Special Area of Conservation (pSAC)).

- We therefore recommend that you seek clarification from SEPA that the CAR licence addresses this requirement satisfactorily. It seems likely to us that features will be protected by the existing safeguards built into CAR.

Annex 2. Marine Protected Areas (MPAs)

Where proposals lie within a Nature Conservation Marine Protected Area (NC MPA) the requirements of the Marine (Scotland) Act 2010 apply. Consequently, Marine Scotland is required to consider the effect of the proposal on the NC MPA before it can be consented.

SEPA consider the impact of chemical discharges on the MPA through the CAR licencing process. SEPA have indicated to us that they are happy to provide you with copies of these assessments via the SEPA Marine Science aquaculture staff.

- We recommend that you obtain copies in order to decide whether you wish to adopt their MPA assessment.
- We recommend that you seek clarification from SEPA that their assessments are adequate to include the effects of wellboat discharges.

In some cases the most up-to-date CAR licence may pre-date MPA designation. In such cases SEPA will not yet have undertaken an assessment. However, in the majority of these cases any pre-existing discharges will be regarded as part of the baseline condition of the MPA at the time of designation. Therefore while these wellboat discharges are capable of affecting the protected features of the NC MPA, as the impacts form part of the baseline condition these effects are likely to be considered insignificant.

Yours faithfully

Christine

Christine Moody | Support Officer | Scottish Natural Heritage |
32 Francis Street | Stornoway | Isle of Lewis | HS1 2ND | Tel: 01851 705258

Cairistìona Moody | Oifigear Taic | Dualchas Nàdair na h-Alba
32 Sràid Fhrangain | Steòrnabhagh | Eilean Leòdhais | HS1 2ND | Fòn: 01851 705258

FOI reply from the Scottish Government re. Wellboat licence applications dated 25 October 2017 (via [FOI/17/02190]):

FOI-17-02190 related documents part 1.pdf

134 page PDF | 1.9 MB

Download

MARINE (SCOTLAND) ACT 2010, PART 4: MARINE LICENSING

BEST PRACTICABLE ENVIRONMENTAL OPTION (BPEO) ASSESSMENT: DISCHARGE OF FISH FARM CHEMICAL TREATMENT AGENTS FROM A WELLBOAT

1. Introduction

1.1 Background to application

This Best Practicable Environmental Option (BPEO) assessment supports an application for a sea disposal licence under the Marine (Scotland) Act 2010, Part 4, Marine licensing.

The purpose of this application is to ensure that all possible options are available as a treatment disposal method which in turn allows greater flexibility and allows all options for the fish to have an effective treatment when needed. The sites currently use tarpaulin treatments to administer any necessary sea lice medicines however as a responsible operator we are ensuring that all treatment methods are available to use to use to ensure best welfare of the stock.

1.2 Source of materials

List the treatment products you wish to discharge following treatment.

- **Excis, Alphamax, AMX, Salmosan, Salmosan Vet, Azasure or Paramove 50**

E.g.

Materials –Excis- are supplied by:

Novartis Animal Health UK Ltd
New Cambridge House
Litlington
Nr Royston Dundee
Herts
SG8 0SS

Materials are manufactured by:

Vericore Ltd
Kinnoull Road
Kingsway West
DD2 3XR

Alphamax/AMX

Materials are supplied by:-
AMX™

Company name:PHARMAQ Limited
Address:Unit 15, Sandleheath Industrial Estate
Fordingbridge, Hampshire
SP6 1PA
Telephone:01425 656081
Fax:01425 657992

Materials are manufactured by:-
PHARMAQ AS
Skogmo Industriomrade
N-7863 OVERHALLA,
Norway
Tel - +47 74 28 08 00

Email:orders@pharmaq.no

Website:www.pharmaq.no

Salmosan/Salmosan Vet
Manufacturer/Supplier:
Fish Vet Group Tel: +44 (0) 1463 717774
22 Carsegate Road Fax: +44 (0) 1463 717775
Inverness eMail: info@fishvetgroup.com
IV3 8EX
Scotland UK
· Further information obtainable from:
+44 (0) 1463 717774
eMail: info@fishvet.com
· Emergency telephone number:
UK : +44 (0) 845 0093342
International: +44 (0) 1233 849729 (24/7)

AZASURE
Materials are supplied by:-
Europharma Scotland Ltd.
Unit 5 Dunrobin Court
14 North Avenue
Clydebank Business Park
Clydebank
G81 2QP
Tel +44(0)141 435 7100
Fax: +44(0)141 435 7199

Materials are manufactured by:-

Neptune Pharma Limited,
Regus House,
Victory Way,
Admirals Park,
Crossways,
Dartford,
DA2 6QD

PARAMOVE 50
Materials are supplied by:-

Aqua Pharma Ltd
2 Seafield Road,
Inverness IV1 1SG

Telephone/fax: 44 1463 233361
post@aqua-pharma.no

1.3 Description (nature and volume) of materials

Refer to Product Data Sheets and Material Safety Data Sheet and provide these in Annexes to the BPEO.

Excis™ – Clear, yellow tinted, cutaneous solution for water born use, with an alcoholic odour containing 1% w/v Cypermethrin (cis40:trans60). It is to be administered by addition to seawater. Treatment dose: 0.5m/m^3 sea water. This is equivalent to 5µg cypermethrin/litre sea water.

Alphamax/AMX – Slight yellow liquid, faintly smell of amines, freely soluble in water. 1% w/v Deltamethrin.

Azasure – Fine beige powder in water soluble sachet, 1g of powder contains 500mg Azemethiphos. To achieve a final concentration of 0.1ppm azamethiphos, 0.2g of the power much be added per cubic meter of water, i.e., 1x100g sachet treats 500 cubic meters.

Salmosan – A wettable powder containing 50% w/w azamethiphos for dilution in water and subsequent administration by the bath technique

Salmosan Vet – Azamethiphos 50% w/w powder for suspension for fish treatment. Azamethiphos 500mg/g

Paramove – Hydrogen Peroxide 49.5%, concentrate for solution for fish treatment, the product is a clear colourless liquid

1.4 Details of previous operations including current practice

Please see attached Standard Operating Procedure for bath treatment in tarpaulins and a procedure describing wellboat operations. Dawnfresh Farming hold Car Discharge licences for all the medicines and amounts that would be administered within the wellboat and discharged from the wellboat at the site.

2. Discussion of Available Disposal Options

2.1 Land discharge via an outfall

The volumes of water make land discharge practically and technically unfeasible. Furthermore depths of waters close to the shore don't allow a large vessel to come inshore.

2.2 Sea disposal

2.2.1 Fish farm cages via CAR consent

- CAR licences allow a limited number of cages to be treated per day
- It requires full enclosure tarpaulins that can be difficult to handle when it comes to this size.
- The hydrographic conditions also come into play as strong tidal/freshwater currents can occur in this area.
- Adverse weather conditions affect tarpaulin treatment more than wellboat treatment (waves, wind)
- The risk of fish mortality is increased when using tarpaulins.

2.2.2 Fish farm cages via marine licence

This option is currently being applied for through this Marine (Scotland) Act licence and involves a treatment within a wellboat followed by a discharge at each site. Advantages of this method below:

Treating fish with chemotherapeutants at the fish farm cages in a wellboat gives access to a controlled environment in which to treat the fish. Seawater temperature control in the wells will allow the environment in which to treat the fish that increases the fish welfare during treatment. The volume of seawater in the well is known; this ensures an exact dose of treatment chemical and be administered.

2.2.3 Location other than at fish farm cages

Not allowable under marine licensing at present.

2.3.4 Pre-treatment options prior to discharge at sea

There are no pre-treatment options

3. Aspects to be taken into consideration

For each option identified, the assessment should include reference to the following:

Within Farm Farm Cage via CAR Consent

- Weather conditions, in particular wind, wave and freshwater input action restricts the use of full tarpaulins
- Number of fish held in tarpaulins result in a high oxygen demand during treatment & can be difficult to maintain adequate oxygen levels in the water.
- Stress levels in fish are monitored during treatment
- Risk of fish mortality is increased significantly when using full tarpaulins through oxygen stress & overcrowding, this is overcome with full training.
- Equipment required to supply adequate oxygen (diffusers, ladders, oxygen crates) is an additional obstruction in shallowed cages that can damage and stress the fish.

Fish Farm Cages via Marine licence (wellboat)

- Advantage of using wellboat treatments, is that well volume is absolute and known.
- Well volume and biomass info allows dose to be calculated more accurately, giving a more effective treatment.
- Well boat is particularly useful if grading or transporting fish operations are occurring since the use (and cost) of well boat is already planned.
- Although there are no proven pre-treatment options prior to discharge at sea, there will be dilution of medical compound before discharge from wells.
- During treatment is there is a continuous circulation of water being pumped through the closed wells and following the treatment, there is a continuous recirculation of seawater into the wells.
- There is a possibility that discharge periods could be worked around the tide timetables, since the wellboats can control discharges.
- The wellboat availability is restricted within the loch and may also be postponed at the last minute due to business operations.
- The cost of wellboat hire is very expensive.

3.1 Strategic considerations

3.1.1 Operational aspects, including handling, transport, etc.

All treatments are under veterinary supervision and/or instruction. All operations are carried out following written Standard Operating Procedures (please refer to enclosed document).

3.1.2 Availability of suitable sites/facilities

This falls under the Farming Production Manager responsibility. It consists in booking a suitable wellboat, for a defined period and a defined task.

3.1.3 Legislative implications, both national and international

Marine licence sought.

All sites operated by Dawnfresh Farming Ltd have CAR licences for the discharge of chemicals in 1.2.

3.1.4 Summary of the outcome of discussions with third parties (If possible, copies of consultees replies should be appended to the assessment)

There have been no formal discussions with third parties. However, Dawnfresh Farming is part of a Farm Management Agreement with all other operators in that area where all operators strive to achieve control over sea lice infestations.

3.2 Environmental considerations

3.2.1 Safety implications

Please see attached Material Safety Data Sheet.

3.2.2 Public health implications

The only Public Health implication identified relates to Food Safety, with consumption of medicated fish. As Excis, AlphaMax, Salmosan and SalmosanVet are Prescription Only Medicines, all treated fish undergo a withdrawal period prior to slaughter. Farming traceability system ensures this period is adhered to prior to harvesting. Where shellfish farming interest are located within the vicinity of the fish farm cages they have been consulted during the SEPA licencing process.

3.2.3 Pollution/contamination implications, including discussion on: accumulation, toxicity, hazards, persistence, short and long-term impacts, dilution and dispersion, etc.

SEPA has introduced new thresholds for medicines used to treat sea lice infestations in marine fish farms.

It follows the publication in 2005 of a five-year study monitoring and measuring the potential environmental impacts of using sea lice medicines. The independent PAMP* report confirmed there was no evidence of any impact from these substances on the environment which could be separated from the natural variation found in marine ecosystems.

As a result, the modelling approach, which is currently used to determine the licence, limits for sea lice bath treatments will be changed, extending the time period over

which the dispersal of the medicine is modelled from three to six hours.

The use of the revised modelling approach removes some of the precaution in the way that the sea lice treatment AlphaMAX, Excis, Salmosan and SalmosanVet is licensed, allowing fish farmers to more effectively treat sea lice infestations at marine cage fish farms. More effective treatment of such infestations may lead to benefits for wild salmon populations.

Full details of the PAMP report are available at:
http://www.sams.ac.uk/research/coastal%20impacts/ecol.htm
And the revised modeling documentation can be found at:
http://www.sepa.org.uk/pdf/guidance/fish_farm_manual/annex/G.pdf

3.2.4 Interference with other legitimate activities, e.g. fishing operations, other aquaculture interests

Dawnfresh Farming currently operates under an active Farm Management Agreement which is communicated across other operators with the disease management area. Dawnfresh Farming is the only operator within Loch Etive however, we currently communicate with and have the same goal of achieving zero sea lice on our stock.

3.2.5 Amenity/aesthetic implications

Not applicable

3.2.6 Best practice guidance and mitigation measures

A wellboat allows precise measurement of volume and administration of chemical, possibly resulting in the use of less product than enclosed cages using tarpaulins, the treatment also has the potential to have a more effective treatment due to the controlled environment. Given the discontinuous nature of the discharge it is possible to discharge at precise times (taking tides into consideration). Fish welfare may also be less at risk in a well boat due to the more controlled nature of the environment.

3.3 Cost considerations

3.3.1 Capital costs, e.g. site costs, transport hire/purchase costs, equipment hire/purchase costs etc.

- £3,300/day for Treatment Work Boats for Tarp treatments
- Oxygenation equipment

- £6,000/day for Wellboat treatments

3.3.2 Operating costs, e.g. labour costs, site operation costs, transport costs, equipment costs, environmental monitoring costs etc.

Labour costs per/day treating with Wellboat would be £300-£500

Labour costs per/day treating with Tarpaulin would be £1,000

4. Conclusions

4.1 Summary of available options

The only two options to discharge are either under SEPA/CAR licence or under marine licence.

4.2 Summary of pros and cons of each option

The following table summarise aspects of each scenario:

Options	Cost	Chemical usage	Technical difficulty	Logistics	Environmental impact	Treatment efficacy	Risk to livestock	Strategic acceptability
Tarpaulin– CAR consent	High to Moderate	High	Very labour intensive.	Weather and tidal restrictions apply	Moderate	Good	Very high	Low
Wellboat – Marine licence	Very High	Moderate	Less labour intensive and more efficient	Boat availability, cost and size are the only restrictions	Low	Good	Moderate to High	High

4.3 Identification of BPEO

It is clear from the report that the best environmental option is via the use of the wellboat, however generally the same amount of active ingredient is entering the environment regardless of discharge method. With sufficient training and good weather conditions full tarpaulin treatments are just as effective. Wellboats are expensive to hire and are limited in number of suitable vessels that can enter into Loch Etive. The purpose of this application is to ensure that all possible options are available as a treatment disposal method which in turn allows greater flexibility and allows all options for the fish to have an effective treatment when needed.

Standard Operating Procedure for Bath Treatments on Wellboat

1. Ship shall be cleaned and disinfected as per requirements for area and previous operations according to industrial cleaning procedure.
   Recent preparations of the pyrethroids, organophosphates and H2O2 drug doses and administration time shall be indicated on the prescription provided with medication (trace data sheet).
2. Fish must be starved long enough so the water does not become contaminated by excrement or anything that degrades water quality and may inactivate bathing funds.
3. Use the boat's maximum equipment to ensure sufficient Dissolved Oxygen during treatment (lowest level of Dissolved Oxygen during treatments is > 7mg / l)
4. Greater care and careful judgment must be used in the handling of fish at low and high temperatures.
5. When the fish to be treated are loaded into the boat, external water exchange must run at maximum for at least 10 minutes. This is to ensure the reduction of excrement or anything which degrades the water and may inactivate treatment.
6. It is paramount that only essential personnel are involved in the treatment procedure.
   There must be a clear indication of who is responsible for all tasks and procedures, this must be established prior to loading.
   Crew must be extra vigilant to ensure that all systems are functioning correctly, i.e. that all relative valves are open/closed, pumps running. Crew must remain vigilant throughout the treatments.
7. Bath treatment of fish is a large and demanding task. This applies to both the boat and cages so it is essential to double check that all involved personnel have adequate training. Correct Health & Safety Procedures are also key to success in this same operation.
8. When handling the bathing medium, it is important to avoid skin contact with drug use and suitable protective clothing such as gloves, goggles, facemask when mixing and dosing of the product.
9. Record of water quality parameters shall be submitted to the fishfarm after finishing treatments.
10. Wellboat Circulation procedure is as follows.
    - When the fish are loaded, the DO2 must first be checked to ensure that it is safe to proceed with treatments.
    - When there is consensus between the Fishfarm Person in Charge and the Wellboat Bridge that the treatment may proceed the Circulation Pumps are changed from open circulation to closed circulation (great care must be taken to assure the water level in the tank is pressed full as a lower level can cause foaming which may affect the treatment.

- Pumps valves to be changed are starboard 700m3, port 700m3, starboard 350m3 and port 350m3.
- Only when it is confirmed that the pumps are all on closed circulation will the Hull Doors be closed.
- Before medicine is dosed there must be positive reporting from the bridge. It must never be assumed that systems are ready until this occurs. The same applies to communication between the person in charge of changing circulation and the bridge. There must always be positive reporting between personnel.

11. When it is confirmed that the tank is ready for dosing the agreed time must be double checked. It is the responsibility of the fishfarm management to ensure the correct amount of dose is used. This however must be agreed and clarified previously with the Wellboat Bridge. There will be two personnel responsible for the administration, one from the fishfarm and another from the wellboat. Both must witness and agree to the measurement of dosage. This safety procedure must be vigilantly applied.
    There must also be two people responsible for the timing of the treatments. This is also logged in the ships log.
12. At any time the Wellboat operators, Fishfarm Person in Charge or any Authorised Authority have the right to abandon the treatment if there is a concern for the welfare of the fish.
13. When the time has elapsed circulation is changed from closed to open and the fish may be immediately unloaded to the pen. Careful observation of all water parameters is maintained throughout.

....

Signature Master Signature of Fishfarm Person in Charge

Date:

Safety Data Sheet

according to 1907/2006/EC, Article 31

Printing date 13.06.2015 *Version number 3* *Revision: 13.06.2015*

1 Identification of the substance/mixture and of the company/undertaking

· **Product identifier**

· **Trade name: Salmosan Vet**

· **Relevant identified uses of the substance or mixture and uses advised against**
No further relevant information available.

· **Application of the substance / the preparation**
Veterinary Medicinal Product. Powder for suspension for fish treatment containing 50% w/w azamethiphos, for the control of mature pre-adult to adult sea-lice (Lepeoptheirus salmonis and/or Caligus species) on farmed Atlantic salmon (Salmo salar).
Consumables for biochemistry anayzer

· **Manufacturer/Supplier:**
Fish Vet Group
22 Carsegate Road
Inverness
IV3 8EX
Scotland UK
Tel: +44 (0) 1463 717774
Fax: +44 (0) 1463 717775
eMail: info@fishvetgroup.com

· **Further information obtainable from:**
+44 (0) 1463 717774
eMail: info@fishvet.com

· **Emergency telephone number:**
UK : +44 (0) 845 0093342
International: +44 (0) 1233 849729 (24/7)

2 Hazards identification

· **Classification of the substance or mixture**
· **Classification according to Regulation (EC) No 1272/2008**

GHS09 environment

Aquatic Chronic 1 H410 Very toxic to aquatic life with long lasting effects.

GHS07

Skin Sens. 1 H317 May cause an allergic skin reaction.

· **Classification according to Directive 67/548/EEC or Directive 1999/45/EC**

Xi; Sensitising

R43: May cause sensitisation by skin contact.

N; Dangerous for the environment

R50/53: Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.

· **Information concerning particular hazards for human and environment:**
The product has to be labelled due to the calculation procedure of the "General Classification guideline for preparations of the EU" in the latest valid version.

· **Classification system:**
The classification is according to the latest editions of the EU-lists, and extended by company and literature data.

· **Label elements**
· **Labelling according to Regulation (EC) No 1272/2008**
The product is classified and labelled according to the CLP regulation.

(Contd. on page 2)

Safety Data Sheet
according to 1907/2006/EC, Article 31

Printing date 13.06.2015 *Version number 3* *Revision: 13.06.2015*

***Trade name:* Salmosan Vet**

(Contd. from page 1)

· ***Hazard pictograms***

GHS07 GHS09

· ***Signal word*** *Warning*

· ***Hazard-determining components of labelling:***
Azamethiphos
· ***Hazard statements***
H317 May cause an allergic skin reaction.
H410 Very toxic to aquatic life with long lasting effects.
· ***Precautionary statements***
P261 Avoid breathing dust/fume/gas/mist/vapours/spray.
P280 Wear protective gloves/protective clothing/eye protection/face protection.
P273 Avoid release to the environment.
P321 Specific treatment (see on this label).
P363 Wash contaminated clothing before reuse.
P501 Dispose of contents/container in accordance with local/regional/national/international regulations.
· ***Other hazards***
· ***Results of PBT and vPvB assessment***
· ***PBT:*** *Not applicable.*
· ***vPvB:*** *Not applicable.*

13 Disposal considerations

· ***Waste treatment methods***
· ***Recommendation***
Must not be disposed of together with household garbage. Do not allow product to reach sewage system.

· ***European waste catalogue***	
18 02 03	*wastes whose collection and disposal is not subject to special requirements in order to prevent infection*
*18 02 05**	*chemicals consisting of or containing dangerous substances*

· ***Uncleaned packaging:***
· ***Recommendation:*** *Dispose of in accordance with national regulations.*

· ***Environmental hazards:***	*Product contains environmentally hazardous substances: Azamethiphos*
· ***Marine pollutant:***	*Yes*
	Symbol (fish and tree)
· ***Special marking (ADR):***	*Symbol (fish and tree)*
· ***Special marking (IATA):***	*Symbol (fish and tree)*

16 Other information

This information is based on our present knowledge. However, this shall not constitute a guarantee for any specific product features and shall not establish a legally valid contractual relationship.

· ***Relevant phrases***
H302 Harmful if swallowed.
H317 May cause an allergic skin reaction.
H400 Very toxic to aquatic life.
H410 Very toxic to aquatic life with long lasting effects.

R22 Harmful if swallowed.
R36 Irritating to eyes.
R43 May cause sensitisation by skin contact.
R50/53 Very toxic to aquatic organisms, may cause long-term adverse effects in the aquatic environment.

Appendix: FOI correspondence (in chronological order)

From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 27 March 2018 09:37
To: 'FOI'
Subject: FOI re. well boat chemicals and 'Clean Treat' system since 1 Jan 2017

Please provide information on the use of chemicals via well boats including the 'Clean Treat' system since 1 January 2017.

Please include data on the use of Azamethiphos, Deltamethrin, Hydrogen Peroxide and any other chemicals used via well boats.

Please include correspondence with salmon farming and chemical companies (including Benchmark - the manufacturer of 'Clean Treat'), Government agencies such as SEPA and Marine Scotland and internal SNH correspondence.

Please include discussions regarding the 'Clean Treat' system in particular and the treatment, capture and disposal of chemicals used via well boats.

As context, Fish Update reported (23 March 2018):

Eco friendly cleaner a ‘game changer’

by Jenny Hjul

THE Clean Treat system, developed by Benchmark to improve the environmental footprint of sea lice treatments, has been hailed by senior fish vets as a possible ‘game changer’.

John Marshall of Benchmark told the Fish Veterinary Society’s annual conference, held near Edinburgh this week, that the technology was the result of 10 years’ work and had now been deployed aboard two vessels, both operating in Norway.

The system removes all trace of chemicals from bath treatment water, and can be installed on well boats or on purpose built or specially adapted barges.

Launched last year, Clean Treat is a three-step process: the treatment water containing medicines goes through a pre-filter to remove organic matter and detritus. It then passes through primary, secondary and tertiary purification stages, with the medicine level checked at each step.

Then, in an onboard lab, a chemist samples and releases the water when there is no detectable level of medicines present.

The chemical residues removed from treatment water are solidified and then disposed of in one of the world’s three specialised incinerators designed for such waste.

The second vessel fitted with Clean Treat left for Norway on Tuesday, said Marshall, and is due to go into action at the end of March.

Stationed in a fjord, it can purify 1,200 m3 an hour, increasing the capacity of the previous Clean Treat boat, and will have a rota of chemists working in its detection lab as it undergoes tests.

Benchmark is still collaborating with industry partners to further optimise the system, and the commercial scale field trials in Norway will test new products.

Clean Treat is suitable for most currently available bath treatments for sea lice, and it has the potential to work on compounds not previously used in aquaculture.

Asked whether farmers’ practice of reducing sea lice medicines, because of their possible effect on the environment, would now be reviewed in light of Clean Treat’s cleansing abilities, Marshall said: ‘It does open the door to medicines we haven’t even considered before…this is making a real impact on the industry.’

As well as engaging in conversations over changing the types of medicines farmers could use, Benchmark has also been in talks with the Aquaculture Stewardship Council.

At least two new products could be brought to the market as a result of Clean Treat, said Marshall, who added that its benefits could also apply to AGD treatments.

Ronnie Soutar, president of the FVS and recently appointed head of veterinary services at Scottish Sea Farms, said the technology ‘seems to be a game changer’.

Marshall said the vessel en route to Norway is an adapted oil sector boat, fitted out to accommodate the Clean Treat systems, and with plenty of accommodation to house the teams of scientists involved in the trials.

Clean Treat would ideally be delivered as a service rather than sold to individual farmers, he said.

https://www.fishupdate.com/eco-friendly-cleaner-game-changer/

According to Benchmark's web-site:

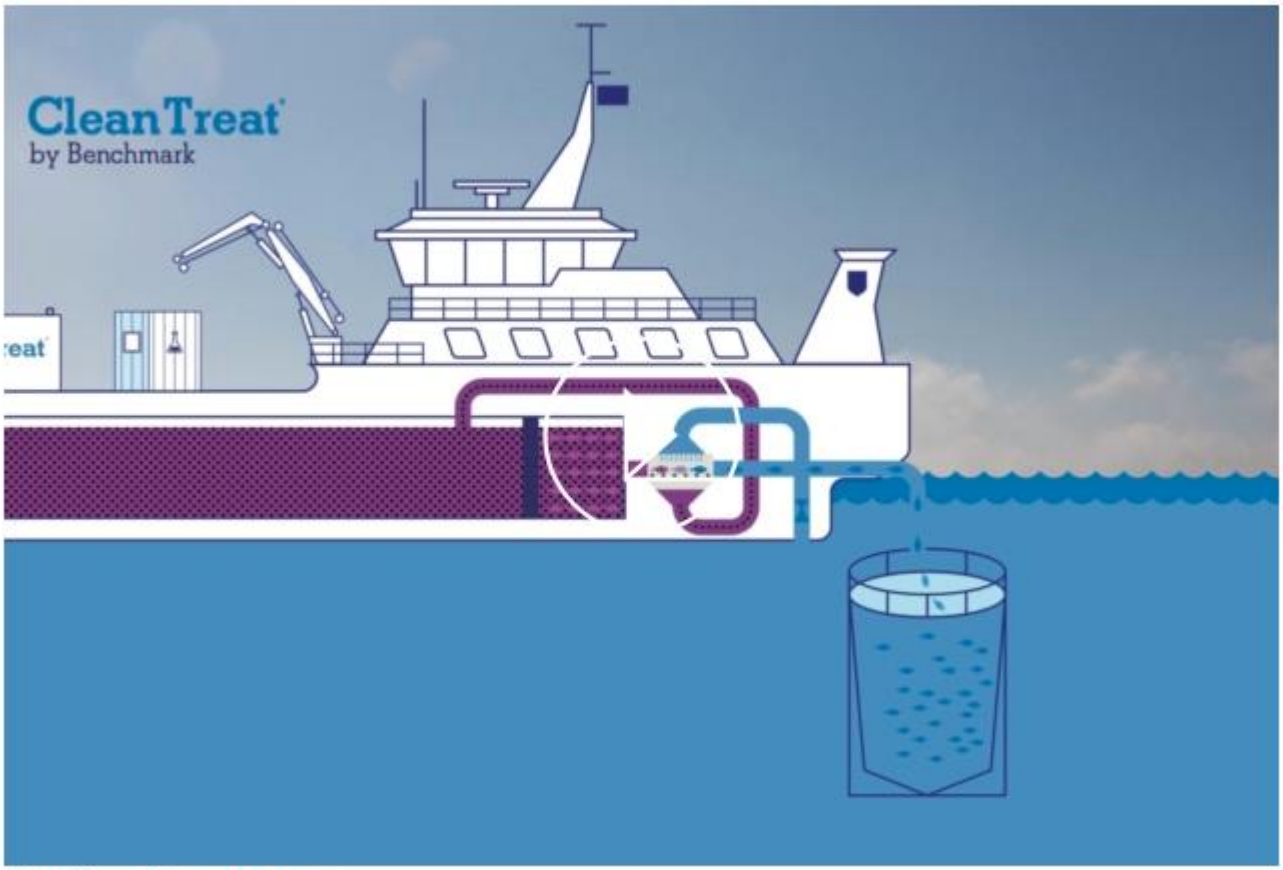
What is CleanTreat?

It is a purification system that cleanses the treatment water after delousing in well boats, ensuring the water is cleaned of all medicated particles before it is released into the environment. It also prevents treated lice from going back into the environment so that they do not spread resistance.

CleanTreat can be used on well boats, tankers, platforms and landbases and is effective against most available bath treatments for sea lice.

Chemical based bath treatments that are released into the environment - particularly the fjords in Norway - is one of the biggest objections to the salmon farming industry. CleanTreat solves this environmental challenge.

Click the video below to watch the process.



The CleanTreat process

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Director, Global Alliance Against Industrial Aquaculture (GAAIA): http://www.salmonfarmingkills.com

Read my blog via http://donstaniford.typepad.com/my-blog

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From: Peter.Millar@gov.scot [mailto:Peter.Millar@gov.scot]
Sent: 25 April 2018 15:41
To: salmonfarmingkills@gmail.com
Subject: FoI/18/00985 - Response to Information Request

Dear Don Staniford,

Following your request for information, submitted on 27 March 2018, please find the attached letter of response and information.

003#2.pdf 002.xls 001#2.pdf FoI_18_00985 - Letter of response - 2

Regards,

Peter

Peter Millar
Business Officer

Marine Scotland - Marine Planning & Policy

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

Direct Line: +44 (0)131 244 3912

General Queries: +44 (0)300 244 5046
Email: peter.millar@gov.scot
Website: http://www.gov.scot/Topics/marine/Licensing/marine

From: FOI [mailto:FOI@snh.gov.uk]
Sent: 25 April 2018 17:50
To: Don Staniford
Subject: RE: FOI re. well boat chemicals and 'Clean Treat' system since 1 Jan 2017

Dear Mr Staniford,

Thank you for your information request. I've attached our response.

Please don't hesitate to contact us if you have any questions about our response or any problems with the attached documents.

Information Request - Mr Staniford - Collat

Information Request - Mr Staniford - SNH F

Yours sincerely,

Rhoda Davidson

Information Officer

From: FOI Helpdesk [mailto:FOI.Mail@sepa.org.uk]
Sent: 27 April 2018 15:33
To: Salmonfarmingkills@gmail.com
Subject: SEPA Response - [F:0188668]

Dear Mr Staniford

REQUEST FOR INFORMATION

Please refer to the enclosed response in relation to your request for information. We apologise for the slight delay in providing this response.


Release.zip


F0188668 EIR Response.pdf

Regards

Alison Ewing

SEPA Access to Information team

Email: foi@sepa.org.uk

Tel: 01786 457700

From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 30 April 2018 12:43
To: Access to Information Enquiries <FOI.Mail@sepa.org.uk>
Subject: RE: SEPA Response - [F:0188668]

Another clarification request:

Is the 2017 well-boat data on chemical use included in the data published via Scotland's Aquaculture:
http://aquaculture.scotland.gov.uk/data/fish_farms_monthly_biomass_and_treatment_reports.aspx ?

If not, is it available as an Excel spreadsheet?

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Director, Global Alliance Against Industrial Aquaculture (GAAIA):
http://www.salmonfarmingkills.com

Read my blog via http://donstaniford.typepad.com/my-blog

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From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 30 April 2018 12:50
To: 'Peter.Millar@gov.scot'
Subject: RE: FoI/18/00985 - Response to Information Request

Peter,

Could you please double-check that the information disclosed is complete?

Information received from SEPA (see next email) suggests that Marine Scotland has failed to disclose a significant amount of information. For example:

To Marine Scotland

Email msmarinelicensing@gov.scot

Date: 26th August 2017

From: Charlotte Maddocks
charlotte.maddocks@marineharvest.com
Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
Caolas a Deas East, Loch Shell CAR/l/1120220;	Salmosan Vet	Azamethiphos	400g per 24 hours	~700T	26.08.17	~29.08.17

To Marine Scotland

Email MS.MarineLicensing@gov.scot'

Date: 22nd August 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
Noster CAR/L/1009974/VN10 & MPSv5; Seaforth CAR/L/1009963/VN12 & MPSv4; Trillichean Mor CAR/L/1003016	Salmosan	Aamethipho s	170g; 190g and 190g respectively	200T	24/08/2017	~26/08/17

Treatment boat - Inter Caladonia well boat

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

From: Ray Waddell

ray.waddell@marineharvest.com

Email ms.marinelicensing@gov.scot

Marine Harvest (Scotland) Ltd.
Farms Office, Blar Mhor Industrial Estate
Fort William, PH33 7TP
Telephone 01397 701 550
Mobile
Fax 01397 701 174

Date: 25th January 2017

We intend to discharge the following used chemical from the wellboat Inter Caledonia in compliance with licence conditions. Actual times of discharge are subject to weather and workload.

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Date	
				Start	End
Loch Hourn 06008/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	1760.00	0900hrs 27/01/2017	31/01/2017

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

Email ms.marinelicensing@gov.scot

From: Ray Waddell

ray.waddell@marineharvest.com

Marine Harvest (Scotland) Ltd.
Farms Office, Blar Mhor Industrial Estate
Fort William, PH33 7TP
Telephone 01397 701 550
Mobile
Fax 01397 701 174

Date: 3rd February 2017

We intend to discharge the following used chemical from the wellboat Inter Caledonia in compliance with licence conditions. Actual times of discharge are subject to weather and workload.

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Date	
				Start	End
Cairidh 05996/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	220g	0900hrs 04/02/2017	07/02/2017
Maol Ban 06021/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	2530g	0900hrs 04/01/2017	26/02/2017
Sconser 06018/16/0	Salmosan Vet (Fish Vet Group)	Azimethiphos	1210g	1400hrs 04/02/2017	26/02/2017

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: EPIwesthighands-argyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 06th January 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (T)	Start	End
Shuna	CAR/L/1109 280	Salmosan	Azamethiphos	2240g	229T	9th January	20th January

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: WestHighlandArgyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 19th April 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) g of active ingredient	Biomass (T)	Start	End
Maclean's Nose	CAR/L/100 2965	Salmosan 880g	Azamethiphos	440g	30T	21st April 2017	22nd April 2017

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: EPIwesthighands-argyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 06th January 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (T)	Start	End
PNG	CAR/L/1000 800	Salmosan	Azamethiphos	4160g	338T	9th January	20th January

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Tel:
Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: EPIwesthighands-argyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 06th January 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (T)	Start	End
BDNC	CAR/L/1004 226	Salmosan	Azamethiphos	2660g	547T	9th January	20th January

To Marine Scotland

Email msmarinelicensing@gov.scot

Date: 19th June 2017

From: Charlotte Maddocks

charlotte.maddocks@marineharvest.com

Marine Harvest (Scotland) Ltd.
Stob Ban House,
Glen Nevis Business Park
Fort William, PH33 6RX
Telephone 01397 701 550
Mobile
Fax 01397 701 174

We intend to discharge the following in accordance with consent conditions

Site	Theraputant	Active Ingredient	Quantity (up to) grams	Biomass	Date	
					Start	End
North Shore West CAR/L/1004085; North Shore East CAR/L/1129789; Tabhigh CAR/L/1129793/VN01	Salmosan Vet	Azamethiphos	220g;220g; 240g repectively	2500T	21/06/2017	

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

Email: WestHighlandArgyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

From: Sabina Wilinska

Date: 26th May 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) Grams	Biomass (T)	Start	End
Camus Glas	CAR/L/1009965	Salmosan 1760g	Azamethiphos	880g	104T	28th May	31st May

Marine Harvest Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Email: sabina.wilinska@marineharvest.com

To: Stephen MacIntyre
Marianne MacPherson
SEPA Fort William

From: Sabina Wilinska

Email: WestHighlandArgyll@sepa.org.uk
RegistryDingwall@sepa.org.uk

Date: 25th April 2017

We intend to discharge the following in compliance with consent conditions:

Site Name	Site	Therapeutant	Active Ingredient	Quantity (up to) g of active ingredient	Biomass (T)	Start	End
Linnhe	CAR/L/1009 970	Salmosan 200g	Azamethiphos	100g	99T	27th April	27th April

I therefore look forward to receiving ALL the information requested.

Thanks.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Director, Global Alliance Against Industrial Aquaculture (GAAIA):
http://www.salmonfarmingkills.com

Read my blog via http://donstaniford.typepad.com/my-blog

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From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 01 May 2018 07:56
To: 'ceu@scotland.gsi.gov.uk'
Cc: 'Peter.Millar@gov.scot'
Subject: FOI re. well boat licences to permit dishcarges of chemotherapeutants

Further to FoI/18/00985, please provide information on well boat licences issued by MS-LOT to fish farm operators to permit the discharge of chemotherapeutants.

Please provide copies of all well boat licences and copies of well boat licence returns detailing chemical use.

As context, the Director of Marine Scotland's letter to the Rural Economy & Connectivity Committee dated 17 April 2018 included:

'Wellboat licences'

Wellboat licences are issued by MS-LOT to fish farm operators to permit the discharge of chemotherapeutants following treatment for sealice in a vessel (a wellboat). Such licences are only issued where a valid Controlled Activity Regulations (CAR) licence has been issued to the relevant fish farm site for discharge of chemotherapeutants following in-cage treatments by SEPA following its consideration of the environmental effects. The volumes permitted for discharge are the same as the CAR volumes and Marine and CAR licences are conditioned to prohibit the release of chemotherapeutant under one regime at the same time as the other, thereby avoiding cumulative effects.

Wellboat licences are issued for three (3) years.

MCA and NLB have confirmed they will not provide routine comment on the applications for 'wellboat licences' as there is not a navigational element.

SEPA has provided standing advice that it has no objection to 'wellboat applications' provided the type and amount of chemical used and discharged will not exceed that specified in the respective CAR licence. An agreed condition is added to licences which prevents the simultaneous discharge from bath treatments.

SNH is consulted where such activity takes place in a European site, and advise of the likely significant effects. SNH directs MS-LOT to advice given by SNH during the CAR licensing process. MS-LOT would look to adopt the 'appropriate assessment' carried out by the SEPA as the competent authority under The Conservation (Natural Habitats, &c.) Regulations 1994. Again, a similar process occurs where SNH advise that an activity may affect the feature of a Marine Protected Area (MPA).

Online via http://www.parliament.scot/S5_Rural/20180502_REC_Committee_-_Public_Papers.pdf

Finally, please clarify whether the use of chemical via well boats is included in the data published via the Scotland's Aquaculture database:

http://aquaculture.scotland.gov.uk/data/fish_farms_monthly_biomass_and_treatment_reports.aspx

i.e. Is well boat chemical use included or not via Scotland's Aquaculture database?

If so, when was well boat chemical use data included?

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Director, Global Alliance Against Industrial Aquaculture (GAAIA): http://www.salmonfarmingkills.com

Read my blog via http://donstaniford.typepad.com/my-blog

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From: Access to Information Enquiries [mailto:FOI.Mail@sepa.org.uk]
Sent: 01 May 2018 11:05
To: 'Don Staniford'; Access to Information Enquiries
Subject: RE: SEPA Response - [F:0188668]

Dear Mr Staniford

As explained in the response letter SEPA only holds information in relation to well-boat data where Marine Scotland have shared this information with SEPA.

I understand that the comprehensive data relating to well-boat treatments are held by Marine Scotland; I suggest you contact Marine Scotland directly. Please contact the SG Central

Enquiry Unit ceu@gov.scot

Kind Regards

Cara Everitt

From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 01 May 2018 11:09
To: 'Access to Information Enquiries'
Subject: RE: SEPA Response - [F:0188668]

Thanks - but that does not answer my question.

Please reconsider your reply and answer:

Is the 2017 well-boat data on chemical use included in the data published via Scotland's Aquaculture:

http://aquaculture.scotland.gov.uk/data/fish_farms_monthly_biomass_and_treatment_reports.aspx ?

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Director, Global Alliance Against Industrial Aquaculture (GAAIA): http://www.salmonfarmingkills.com

Read my blog via http://donstaniford.typepad.com/my-blog

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From: Access to Information Enquiries [mailto:FOI.Mail@sepa.org.uk]
Sent: 01 May 2018 11:25
To: 'Don Staniford'; Access to Information Enquiries
Subject: RE: SEPA Response - [F:0188668]

Apologies

I have asked colleagues who confirm that it is not included on Scotland's Aquaculture page.

However It is included in the SPRI figures that are published on SEPA's website.

Kind Regards

Cara Everitt

From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 01 May 2018 13:02
To: 'AccesstoInformation'
Subject: FOI re. well-boat chemical use data reported via Scotland's Aquaculture database and SPRI

Please provide information on the reporting (or not as the case appears to be) of chemical use in well-boats via Scotland's Aquaculture database and the SPRI.

Please provide copies of any correspondence with Marine Scotland, SNH, the Scottish Government, SSPO, chemical companies, well boat companies and any other parties in relation to the reporting of chemical use in well-boats.

As context please see emails below which includes earlier today from Cara Everitt:

"I have asked colleagues who confirm that it is not included on Scotland's Aquaculture page. However It is included in the SPRI figures that are published on SEPA's website."

I also note via a search of the SPRI that data on Azamethiphos use for 2016 is still not available for many sites:

Pollutant Search Results

Pollutant	Azamethiphos
Media	Water
Units	Kg
Reporting Threshold	0.001 (2016)
Industry Sector	All

Year of Return	Registered Company Name (Site Name)	Site Address	Total Release	Return Availability	Site Graph
2016	The Scottish Salmon Company Ltd Gob a'Bharra North MCFF, Loch Fyne	Loch Fyne, West of Drum Point, Drum, Portavadie, Argyll PA21 2ER	8.20	Agreed	
2016	The Scottish Salmon Company Ltd Kyles Vuia East MCFF, West Loch Roag	Kyles Vuia, West Loch Roag, South of Euniagh Mor, Great Bernera, Isle of Lewis, Western Isles HS2 9ND	N/A	Agreed	
2016	Scottish Sea Farms Ltd Fishnish East MCFF, Sound of Mull (Site B)	Port an t-Sluic, Sound of Mull, East of Fishnish Point, Fishnish, Isle of Mull, Argyll PA65 6BA	1.60	Agreed	
2016	Scottish Sea Farms Ltd Fishnish West MCFF, Sound of Mull (Site A)	Fishnish Bay, Sound of Mull, East of Rubha na Leitreach, Fishnish, Isle of Mull, Argyll PA65 6BA	N/A	Agreed	
2016	Grieg Seafood Shetland Limited East Head of Papa MCFF, East Voe	East Voe, The Deeps, South Ayre, East Head of Papa, Papa, by Scalloway, Shetland ZE1 0XN	N/A	Agreed	
2016	Grieg Seafood Shetland Limited East of Langa MCFF, Bur Wick	Bur Wick, East of Langa, Scalloway, Shetland ZE1 0XN	N/A	Agreed	
2016	Marine Harvest (Scotland) Ltd Balmeanach Bay MCFF, Sound of Raasay	Balmeanach Bay, Sound of Raasay, East of Balmeanach, Sconser, Isle of Skye IV51 9NH	N/A	Agreed	

And for 2017 there is zero data:

Pollutant Search Results

Pollutant	Azamethiphos
Media	Water
Units	Kg
Reporting Threshold	0.001 (2017)
Industry Sector	All

Year of Return	Registered Company Name (Site Name)	Site Address	Total Release	Return Availability	Site Graph
2017	Cooke Aquaculture Scotland Limited Bastaness MCFF, Mid Yell, Shetland	MID YELL, SHETLAND ZE2 9BN	-	Not Yet Agreed	
2017	Marine Harvest (Scotland) Limited Raineach, East Loch Tarbert, Isle of Harris	RAINEACH, EAST LOCH TARBERT, SCALPAY, ISLE OF HARRIS HS4 3YD	N/A	Not Yet Agreed	
2017	Marine Harvest (Scotland) Limited Port na Moine North, Loch Craignish, Argyll	PORT NA MOINE NORTH, LOCH CRAIGNISH, ARGYLL	-	Not Yet Agreed	
2017	Dawnfresh Farming Ltd Port na Mine MCFF (Etive 3), Loch Etive	Loch Etive, Port na Mine, Taynuilt, Argyll PA35 1HU	-	Not Yet Agreed	
2017	Wester Ross Fisheries Limited Isle Martin MCFF, Loch Kanaird	Loch Kanaird, East of Isle Martin , Ardmair, by Ullapool, Highland IV26 2TN	N/A	Not Yet Agreed	
2017	Grieg Seafood Shetland Limited North Havra MCFF, Sound of Havra	Sound of Havra, Haddock Sands, North Havra, East of Binna Ness, Scalloway, Shetland ZE2 9GJ	-	Not Yet Agreed	
2017	Grieg Seafood Shetland Limited Taing of Railsborough MCFF, Cat Firth	Cat Firth, Taing of Railsborough, Girlsta, South Nesting, Shetland ZE2 9SQ	-	Not Yet Agreed	

When will data for 2016 and 2017 be available?

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Director, Global Alliance Against Industrial Aquaculture (GAAIA): http://www.salmonfarmingkills.com

Read my blog via http://donstaniford.typepad.com/my-blog

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From: FOI Helpdesk [mailto:FOI.Mail@sepa.org.uk]
Sent: 29 May 2018 16:27
To: Salmonfarmingkills@gmail.com
Subject: SEPA Response - [F:0188830]

Dear Mr Staniford

REQUEST FOR INFORMATION

Please refer to the enclosed response in relation to your request for information.

Release.zip

F0188830 EIR Response.pdf

Regards

Julie OBrien

SEPA Access to Information team

Email: foi@sepa.org.uk

Tel: 01786 457700

From: Howell S (Sebastian)
Sent: 01 June 2018 15:56
To: 'salmonfarmingkills@gmail.com'
Subject: Response to FOI Review - FoI/18/00985

Dear Mr Staniford,

Please see attached the response to your recent request to the Scottish Government for a review of FOI case FoI/18/00985. This response includes two additional documents.

<< File: FoI1800985 review response.pdf >>

<< File: FOI - 18_00985 - Part 1.pdf >> << File: FOI - 18_00985 - Part 2.pdf >>


FOI - 18_00985 - Part 1.pdf


FoI1800985 review response.pdf


FOI - 18_00985 - Part 2.pdf

Yours sincerely,

Sebastian Howell

From: Daniel.Pendrey@gov.scot [mailto:Daniel.Pendrey@gov.scot]
Sent: 28 June 2018 18:03
To: salmonfarmingkills@gmail.com
Subject: RE: FoI/18/01265 - Response to Information Request

Dear Don Staniford,

Thank you for your request dated 1st May 2018 under the Environmental Information (Scotland) Regulations 2004 (EIRs). Please find your response letter attached.

FoI_18_01265 - Letter of Response.d

With regard to the requested information, the following link will give you access to view and download the files: https://www.dropbox.com/sh/a96fujp5m3kggkm/AADwOgnak7P9a88i-USwM87Ia?dl=0

The link goes to the Scottish Government Dropbox area, a secure place to share large and/or numerous files. Due to the high volume of information and as part of the continuous improvement of our service, we are providing you with the information in one place and at one time (as opposed to many emails). Please download the information from Dropbox.

To access the documents via Dropbox use the above link taking the following steps:

1. Click the Download button at the top right, then Direct download to save all the documents to your PC, if you wish.
2. Alternatively, click a document to view it in your browser and then click the Download button at the top right to save that document to your PC.
3. If you have a Dropbox account you can save the files to your Dropbox.
4. There is a toolbar at the bottom of the screen with options to show a sidebar, Zoom, Page up/down, use Fullscreen or Print.

Regards,

Danny

Daniel J Pendrey

Business and Operational Delivery Section Leader - Marine Scotland Licensing Operations Team

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

Direct Line – 0131 244 4434 Switchboard – 0131 244 2500

Email: daniel.pendrey@gov.scot
Web: http://www.gov.scot/Topics/marine/Licensing/marine

From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 25 September 2018 17:01
To: 'ceu@scotland.gsi.gov.uk'
Subject: FOI re. chemical treatments in tarpaulins & well boats since 1 January 2013

Please provide an annual breakdown on the use of chemicals on salmon farms via a) tarpaulins; b) well boats since 1 January 2013.

Please include the use of hydrogen peroxide, azamethiphos, cypermethrin, deltamethrin and any other chemical treatments via tarpaulins and well boats.

Please give data for 2013, 2014, 2015, 2016, 2017 and thus far during 2018.

Please also provide any information detailing any breakdown of chemical usage via tarpaulin or well boat in any documents, materials, data, presentations or correspondence.

For example, via the Scotland's Aquaculture database it seems unclear whether reported use of Azamethiphos at Colonsay in June 2018 is via well boat or tarpaulin:

Fish Farm Monthly Biomass and Treatments Details

Year	2018
Month	June
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1110925/V5
Licence active at time of report	CAR/L/1110925
Report for Site	COLS1 Colonsay
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	1683
Biomass Exceedance (tonnes)	0
Feed (kg)	278736
Mortalities (kg)	3962.5284942937

Sealice Treatments Used

Sealice Treatment Product	Quantity Used (grams)
Azamethiphos	3189.9999839068
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0

Data supplied by SEPA on 31/08/2018

Location Details

Receiving Water	East of Colonsay
National Grid Reference	NR43459672
View on Map	View on Map

Data supplied by SEPA on 31/08/2018

However, a SEPA FOI reply dated 29 May 2018 (via F:0188830) included:

Response

[1] Wellboat chemical use is not reported on Scotland's Aquaculture Website.
Under the terms of Regulation 9 of the EIRs, SEPA has a duty to provide advice and assist. We advise that SEPA does not directly regulate wellboats. It is the requirement of the operator's marine licenses to supply all well boats treatment notifications to Marine Scotland. SEPA is provided information relating to some well boat treatments when when copies of the notifications are provided to SEPA by Marine

Scotland. In accordance with Regulation 14(1)(b) of the EIRs we advise that you may wish to contact Marine Scotland to enquire further on the reporting of well-boat chemical use data. The general enquiries email address for the Scottish Government is ceu@gov.scot

[2] Please refer to the attached 2016 and 2017 correspondence

Please note that personal information has been redacted from the documents in accordance with Regulation 11(2) of the EIRs and Data Protection Principles. We have considered public interest in respect of the withholding of this personal data and have determined that the public interest in withholding this specific information outweighs the public interest in its release in to the public domain. Please note that we have not withheld complete documents which contain such personal data and have released all other information within the document which is not subject to requirements of the Data Protection Act 2018.

[3] Please note that the azamethiphos release to water was reported on the SEPA SPRI website in 2016. You can search and download and view the data on our public website here http://apps.sepa.org.uk/spripa/Search/ByPollutant/Results.aspx?Media=water-d&Pollutant=169&Year=2016&IncludeBrt=Y

[4] We confirm that Wellboat azamethiphos use will be added to SPRI. Please note that but SEPA has yet to receive the 2017 wellboat use figures from Marine Scotland. SEPA does not hold this information therefore 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. The public interest in making the requested information available is outweighed by that in maintaining the exception in regulation 10(4)(a) of the EIRs.

We advise the information will be available on SEPA's website in the Autumn 2018 (normally published in October).

As context, Fish Farming Expert reported (25 September 2018):

Norway proposes ban on tarpaulin bath treatments

Fisheries minister Harald Nesvik is proposing to ban the release of lice treatment medicines at many fish farms. Photo: NFD

Norwegian fisheries minister Harald Nesvik is proposing to ban the release of delousing agents at fish farms, effectively outlawing the use of tarpaulin bath treatments.

By Editors

The move follows surprising and controversial early findings in one scientific study that hydrogen peroxide, regarded as the least environmentally harmful of the chemicals used to kill sea lice, can damage shrimp stocks.

“It is important that we have a precautionary approach. We see that there are several challenges associated with the use of hydrogen peroxide and lice treatment. Until we have more knowledge in place, we propose that it is forbidden to release delousing agents at fish farms,” said Nesvik in a press release from the Ministry of Food and Fisheries (NFD).

Use only in a wellboat

The NFD will shortly submit a proposal for interim measures that will mean that medicines for bath treatments for lice can only be carried out in a wellboat, not in a tarpaulin.

The temporary prohibition will apply to treatment in and in connection with farms located in shrimp or spawning grounds, or fewer than 500 metres from such areas. The water used for lice treatment must be transported away from the farm site.

Nesvik met the aquaculture industry last week. The theme of the meeting was the use of wellboats and treatments in the pens at farms.

Sustainable growth

“The government wishes to facilitate sustainable growth in the aquaculture industry. There will always be a certain need to use drugs in farming, but we should not have a use that gives unacceptable effects on the environment,” said Nesvik, whose previous job was as media spokesman for wellboat operator, Sølvtrans.

Hydrogen peroxide is regarded as the greenest lice treatment because it is quickly diluted in the sea after use in fish farms and can break down into water and oxygen within a very short time, depending on conditions.

But an on-going study by Renée Bechmann and colleagues at the International Research Institute of Stavanger (IRIS) showed that half of the deep-water shrimp *Pandalus borealis* that were exposed to a low concentration of hydrogen peroxide for two hours died within three days.

The scientists, who used a concentration of the chemical 100 times smaller than that used in de-lousing operations, have called for the use of chemical to be stopped following the results which they say surprised them.

Guldborg Søvik: Not easy to transfer lab results to the field.

Unpublished research

Guldborg Søvik, a shrimp expert with Norway's Institute of Marine Research (IMR), said the results were worrying but pointed out that it was not always easy to transfer results from the laboratory to real-life situations, where there are variables such as current and dispersion to be taken into account.

IRIS has also been criticised for demanding a halt to the use of hydrogen peroxide on the basis on unpublished research.

A critic of the study, Chemco biologist Jan Rune Nordhagen, has also pointed out that Bechmann has long argued that salmon farming should take place in closed plants, even before she saw the results of her own research, and asked: "Can the conclusions be influenced by her attitude towards farming?"

A 2016 risk assessment by the IMR of the use of hydrogen peroxide pointed out that since vertical transport of water to deeper levels of fjords is rare, there was little risk to deep-water shrimp, although Norwegian shrimp fishermen have blamed the use of de-lousing chemicals for falling catches.

https://www.fishfarmingexpert.com/article/norway-proposes-ban-on-tarpaulin-bath-treatments/

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Read my blog via http://donstaniford.typepad.com/my-blog

Please donate via https://scottishsalmonwatch.org/donate

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From: FOI Helpdesk [mailto:FOI.Mail@sepa.org.uk]
Sent: 03 October 2018 16:22
To: Salmonfarmingkills@gmail.com
Subject: SEPA Response - [F:0189594]

SEPA
Scottish Environment Protection Agency
Buidheann Dìon Àrainneachd na h-Alba

Dear Mr Staniford

REQUEST FOR INFORMATION

Please refer to the enclosed response in relation to your request for information.

SEPA General Data Reuse Statement v3.

F0189594 EIR Response.pdf

Regards

Julie OBrien

SEPA Access to Information team

Email: foi@sepa.org.uk

Tel: 01786 457700

From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 13 October 2018 08:41
To: 'AccesstoInformation'
Subject: FOI re. Independent Consenting Review recommendation on wellboat discharge licenses & Wellboats Working Group

Please provide information on the Independent Consenting Review recommendation on wellboat discharge licenses and the Wellboats Working Group.

As context, in January 2018 the Farmed Fish Health Framework Working Group noted:

Farmed Fish Health Framework Working Group (FFHFWG)
Meeting 2
30 January 2018
Note and Actions

- It was noted the independent consenting review (ICR) recommendation on wellboat discharge licenses was outstanding.
- SG confirmed that an update would be provided at the next aquaculture industry leadership group and would be relayed to the farmed fish health working group at the next meeting.

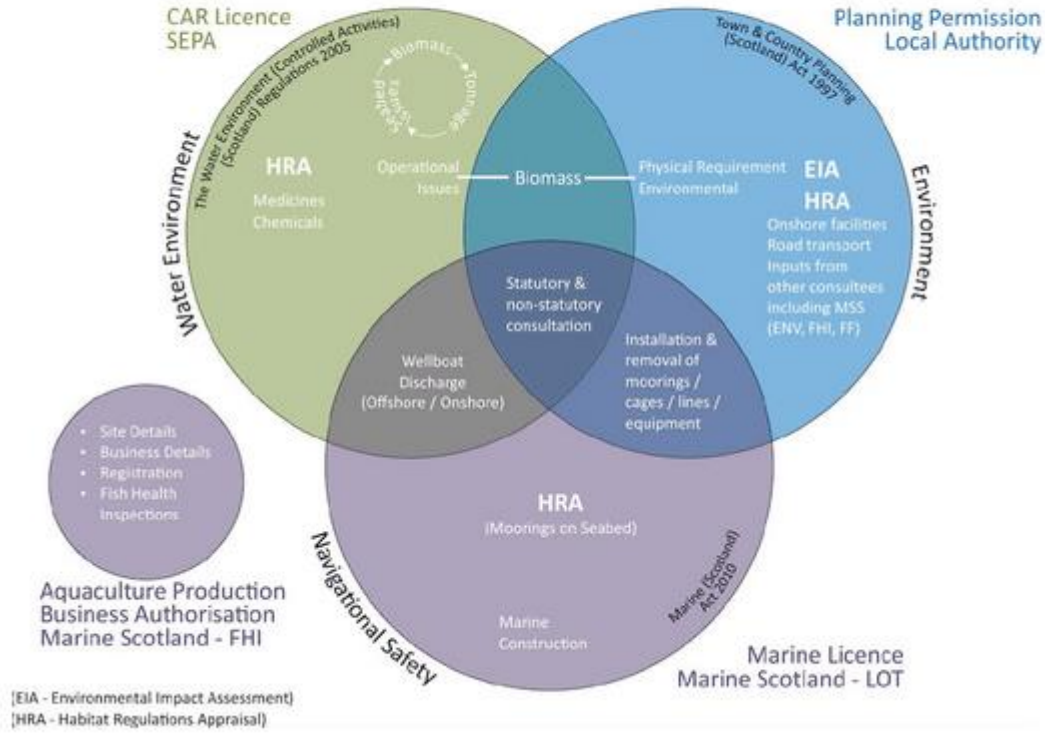
Action: SG to keep FFHWG updated with ICR wellboat discharge licence recommendation.

Marine Scotland
Secretariat
February 2018

[Note that Minutes of meetings after May 2018 are not available].

An 'Independent Review of Scottish Aquaculture Consenting' published by the Scottish Government in July 2016 identified "wellboat discharge" as overlapping in the consenting area for SEPA and Marine Scotland:

Figure 4.11: Venn diagram illustrating overlap in consenting areas for key regulators



The report included (p13):

A Ministerial Group on Aquaculture (MGA) was established in 2009 to oversee implementation of A Fresh Start, through six working groups. The MGA has since been replaced by the Ministerial Group for Sustainable Aquaculture (MGSA), which was established in 2013 to continue the work of the MGA and to support Scotland's aquaculture industry to achieve the 2020 growth targets. This includes the following working groups:

- Wellboats Working Group: considers standards for wellboats - tracking position, valve status & sea lice filtration.

And (p30):

4.2.4 Marine Licence

With respect to finfish and shellfish aquaculture, three types of activities require a marine licence(s):

- Equipment – including mussel lines, fish farm cages, walkways/pontoon;
- Moorings (i.e. deposits on the seabed); and
- Discharge of sea lice treatments from wellboats.

In relation to equipment and moorings, the marine licence focuses only on potential hazards to navigation and conditions may require appropriate markers and lighting. A separate marine licence for 'discharge of treatment agents' is also required for discharging from a wellboat. This is not focused on navigational safety and is not specifically needed to gain consent for a fish farm, but will be applied for during the operational phase, if required.

And (p53):

Table 6.1: Recommended quick wins

No.	Action	Responsibility
QW4	**Integrate wellboat Marine Licence into the CAR Licence** • It is understood that this would require one additional sentence to be added to the CAR Licence. • It is assumed that this would cover all wellboat discharges. • It is noted that SEPA and the finfish industry support this consolidation of licences.	SEPA MS-LOT

And (p74):

Table 7.1: Summary of recommendations

No.	Actions
Quick Wins	
QW	1. Strengthen the pre-application process 2. Introduce consistent format for co-ordinates, site name and summary information 3. Update of Working Arrangements document 4. Integrate wellboat Marine Licence into the CAR Licence 5. Update Scottish Aquaculture portal

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Read my blog via http://donstaniford.typepad.com/my-blog

Please donate via https://scottishsalmonwatch.org/donate

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From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 13 October 2018 14:36
To: 'directormarinescotland@gov.scot'; 'terry.ahearn@sepa.org.uk'
Cc: 'Daniel.Pendrey@gov.scot'; 'FOI Helpdesk'; 'Mackinnon, Alison'; 'Neil.Purvis@gov.scot'; 'douglas.sinclair@sepa.org.uk'; 'Helen.McGregor@gov.scot'
Subject: Query: Wellboat data included or not included in Scotland's Aquaculture database?
Importance: High

Could Marine Scotland and SEPA please settle a spot of confusion re. the reporting (or not as the case may be) of chemical use via wellboats?

As background, in reply to my question - "Is the 2017 well-boat data on chemical use included in the data published via Scotland's Aquaculture?" - SEPA stated on 1 May 2018 (see email below):

"I have asked colleagues who confirm that it is not included on Scotland's Aquaculture page. However It is included in the SPRI figures that are published on SEPA's website."

SEPA further stated in a letter (attached) dated 29 May 2018:

[1] Wellboat chemical use is not reported on Scotland's Aquaculture Website.

However, a letter dated 28 June 2018 (attached) from Marine Scotland's Daniel Pendrey (copied in here) claimed that wellboat usage of chemicals has been included in the Scotland's Aquaculture database since 2014:

Your request

You asked for, "...information on well boat licences issued by MS-LOT to fish farm operators to permit the discharge of chemotherapeutants. Please provide copies of all well boat licences and copies of well boat licence returns detailing chemical use. Finally, please clarify whether the use of chemical via well boats is included in the data published via the Scotland's Aquaculture database:

http://aquaculture.scotland.gov.uk/data/fish_farms_monthly_biomass_and_treatment_reports.aspx i.e. Is well boat chemical use included or not via Scotland's Aquaculture database? If so, when was well boat chemical use data included?"

Response to your request

I enclose a link to most of the information you requested.

The answers to your questions in relation to Scotland's Aquaculture website are yes and 2014.

Please acknowledge receipt of this email request.

Please deal with informally if possible with a quick "SEPA was right" or "Marine Scotland was right" reply.

Alternatively, please deal with formally as a FOI request under the relevant FOI and Environmental Regulations.

If the latter (i.e. formally via a FOI request) please include any emails and information relating to the reporting (or not as the case may be) of chemical use in wellboats via the Scotland's Aquaculture database and/or Scottish Pollutant Release Inventory.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/

Read my blog via http://donstaniford.typepad.com/my-blog

Please donate via https://scottishsalmonwatch.org/donate

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From: Don Staniford [mailto:salmonfarmingkills@gmail.com]
Sent: 14 October 2018 07:13
To: 'ceu@scotland.gsi.gov.uk'
Subject: FOI re. wellboat biosecurity, cleaning and chemical waste discharges

Please provide information on wellboat biosecurity, cleaning and chemical waste discharges in relation to salmon farming in Scotland.

- Please include information relating to how and where the chemical wastes are discharged.

- Please include any operating procedures, guidelines, code of practice, regulations, notes and any other references to wellboat biosecurity, cleaning and chemical waste discharges in relation to salmon farming in Scotland.

- Please include information and data on where chemical wastes from wellboats are discharged.

- Please include information on cleaning of wellboats and where the wastes are discharged and any treatment.

As context, the Irish Government details advice on cleaning and disinfecting via "Wellboat Bio-security".

A SARF report - "Comparison of biosecurity measures in wellboats used in the Chilean, Scottish and Norwegian salmon farming industries" - published in 2013 included:

Conclusions and recommendations

In the majority of aspects well boats appear to be well regulated (Table 1), maintained and operated. Recommendations for potential improvements are summarized below.

Table 1. Comparison between regulations, codes of good practice and internal company measures

Country	Scotland			Norway			Chile		
Information type	Reg.	Code GP	Int. M.	Reg.	Code GP	Int. M.	Reg.	Code GP	Int. M.
Location for water loading									
Health requirement before fish loading				PD zone					
Fasting period before transport									
Water circulation type between sites						PD zone			
Location for water discharge				PD zone					
Well boat cleaning and disinfection									

1.Recommendations for Scotland, Norway and Chile

1.1. General

1.1.1. Given the importance of well boats in the salmon farming industries, a larger more representative study would be useful.

2. Recommendations for Scotland and Norway

2.1. Charging with water, a minimum distance from risk areas (sea sites and processing plant) should be specified, this may be a hydrographic distance rather than a straight line distance.

2.2.Discharging water or washing and rinsing tanks

- a minimum distance from sea sites and areas with concentrations of wild salmonids should be specified, this may be a hydrographic distance rather than a straight line distance.

- areas should be defined with either currents travelling to open sea or low risk of disease spread for other reasons.

2.3. Water charge/discharge areas should be identified in public documents so they will be available for all the well boat operators.

2.4. The identification of the areas and restrictions above may require additional research to confirm the nature of the risk.

A FOI reply in October 2017 from the Scottish Government (via FOI/17/02190) included an undated document (believed to be in relation to Dawnfresh):

Standard Operating Procedure for Bath Treatments on Wellboat

1. Ship shall be cleaned and disinfected as per requirements for area and previous operations according to industrial cleaning procedure.
   Recent preparations of the pyrethroids, organophosphates and H2O2 drug doses and administration time shall be indicated on the prescription provided with medication (trace data sheet).
2. Fish must be starved long enough so the water does not become contaminated by excrement or anything that degrades water quality and may inactivate bathing funds.
3. Use the boat's maximum equipment to ensure sufficient Dissolved Oxygen during treatment (lowest level of Dissolved Oxygen during treatments is > 7mg / l)
4. Greater care and careful judgment must be used in the handling of fish at low and high temperatures.
5. When the fish to be treated are loaded into the boat, external water exchange must run at maximum for at least 10 minutes. This is to ensure the reduction of excrement or anything which degrades the water and may inactivate treatment.
6. It is paramount that only essential personnel are involved in the treatment procedure.
   There must be a clear indication of who is responsible for all tasks and procedures, this must be established prior to loading.
   Crew must be extra vigilant to ensure that all systems are functioning correctly, i.e. that all relative valves are open/closed, pumps running. Crew must remain vigilant throughout the treatments.
7. Bath treatment of fish is a large and demanding task. This applies to both the boat and cages so it is essential to double check that all involved personnel have adequate training. Correct Health & Safety Procedures are also key to success in this same operation.
8. When handling the bathing medium, it is important to avoid skin contact with drug use and suitable protective clothing such as gloves, goggles, facemask when mixing and dosing of the product.
9. Record of water quality parameters shall be submitted to the fishfarm after finishing treatments.
10. Wellboat Circulation procedure is as follows.
    - When the fish are loaded, the DO2 must first be checked to ensure that it is safe to proceed with treatments.
    - When there is consensus between the Fishfarm Person in Charge and the Wellboat Bridge that the treatment may proceed the Circulation Pumps are changed from open circulation to closed circulation (great care must be taken to assure the water level in the tank is pressed full as a lower level can cause foaming which may affect the treatment.

- Pumps valves to be changed are starboard 700m3, port 700m3, starboard 350m3 and port 350m3.
- Only when it is confirmed that the pumps are all on closed circulation will the Hull Doors be closed.
- Before medicine is dosed there must be positive reporting from the bridge. It must never be assumed that systems are ready until this occurs. The same applies to communication between the person in charge of changing circulation and the bridge. There must always be positive reporting between personnel.

11. When it is confirmed that the tank is ready for dosing the agreed time must be double checked. It is the responsibility of the fishfarm management to ensure the correct amount of dose is used. This however must be agreed and clarified previously with the Wellboat Bridge. There will be two personnel responsible for the administration, one from the fishfarm and another from the wellboat. Both must witness and agree to the measurement of dosage. This safety procedure must be vigilantly applied.
There must also be two people responsible for the timing of the treatments. This is also logged in the ships log.
12. At any time the Wellboat operators, Fishfarm Person in Charge or any Authorised Authority have the right to abandon the treatment if there is a concern for the welfare of the fish.
13. When the time has elapsed circulation is changed from closed to open and the fish may be immediately unloaded to the pen. Careful observation of all water parameters is maintained throughout.

....

Signature Master Signature of Fishfarm Person in Charge

Date:

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

Don

Don Staniford

Director, Scottish Salmon Watch: https://scottishsalmonwatch.org/