

Graham Black  
Director of Marine Scotland  
Scottish Government  
1B South  
Victoria Quay  
EH6 6QQ  
Email: [Directormarinescotland@gov.scot](mailto:Directormarinescotland@gov.scot)

24 June 2020

Please consider this a formal request for a review of EIR 202000018350 replied to by the Scottish Government on 23 June 2020.

Scottish Salmon Watch's FOI request dated 28 February 2020 is also enclosed in full for context.

To narrow down the scope of the FOI request please include information since 27 October 2019 on funding/support by the salmon farming sector and dialogue with the salmon farming sector in relation to the West Coast Salmon Smolt Tracking Project and the Aquaculture Interactions Manager job.

For example, Document #2 disclosed on 23 June 2020 includes on p7 reference to Mowi:

EIR - 202000018350 - Docs for release - Two - 23 June 2020.pdf

**From:** [REDACTED] >  
**Sent:** 11 February 2020 16:53  
**To:** [REDACTED]  
**Subject:** RE: West Coast smolt tracking

Hi [REDACTED],

Thanks for your note.

Regarding the first point, I recognise that the cruise timings were made available early. Initially AST thought that they could not manage those timings due to delivery date for equipment and need to prepare moorings. Hence, [REDACTED] looked at options for charters. Then when prompted by [REDACTED], and because equipment was delivered early, AST did plan to use the Scotia slot (and it was this late arrangement that has led to deficits in detailed plans). Then they decided to use a Mowi vessel instead to secure better deployment times (to reduce risk of equipment loss).

I will discuss general details further with you when in Aberdeen to understand more fully whether or not we need staff trained to deploy kit and how costs are budgeted. No doubt [REDACTED] will consider operations options more generally in his review.

Please do retain the Scotia deployment time in the schedule. It is too early to finalise what resources will be required as the West Coast Tracking project develops.

[REDACTED]  
Scientific Ships Liaison Officer  
Marine Scotland – Science  
Scottish Government, Marine Laboratory, 375 Victoria Road, Aberdeen AB11 9DB

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



Hopefully this narrows down the FOI request for the Scottish Government to provide further information.

If not please consider this a new FOI request:

Please include any information relating to the 'West Coast Salmon Smolt Tracking Project' led by the Atlantic Salmon Trust [since the Scottish Government disclosed information via FOI-19-02451 in December 2019](#) (the FOI request was filed on 27 October 2019).

Please include any information relating to the [Aquaculture Interactions Manager job advertised in February 2020 by Fisheries Management Scotland](#) including any discussions on funding, remit, publicity and media since 27 October 2019.

This review request is also posted [online here](#).

If you have any queries please do not hesitate to contact me.

Thanks,

Don Staniford

Director, Scottish Salmon Watch

From: <Robin.MacLean@gov.scot>  
Date: Tue, Jun 23, 2020 at 5:11 PM  
Subject: Response - EIR 202000018350 - 23 June 2020  
To: <salmonfarmingkills@gmail.com>

Good afternoon Don,

Please see attached.

I apologise for the delay in getting this to you!

Best wishes,

Robin

**Aquaculture Hardship Fund/  
Aquaculture Stakeholder Engagment**  
Area 1B North  
VICTORIA QUAY, The Shore  
EDINBURGH  
EH6 6QQ  
Mob: 07741803441  
Tel: 0300 244 9574  
e: [Robin.MacLean@gov.scot](mailto:Robin.MacLean@gov.scot)

#### 4 Attachments



Directorate for Marine Scotland  
Aquaculture, Crown Estate, Recreational Fisheries, EMFF  
and Europe



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

T: 0300-244-49574  
E: [Robin.MacLean@gov.scot](mailto:Robin.MacLean@gov.scot)

Don Staniford  
By email: [salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)

Our ref: 202000018350

23 June 2020

Dear Mr Staniford,

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

Thank your request for information of 28 February 2020 under the Environmental Information (Scotland) Regulations 2004 (EIRs).

You have asked a number of questions, the response to these are set out below:

- *Please provide information on wild fisheries and salmon farming interactions since 1 July 2018.*

While our aim is to provide information whenever possible, under the exception at regulation 10(4)(b) of the EIRs a public authority may refuse a request for information if it is 'manifestly unreasonable'.

The Scottish Information Commissioner's guidance on the regulation 10(4)(b) exception at: <http://www.itspublicknowledge.info/Law/EIRs/EIRsExceptions.aspx> says that there may "be instances where it is appropriate for the Commissioner to consider the proportionality of the burden on the public authority in terms of the costs and resources involved in dealing with a request when considering the application of this exception".

In this case, we have identified over a thousand documents, the costs and resources involved in complying with the request would therefore be disproportionate and why a 20 working days extension to the response deadline (under regulation 7 of the EIRs) would still not make the request manageable. For these reasons, we consider that your request is manifestly unreasonable and so we are refusing it under regulation 10(4)(b).

As the exception is conditional we have applied the 'public interest test'. This means we have, in all the circumstances of this case, considered if the public interest in disclosing information outweighs the public interest in applying the exception.

Victoria Quay, Edinburgh EH6 6QQ  
[www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)



We have found that, on balance, the public interest lies in favour of upholding the exception. While we recognise that there may be some public interest in information about wild fisheries and salmon farming interactions since 1 July 2018 this is outweighed by the public interest in ensuring the efficient and effective use of public resources by not incurring excessive costs when complying with information requests.

You may however wish to consider reducing the scope of your request in order to make it manageable by focusing on a particular aspect of wild fisheries and salmon farming interactions since 1 July 2018.

You may also find it helpful to look at the Scottish Information Commissioner's 'Tips for requesting information under FOI and the EIRs' on his website at: <http://www.itspublicknowledge.info/YourRights/Tipsforrequesters.aspx>.

- *Specifically, please include emails, letters, correspondence, Cabinet Briefings, media lines and any information relating to the Atlantic Salmon Trust, Fisheries Management Scotland, the Scottish Salmon Producers Organisation, Mowi, Scottish Sea Farms, Loch Duart, Cooke, The Scottish Salmon Company, Grieg Seafood and any other salmon farming interests in relation to wild fisheries and salmon farming interactions since 1 July 2018.*
- *Please include any information on the 'Salmon Interactions Workstream' not already published via 'Note of Actions' and the Wild Salmon Interactions Working Group (subject of a FOI-18-01384 replied by the Scottish Government on 12 July 2018).*
- *For example, please provide copies of emails between members of the Wild Salmon Interactions Working Group.*
- *Please include any information relating to the 'West Coast Salmon Smolt Tracking Project' led by the Atlantic Salmon Trust (since the Scottish Government disclosed information via FOI-19-02451).*
- *For example, please provide copies of emails, letters and other correspondence including any discussions re. the disclosure of information FOI-19-02451, media coverage, press lines and comments in reaction to social media.*
- *Please include any information relating to the Aquaculture Interactions Manager job advertised in February 2020 by Fisheries Management Scotland including any discussions on funding, remit, publicity and media.*
- *For example, please provide copies of any budgets and financial contributions from the salmon farming industry, Scottish Government and other interests.*

I enclose a copy of some of the information you have requested (attached separately to covering email).

Some of the information you have requested is available from <https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/salmon> . Under regulation 6(1)(b) of the EIRs, we do not have to give you information which is already publicly available and easily accessible to you in another form or format. If, however, you do not have internet access to obtain this information from the website(s) listed, then please contact me again and I will send you a paper copy.

While our aim is to provide information whenever possible, in this instance we are unable to provide some of the information you have requested because an exception(s) under regulations 10(4)(d) (course of completion), r. 10(4)(e) (internal communication) and r.11(2) (personal information) of the EIRs applies to that information. The reasons why these exceptions apply are explained in the Annex to this letter.

#### The right to request a review

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

Graham Black  
Director of Marine Scotland  
Scottish Government  
1B South  
Victoria Quay  
EH6 6QQ  
Email: [Directormarinescotland@gov.scot](mailto:Directormarinescotland@gov.scot)

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

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at:

<http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>.

Yours sincerely,



Robin MacLean  
Stakeholder Engagement  
Aquaculture Policy Unit

An exception applies

**Regulation 10(4)(d) – material in course of completion, unfinished documents or incomplete data**

An exception under regulation 10(4)(d) of the EIRs (unfinished or incomplete information) applies to some of the information you have requested because it is material which is still in the course of completion.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is some public interest in release as part of open, transparent and accountable government.

However, this is outweighed by the public interest in ensuring that unfinished or incomplete information which is still in being worked on or is under active consideration is not disclosed when it might misinform the public or give a misleading impression of the Government's view or position on the matter to which the information relates.

**Regulation 10(4)(e) – internal communications**

An exception under regulation 10(4)(e) of the EIRs (internal communications) applies to some of the information you have requested because it is internal communication between Scottish Government officials about a particular FOI case.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception.

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

**Regulation 11(2) – applicant has asked for personal data of a third party**

An exception under regulation 11(2) of the EIRs (personal information) applies to some of the information requested because it is personal data of a third party and disclosing it would contravene the data protection principles in Article 5(1) of the General Data Protection Regulation and in section 34(1) of the Data Protection Act 2018.

This exception is not subject to the 'public interest test', so we are not required to consider if the public interest in disclosing the information outweighs the public interest in applying the exception.

[Facebook](#), 6 March 2020



### Inside Scottish Salmon Feedlots



6 hrs · 🌐

NEWS | Conflicted Conservationists?

Unseen documents reveal Fisheries Management Scotland and Atlantic Salmon Trust may be set to receive a six figure sum following a partnership with salmon farmers and Scottish Government.

A previously unseen Scottish Government document (Oct 2019) reveals that a partnership between the Scottish Government and the salmon farming industry is set to yield Fisheries Management Scotland (FMS) and Atlantic Salmon Trust over a hundred thousand pounds, as part of a £750,000 Smolt Tracking project.

This news comes shortly before a crunch meeting on the 9th March 2020 when FMS is set to attempt to conclude already delayed negotiations with the Scottish Government and the salmon farming industry regarding future regulation of the industry. The talks relate to the establishment of legal protection for wild salmon and sea trout from the impacts of open cage salmon farming called for as the result of two Parliamentary Inquiries in the Scottish Parliament in 2018.

ECCLR: [http://bit.ly/ECCLR\\_salmon\\_farming](http://bit.ly/ECCLR_salmon_farming)

REC: [http://bit.ly/REC\\_salmon\\_farming](http://bit.ly/REC_salmon_farming)

The project titled "West Coast Tracking" has the stated aim of,

"[informing] planning responses to coastal developments such as marine fish farms and renewable energy installations."

It goes on to suggest that the data may also be used to help the Scottish

Government respond to the results of the two Inquiries into Salmon Farming, both of which called for substantially tighter regulation of the salmon farming industry.

Corin Smith of [issf.org.uk](http://www.issf.org.uk) said:

"There seems to be no end for the need to study the decline of wild salmon and seatrout, and for a whole range of purposes except perhaps the most important one. Not once in the outlined design of this project, nor dozens of emails associated with it, does a single one of the participants ever mention the purpose being to protect, preserve or restore wild salmon and seatrout populations. The protection of wild fish appears to have been lost in a desperate race to milk a cash cow. It is a bit like partnering with tobacco companies to research the impact of smoking on public health. The restoration of wild salmon and seatrout populations in Scotland needs radical change delivered by truly committed, unconflicted and politically astute leadership. We don't have that."

The document suggests that an initial review of results from the tracking done in 2020 will be used to direct a full project in 2021 and 2022. No date was outlined for when the project was likely to conclude, nor when it would make recommendations that would inform the Scottish Government's response to the Salmon Farm Inquiries of 2018. Previous experience would suggest that even should the tracking project result in absolutely definitive findings, legislation would be unlikely much before 2025.

<https://www.gov.scot/publications/foi-19-02451-review/>

The salmon farming industry has rapidly expanded its potential size since the Inquiries of 2018, with nearly 80,000 tonnes of new salmon feedlot capacity in the planning pipeline. It would seem delay does benefit the Norwegian Seafood Corporations who own 95% of salmon farm capacity in Scotland.

The document outlined funding for FMS/AST including:

Staffing: £38,000

Travel: £38,000

Overheads: £11,000

AST Management: £38,000

It also outlines £30,000 for an, as yet unnamed, individual for the charter of a boat.

The current status of this proposed funding is unknown.

Both AST and FMS are yet to publicly support an ultimatum issued by a broad coalition of organisations in Scotland for tighter regulation of the salmon feedlot industry.

<https://www.salmon-trout.org/.../scottish-ministers-lamentab.../>

It seems two clear camps are emerging. Those who see regulation and legal protection for wild fish from salmon feedlots as the only guarantee of change, and those who believe appeasement, collaboration, research and nudging salmon farming is the answer.

It is time to pick a side.

For more information on the impacts of open cage salmon farming visit [www.issf.org.uk](http://www.issf.org.uk)

[#cleanuporclearout](#)





From: <casehandling.service@gov.scot>

Date: Fri, Feb 28, 2020 at 10:34 AM

Subject: Your Recent Enquiry with Scottish Government and partner agencies

To: <salmonfarmingkills@gmail.com>

Our Reference: 202000018350

Dear Don Staniford,

Thank you for your correspondence sent on 28/02/2020. Your query will be passed to the relevant area for consideration and has been given a reference number of 202000018350. Please quote this number in all correspondence. The Scottish Government aim to respond, where necessary, as quickly as possible and within the stated timescale as indicated on our website (<http://www.gov.scot/about/contact-information/how-to-request-information/>).

Yours sincerely

MiCase

Correspondence system for SG and partner agencies

From: **Don Staniford** <salmonfarmingkills@gmail.com>  
Date: Fri, Feb 28, 2020 at 10:26 AM  
Subject: FOI request re. Wild Fisheries & Salmon Farming Interactions  
To: <ceu@scotland.gsi.gov.uk>

Please provide information on wild fisheries and salmon farming interactions since 1 July 2018.

Specifically, please include emails, letters, correspondence, Cabinet Briefings, media lines and any information relating to the Atlantic Salmon Trust, Fisheries Management Scotland, the Scottish Salmon Producers Organisation, Mowi, Scottish Sea Farms, Loch Duart, Cooke, The Scottish Salmon Company, Grieg Seafood and any other salmon farming interests in relation to wild fisheries and salmon farming interactions since 1 July 2018.

Please include any information on the ['Salmon Interactions Workstream' not already published via 'Note of Actions'](#) and the [Wild Salmon Interactions Working Group \(subject of a FOI-18-01384 replied by the Scottish Government on 12 July 2018\)](#).

For example, please provide copies of emails between members of the Wild Salmon Interactions Working Group.

Please include any information relating to the 'West Coast Salmon Smolt Tracking Project' led by the Atlantic Salmon Trust ([since the Scottish Government disclosed information via FOI-19-02451](#)).

For example, please provide copies of emails, letters and other correspondence including any discussions re. the disclosure of information FOI-19-02451, media coverage, press lines and comments in reaction to social media.

Please include any information relating to the [Aquaculture Interactions Manager job advertised in February 2020 by Fisheries Management Scotland](#) including any discussions on funding, remit, publicity and media.

For example, please provide copies of any budgets and financial contributions from the salmon farming industry, Scottish Government and other interests.

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.

A PDF providing context to this FOI request is also attached.

Thanks,

Don Staniford

Director of Scottish Salmon Watch

**To: Scottish Government:** [ceu@scotland.gsi.gov.uk](mailto:ceu@scotland.gsi.gov.uk)  
**From: Scottish Salmon Watch**  
**Date: 28 February 2020**

**FOI request re. Wild Fisheries & Salmon Farming Interactions**

Please provide information on wild fisheries and salmon farming interactions since 1 July 2018.

Specifically, please include emails, letters, correspondence, Cabinet Briefings, media lines and any information relating to the Atlantic Salmon Trust, Fisheries Management Scotland, the Scottish Salmon Producers Organisation, Mowi, Scottish Sea Farms, Loch Duart, Cooke, The Scottish Salmon Company, Grieg Seafood and any other salmon farming interests in relation to wild fisheries and salmon farming interactions since 1 July 2018.

Please include any information on the ['Salmon Interactions Workstream' not already published via 'Note of Actions'](#) and the [Wild Salmon Interactions Working Group \(subject of a FOI-18-01384 replied by the Scottish Government on 12 July 2018\)](#).

For example, please provide copies of emails between members of the Wild Salmon Interactions Working Group.

Please include any information relating to the 'West Coast Salmon Smolt Tracking Project' led by the Atlantic Salmon Trust ([since the Scottish Government disclosed information via FOI-19-02451](#)).

For example, please provide copies of emails, letters and other correspondence including any discussions re. the disclosure of information FOI-19-02451, media coverage, press lines and comments in reaction to social media.

Please include any information relating to the [Aquaculture Interactions Manager job advertised in February 2020 by Fisheries Management Scotland](#) including any discussions on funding, remit, publicity and media.

For example, please provide copies of any budgets and financial contributions from the salmon farming industry, Scottish Government and other interests.

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 of Scottish Salmon Watch

As context:

Fish Farmer reported on 8 January 2020:

# Fish Farmer

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News

## Saving wild salmon should be 'national priority'

By Editors - 8th January 2020



Scottish environment minister Roseanna Cunningham

**THE Scottish government is funding a £750,000 project to track the migration of wild salmon smolt on Scotland's west coast.**

The measure was revealed last night following a meeting at Holyrood between politicians and wild fisheries representatives.



**NEWSLETTER**  
Stay in touch with the latest developments from Fish Farmer and subscribe to our online updates

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Salmon farmers were represented at the discussion by the Scottish Salmon Producers Organisation's sustainability director, Anne Anderson.

Fish Farming Expert [reported on 9 January 2020:](#)

[Home](#) > [News](#) > [Anglers back salmon tracking project after critic's attack](#)

# Anglers back salmon tracking project after critic's attack

Angling lobby group Salmon and Trout Conservation (S&TC) has issued a statement spelling out its support for a project to track wild smolts on the west coast of Scotland.

By [Gareth Moore](#)

The move follows anonymous criticism of the project which appeared briefly on anti-salmon farming Facebook site Inside Scottish Salmon Feedlots (ISSF) earlier this week and was also sent to Fish Farming Expert. ISSF manager Corin Smith told Fish Farming Expert he removed the post after realising it was anonymous.

“Given the content was critical I felt it was unfair the comments remained, as ISSF has always thrived on a policy of transparency with comment and discussion between real people,” said Smith.

### **‘Flawed and conflicted’**

The critic, who used the pen name “lakeselve” (Norwegian for “salmon river”), argued that the project is “deeply flawed and conflicted and is simply being used to delay the Scottish Government taking meaningful action to protect wild salmon from sea lice from open cage salmon farms on the West coast”.

“Lakeselve” claimed considerable doubts about the potential of the tracking project to work had been raised by Scottish Government scientists.

The critic continued: “The project is being part funded by private funds from salmon farming, which are being donated to the Atlantic Salmon Trust, who are meant to oppose salmon farming.

### **‘Delaying regulation’**

“The project is not about conservation of wild fish. It is about furthering the interests of salmon farming by delaying regulation.

“Others have also raised concerns that hundreds of receivers in the Minch and the West Coast risk lots of entanglement of whales, dolphins and seals.”

“Lakeselve” attached copies to correspondence, apparently obtained under a Freedom of Information request, in which Scottish Government employees pointed out possible pitfalls of using acoustic arrays to track tagged smolts on the west coast. These included the intensity and distribution of fishing.



# West Coast Salmon Smolt Tracking Project correspondence: EIR review

Published: **30 Dec 2019**

Directorate: [Marine Scotland Directorate](#)

Part of: [Marine and fisheries, Public sector](#)

Information request and response under the Environmental Information (Scotland) Regulations 2004.

**FOI reference:** FOI/19/02451

**Date received:** 27 Oct 2019

**Date responded:** 24 Dec 2019

## Information requested

Please provide any and all correspondence, no matter how related, email (or any other electronic means), telephone records and letters sent and received by Marine Scotland in relation to a project titled "West Coast Salmon Smolt Tracking Project" being undertaken by the Atlantic Salmon Trust.

Additionally please provide all correspondence (as previously defined) between Marine Scotland and the Atlantic Salmon Trust in 2019, to date.

**Response**

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

This exemption is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

I enclose a copy of most of the information you requested. This accompanies this letter, and is in the form of a single pdf document which includes all of the relevant emails and other documents we hold. Should you require a hard copy of this information, please let me know.

While our aim is to provide information whenever possible, in this instance we are unable to provide some of the information you have requested because exceptions under regulations 10(4)(d) (unfinished or incomplete information), regulation 10(4)(e) (internal communications) and regulation 11(2) (personal information) of the EIRs apply to that information. The reasons why those exceptions apply are explained in the Annex to this letter.

**Annex - Reasons for not providing information**

An exception under regulation 10(4)(d) of the EIRs (unfinished or incomplete information) applies to some of the information you have requested because it is material relating to discussions on potential funding levels and allocations and is not yet complete.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is some public interest in release as part of open, transparent and accountable government and this will be met by an announcement planned for early January 2020.

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An exception under regulation 10(4)(e) of the EIRs (internal communications) applies to some of the information you have requested because it is internal communication between Scottish Government officials, and between officials and Ministers about potential resourcing and financial support for the proposed "Missing Salmon project"; and the role which the Scottish Government / Marine Scotland would play in helping to take forward that project.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is some public interest in release as part of open, transparent and accountable government, and to inform public debate. However, there is a greater public interest in high quality policy and decision-making, and in the properly considered implementation and development of policies and decisions. This means that Ministers and officials need to be able to consider all available options and to debate those rigorously, to fully understand their possible implications. Their candour in doing so will be affected by their assessment of whether the discussions on Scottish Government's involvement in the West Coast Smolt Tracking Project will be disclosed in the near future, when it may undermine or constrain the Government's view on that issue while it is still under discussion.

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

### **About FOI**

The Scottish Government is committed to publishing all information released in response to Freedom of Information requests. View all FOI responses at <http://www.gov.scot/foi-responses>.



### [FOI/19/02451 - Information Released](#)

79 page PDF | 10.7 MB

[Download](#)

Documents disclosed via [FOI-19-02451](#) included [online here](#):

**From:** Mark Bilsby <mark@atlanticsalmontrust.org>  
**Sent:** 11 September 2019 10:42  
**To:** [REDACTED]@gov.scot>  
**Subject:** Briefing Papers

Dear [REDACTED]

Please find attached biographies for Colin Bull, Peter Landale and myself, along with a briefing note on the Missing Salmon Alliance.

We are due to receive the initial findings of the Moray Firth Tracking Project shortly and would intend to give a background to this project. It is described in the accompanying Missing Salmon Project brochure. This is relevant for two reasons (1) it is the largest salmon tracking ever undertaken in Europe and is on track to be the exemplar that will help establish where the salmon are being lost as they head down river and out to sea (2) Marine Scotland, Fisheries Management Scotland and the Atlantic Salmon Trust are currently forming a partnership to repeat this work on the west coast of Scotland, in order to understand salmon smolt migration through the aquaculture zone. We intend to accomplish this work by extending the partnership to include the aquaculture industry.



**marine scotland**  
**science**

T: [REDACTED]  
enquiries@gov.scot

Mark Bilsby  
Chief Executive Officer  
Atlantic Salmon Trust  
Battleby House  
Redgorton  
Perth  
PH1 3EW

Dear Mark,

9 October 2019

### **Partnership working between the Atlantic Salmon Trust and Marine Scotland Science**

It was a pleasure to meet you and [REDACTED] in Pitlochry on 26 April. The partnership working between the Atlantic Salmon Trust and Marine Scotland Science is helping to protect and sustain Scotland's iconic wild salmon species.

I am delighted that Marine Scotland is enabling the ground-breaking smolt tracking project on the West Coast [REDACTED]. Our teams are working closely to scope the annual budget and project deliverables, including how MSS might help with the receiver deployment phase.

We spoke about the multi-year nature of the project. The project's scale and ambition is such that one year will not be sufficient to deliver the West Coast data that all stakeholders so desperately require for conservation and planning purposes. While I cannot yet promise Government funding for future years I can commit to considering the case for Year 2 funding in April/May 2020. I think it would be reasonable to assume that the Government would look favourably on supporting the AST [REDACTED]

[REDACTED] However, I must stress that expenditure for Year 2 that relies on Government funding should not be committed in advance of funding surety. It is also the case that the Government would intend to run a competitive bidding scheme for Year 2 of the 'Gove' monies so this project would need to compete with other priorities. I suggest the tracking and tagging elements that AST are content to fund independently via donor/industry contributions are prioritised and contracts that fall later in the financial year await a 'Gove monies' funding decision.

[REDACTED]

Marine Laboratory, PO Box 101, 375 Victoria Road,  
Aberdeen AB11 9DB  
[www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)



We discussed the establishment of a formal governance Board to guide the delivery of the project. I suggest such a Board involve MSS, Marine Scotland colleagues, AST, SEPA and the aquaculture industry.

I am copying this letter to Dr John Armstrong and Mike Palmer, Head of ACRE.

Yours,

Tim

Tim McDonnell OBE  
Head Marine Scotland Science

**From:** Mark Bilsby  
**Sent:** Thursday, 10 October 2019 22:07  
**To:** [REDACTED]  
**Cc:** [REDACTED] Mcdonnell T (Tim)  
**Subject:** Re: MFFS

Evening [REDACTED]

All being well there will not be a short fall in the funding and it was a quirk in the form that [REDACTED] helped us with. The money from the aquaculture industry, if and when confirmed, should cover the shortfall. The noises from the industry have been positive so far and we should have a better idea when I meet them all tomorrow.

If you need clarification on any of the information then please let me know.

Kind regards

Mark

**From:** Mark Bilsby <mark@atlanticsalmontrust.org>  
**Sent:** 11 October 2019 13:56  
**To:** Mcdonnell T (Tim); [REDACTED]; [REDACTED] ms.scot; [REDACTED]  
**Subject:** West Coast Tracking Project

Dear All,

Thank you for all your support and hard work to get this application over the line. It has now been submitted electronically and a copy in the post.

I had a positive meeting with the aquaculture industry this morning and we will hear formally from them in early November, following an SSPO Board Meeting.

On 13 January 2020 the Scottish Government's [web-page on the 'Salmon Interactions Workstream'](#) reads:



**i** These pages are no longer being updated. Any updates will be published in the [Salmon and Recreational Fisheries section on gov.scot](#).

Marine and Fisheries

Salmon & Recreational Fisheries

- International Year of the Salmon
- Salmon Interactions**
- Wild Fisheries Reform
- Game Fisheries
- Coarse Fisheries
- Recreational Sea Angling
- Angling Working Group
- Eels
- Science & Research

Salmon Interactions Workstream

A Salmon Interactions Workstream has been launched to look, in part, at the reasons behind the decline in Scottish Atlantic salmon.

The first stage of the Workstream is the creation of an initial Working Group, independently chaired by John Goodlad, which will examine and provide advice on the interactions between wild and farmed salmon.

The membership of the Group, which is supported by the Scottish Salmon Producer's Organisation and Fisheries Management Scotland, includes the aquaculture and wild fisheries sectors, Scottish Environment Link (SELINK), Marine Scotland, the Scottish Environment Protection Agency (SEPA) and Scottish Natural Heritage (SNH). Initially, the Group will:

- Look at the conclusions and any emerging recommendations from the Parliamentary Inquiries into farmed salmon in Scotland

A - Z

Contact

- Evaluate current Scottish Government policy and advice governing wild/farmed salmon sea lice interactions, and review the existing and planned projects around the interactions
- Make recommendations, including a delivery plan of agreed actions and timescales, for a future interactions approach.

Meetings

Details of meetings can be seen below. Please note that draft documents that are still under development will not be published on the webpage until they are complete.

- 31 October 2018 (below)
- 28 November 2018 (below)
- 15 January 2019 (below)
- 27 February 2019 (below)
- 30 May 2019 (below)
- 09 September 2019 (below)
- 28 November 2019 (below)

**Downloadable documents:**

<b>Title:</b>	Salmon Interactions
<b>Description:</b>	Salmon Interactions
<b>File:</b>	Interactions Working Group - Note of Actions - 31 October 2018 [DOCX, 30.8 kb: 19 Dec 2018] <a href="#">Open</a>   <a href="#">Open in new window</a>
<b>File:</b>	Interactions Working Group - Note of Actions - 28 November 2018 [DOCX, 33.9 kb: 24 Jan 2019] <a href="#">Open</a>   <a href="#">Open in new window</a>
<b>File:</b>	Interactions Working Group - Note of Actions - 15 January 2019 [DOCX, 26.0 kb: 10 Jun 2019] <a href="#">Open</a>   <a href="#">Open in new window</a>
<b>File:</b>	Interactions Working Group - Note of Actions - 27 February 2019 [DOCX, 28.2 kb: 10 Jun 2019] <a href="#">Open</a>   <a href="#">Open in new window</a>
<b>File:</b>	Interactions Working Group - Note of Actions - 30 May 2019 [DOCX, 41.3 kb: 18 Dec 2019] <a href="#">Open</a>   <a href="#">Open in new window</a>
<b>File:</b>	Interactions Working Group - Note of Actions - 09 September 2019 [DOCX, 27.8 kb: 18 Dec 2019] <a href="#">Open</a>   <a href="#">Open in new window</a>
<b>File:</b>	Interactions Working Group - Note of Actions - 28 November 2019 [DOCX, 23.5 kb: 18 Dec 2019] <a href="#">Open</a>   <a href="#">Open in new window</a>
	<a href="#">Viewer Help</a>

['Notes of Actions' dated 28 November 2019](#) included:

### **3. Update from Anne Anderson and Alan Wells – Recommendations**

3.1. JG reminded the Group that SSPO and FMS have been engaged in exploratory bilateral discussions on recommendations with a view to sharing with the SIWG before going back to their respective boards for approval.

3.2. AW delivered a presentation relating to the above, noting that the content is subject to change and has not yet been agreed by SSPO and FMS.

3.3. Topics discussed included salmonid conservation, the regulatory regime governing finfish aquaculture, how current fora related to farmed and wild fish interact with each other, Environment Management Plans, Technical Working Group, sea lice monitoring, escapes/ introgression and research needs.

3.4 There was much comment and feedback from those present, all of which would be reflected in next round of bilateral discussions.

3.5 A further report on these bilateral discussions would be tabled at the next meeting.

In July 2018, the Scottish Government [disclosed information via FOI-18-01690](#):



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**PUBLICATION - FOI/EIR RELEASE**

# Correspondence, emails and minutes for Interactions Working Group: EIR release

Published: **17 Jul 2018**

Directorate: [Marine Scotland Directorate](#)

Part of: [Marine and fisheries](#), [Public sector](#)

Information request and response under the Environmental Information (Scotland) Regulations 2004.

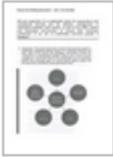
**FOI reference:** FOI/18/01690

**Date received:** 14 June 2018

**Date responded:** 12 July 2018

## Information requested

- Please provide all information relating to the Interactions Working Group - as detailed online via <http://www.gov.scot/Topics/marine/Fish-Shellfish/MGSA/Interactionsworkinggroup>
- Please include emails, correspondence, minutes of meetings, Cabinet Briefings, dialogue with the SSPO and other industry partners as well as any other information pertaining to the Interactions Working Group since it was first mooted (prior to Spring 2013) and subsequently 'disbanded' (believed to be in 2015).
- Please include specific details on how, why and when the Interactions Working Group was disbanded.



[FOI-18-01690 related documents 1.pdf](#)

8 page PDF | 1.2 MB

[Download](#)



[FOI-18-01690 related documents 2.pdf](#)

6 page PDF | 309.5 kB

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[FOI-18-01690 related documents 3.pdf](#)

6 page PDF | 133.0 kB

[Download](#)

In July 2018, the Scottish Government [disclosed information via FOI-18-01384](#):



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**PUBLICATION - FOI/EIR RELEASE**

# Wild Salmon and Aquaculture Interactions Working Group: EIR review

Published: **16 Jul 2018**

Directorate: [Marine Scotland Directorate](#)

Part of: [Marine and fisheries](#), [Public sector](#)

Information request and response under the Environmental Information (Scotland) Regulations 2004.

**FOI reference:** FOI/18/01384

**Date received:** 19 June 2018

**Date responded:** 12 July 2018



[Fol-18-01384 Wild Farmed Interactions Table.pdf](#)

[Download](#)

6 page PDF | 144.8 kB

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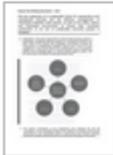


[Fol-18-01384 MGSA meeting - 4 November 2013 - Chairs Update - Interactions.pdf](#)

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[Fol-18-01384 MGSA Interactions Working Group - Extracts from Briefing Documents.pdf](#)

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[Fol-18-01384 Wild Salmon and Aquaculture Interactions Working Group Emails re next steps \(update\).pdf](#)

6 page PDF | 100.5 kB

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[Fol-18-01384 Wild Salmon and Aquaculture Interactions Working Group Emails re Chair Selection.pdf](#)

4 page PDF | 64.8 kB

[Download](#)



[Fol-18-01384 Wild Salmon and Aquaculture Interactions Working Group Chair Selection.pdf](#)

4 page PDF | 298.4 kB

[Download](#)

The Ferret [reported in June 2018](#) (also [reported in The Sunday Herald](#)):



In February 2020, Fisheries Management Scotland [advertised for a job working with the salmon farming industry as an 'Aquaculture Interactions Manager'](#):



## Vacancies

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### **Aquaculture Interactions Manager with Fisheries Management Scotland**

Fisheries Management Scotland has an established track record in advocating for the protection and preservation of Scotland's wild salmon and freshwater fish, along with developing their fisheries and protecting wider environment on which they depend.

**Post:** Aquaculture Interactions Manager with Fisheries Management Scotland based in Edinburgh. It is expected that this post will be funded for a period of three years, following a review after year one and satisfactory performance reviews.

The Aquaculture Interactions Manager will support Fisheries Management Scotland's members in efforts to manage interactions between farmed and wild salmonid fish, with the aim of protecting and restoring wild salmonid populations. This is a vital element of Fisheries Management Scotland's work, particularly in the context of declines in Scotland's Atlantic salmon and sea trout populations.

A key element of this role will be to develop and maintain professional engagement with the aquaculture industry to support the production of environmental management plans (or successor arrangements) and monitoring strategies to understand and address any local impacts on wild salmonid fish.

Current and anticipated future changes to the regulatory system present an opportunity to develop working arrangements which improve the situation for wild salmonids in the 'aquaculture zone'. This focus on aquaculture interactions will complement efforts by Fisheries Management Scotland to address a wide range of pressures which Scotland's salmon sea trout and freshwater fish currently face. The post-holder will work with Fisheries Management Scotland members to support local engagement, refine monitoring protocols and to develop guidance and advice where required.

The post will attract a salary of £45-47,000.

**Deadline:** The deadline for applications to be received by Fisheries Management Scotland is 9am on Thursday 12<sup>th</sup> March 2020.

Interviews will be held at Fisheries Management Scotland Office.

Please note we expect to hold interviews on week commencing 23rd March.

More details can be found in the [Job Description](#)

The job description [included](#):

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## Job Description

### **Aquaculture Interactions Manager**

**Main Location: Edinburgh**



#### **Job Overview**

Fisheries Management Scotland is the representative body for Scotland's District Salmon Fishery Boards, Rivers and Fisheries Trusts and the River Tweed Commission. The post holder will support Fisheries Management Scotland's members in developing and maintaining positive and professional engagement with the aquaculture industry at a local level. The post holder will support fisheries managers in efforts to manage interactions between farmed and wild salmonid fish, with the aim of restoring and enhancing wild salmonid populations. The post holder will engage with the aquaculture industry to support the production of environmental management plans (or successor arrangements) and monitoring strategies to understand and manage any local impacts on wild salmonid fish.

#### **Reports To**

The Aquaculture Interactions Manager will report to the Chief Executive Officer of Fisheries Management Scotland.

#### **Fields of Responsibility**

The primary role of the Aquaculture Interactions Manager is to improve the current level of liaison and collaborative working between wild fisheries managers (DSFBs and Fisheries Trusts) and the Scottish finfish aquaculture industry. Current and possible future changes to the approach to regulation of the finfish sector present an opportunity to develop and maintain a much stronger degree of positive engagement, particularly in relation to environmental management plans (or successor arrangements) which are now a condition of all new and expanding farms.

Fisheries Management Scotland has established a Fish Farming Committee to inform policy and facilitate two-way communication between Fisheries Management Scotland and relevant DSFBs and Fisheries Trusts. The post holder will work with Fisheries Management Scotland members to support local engagement and to develop guidance and advice where required.

Fisheries Management Scotland plays an important role in national workstreams relating to finfish farming and interactions between the two sectors. The post-holder will be expected to support the Chief Executive in engaging with these *fora* and where appropriate will take the lead in representing Fisheries Management Scotland.

Fisheries Management Scotland [reported in January 2020](#):

[ABOUT](#) ▾[POLICY](#) ▾[EVENTS](#) ▾[PUBLICATIONS](#)[CAREERS](#) ▾[NEWS](#) ▾[Home](#) / [Salmon Farming](#)

## Salmon Farming

We recognise that aquaculture is vital to Scotland's economy and the West Coast of Scotland in particular. However, our focus is on ensuring that the development of the industry is firmly grounded in the principles of sustainable development.

Fisheries Management Scotland has established a [committee](#) to help develop our policy and coordinate thinking on fish farming. Various reports and outputs from our members, and work previously coordinated by Rivers and Fisheries Trusts of Scotland is included at the bottom of this page. Fisheries Management Scotland, and our member District Salmon Fishery Boards and Fisheries Trusts in those areas where salmon farming takes place wish to see:

- Thriving salmon and sea trout populations and fisheries without negative impacts arising from salmon farming;
- A harmonious local coexistence with an industry that understands the importance of being a good neighbour and communicates openly and transparently with stakeholders;
- A world-leading regulatory and planning system which protects wild migratory fish and proactively seeks to address any local negative impacts; and
- Investment of a proportion of any profits generated into the protection and improvement of local salmon and sea trout populations and fisheries.

## Local Monitoring

In addition the Fishery Trusts in the aquaculture zone have for a number of years undertaken a programme of sweep netting to monitor juvenile sea trout and record the infestation pressure of sea lice. This work, which was previously coordinated by RAFTS as part of their "Managing Interactions" programme, is funded by Marine Scotland and we are grateful for this continuing support. The outputs from the sweep netting programme, and wider elements of the managing interactions project can be viewed below:

[2019 – Sweep Netting Data](#)

[2018 – Sweep Netting Data](#)

[2017 – Sweep Netting Report](#)

[2017 – Sweep Netting Data](#)

[2016 – Sweep Netting Data](#)

[2014 – RAFTS Sweep Netting Report](#)

[2013 – RAFTS Technical report on locational guidance and zones of sensitivity](#)

[2013 – RAFTS MIAP Genetics Report](#)

[2013 – RAFTS Sweep Netting Report](#)

[2012 – RAFTS Sweep Netting Report](#)

[2011 – RAFTS Sweep Netting Report](#)

In August 2018, Fisheries Management Scotland reported on ['The Laxford Sea Trout Tracking Project'](#) - including:

### **The Sea Trout**

Sea trout are among Scotland's most iconic angling species and their presence indicates clean and healthy aquatic ecosystems. Sadly, they are under threat and are listed as a UK Biodiversity Action Plan priority species. Some of the threats to sea trout survival include exploitation, predation, habitat degradation, pollution, and barriers to migration (preventing them from accessing spawning grounds). Additionally, natural sea lice populations can multiply within coastal salmon farms potentially leading to dangerous infestations on wild sea trout.

Loch Duart Ltd, (the local salmon farming company) has been instrumental in helping this project get off the ground through the provision of staff and boats. They are fully committed to progressive aquaculture practices to ensure sustainable rearing of salmon.

Alban Denton, Managing Director, of Loch Duart Ltd said, "Loch Duart has helped fund and participated in the WSFT since its inception so obviously we are delighted to be assisting the WSFT with this project."

Fisheries Management Scotland [reported in May 2018](#):

## Fisheries Management Scotland Fish Farming Meeting Minutes



9 May 2018

### 5. Financial support for fisheries management

AW provided an update on recent discussions with industry about financial assistance for fisheries management in the aquaculture zone. Recent discussion with the industry have focussed on the governance of the process and a number of possible options were discussed. It is the aspiration of Fisheries Management Scotland to conclude the process by September 2018.

**ACTION: AW** to progress discussions with the industry and report back to the Committee and Fisheries Management Scotland Board.

Lest people forget how the salmon farming industry have a long history of blocking projects:

[https://www.robedwards.com/2002/04/fish\\_farmers\\_bl.html](https://www.robedwards.com/2002/04/fish_farmers_bl.html)

<https://www.robedwards.com/2012/07/keeping-salmon-farming-problems-secret.html>