

**SCOTTISH
SALMON WATCH**



CHEMICALS

Subject: FOI Review re. 2020-00058631 dated 31 August 2020

Date: 2 September 2020

To: Director of Marine Scotland

Please consider this a formal request for a review of [FOI-2020-00058631 replied to by the Scottish Government on 31 Aug 2020](#). For easy reference, Scottish Salmon Watch's FOI request dated 8 July 2020 is available [online here](#).

In summary, Scottish Salmon Watch asks the Scottish Government to reconsider the refusal to disclose various documents and data. Please provide the information requested in July 2020.

Scottish Salmon Watch takes issue with a number of refusals; namely:

1) Well Boat Data on the Use of Toxic Chemicals:

Our FOI request [dated 8 July 2020](#) included:

- 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.

The Scottish Government's [FOI refusal letter dated 31 Aug 2020](#) included:

Response to your request

1. The completed 2018 Discharge Returns have already been provided to you under the following EIRs request which you made in 2019: FoI/19/02442 released on 18 November 2019. Our response to this request was published on our website last year: <https://www.gov.scot/publications/?publicationTypes=foi-eir-release&page=1/>

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.

We do not yet hold completed Discharge Returns for 2019 or 2020.

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 of an exception under regulation 10(4)(a) (information not held) of the EIRs applies to that information. The reasons why this exception applies is explained in the Annex to this letter.

The Discharge Returns for 2019 should be completed by the end of September 2020. The Discharge Returns for 2020 should be completed within the first half of 2021.

The annual Discharge Return data is published each year by the Scottish Environment Protection Agency (SEPA). The 'Scottish Pollutant Release Inventory' (SPRI) 2019 will be published on 29 September 2020 at 09:30.

However, documents disclosed via [FOI-2020-00058631 on 31 Aug 2020](#) refer to 2019 data on well boats (presumably emailed via Excel spreadsheets) shared by the Scottish Government with SEPA (PDF #1):

From: [Redacted] [@sepa.org.uk](mailto:sepa.org.uk)>
Sent: 16 June 2020 13:45
To: [Redacted] [@gov.scot](mailto:gov.scot)>
Subject: RE: Wellboat Treatments 2018

Hi [Redacted]

Are you able to provide details of wellboat treatments during 2019 for our SPRI team please?

Thanks very much
[Redacted]

From: [Redacted] [@gov.scot](mailto:gov.scot)>
Sent: 16 June 2020 14:34
To: [Redacted] sepa.org.uk>
Subject: RE: Wellboat Treatments 2018

Hi [Redacted]

I've actually moved to another team but I've forwarded your email for action so hopefully you will receive them soon.

Kind regards

[Redacted]

Business Casework Manager
Marine Scotland - Marine Planning & Policy

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

If the Scottish Government received the data for 2019 "soon" after 16 June 2020 then why was it not disclosed via this FOI?

Moreover PDF #1 also details how the Scottish Government sent spreadsheets of data to SEPA with 2018 data in March 2019:

From: [Redacted] <[Redacted]@gov.scot>
Sent: 20 March 2019 12:59
To: [Redacted] <[Redacted]@sepa.org.uk>
Subject: Wellboat Treatments 2018

Dear [Redacted]

Please find attached the spreadsheet detailing wellboat treatments at Marine Fish Farms during 2018, for forwarding to your SPRI team please.

Kind Regards

[Redacted]

Marine Licensing Casework Manager
Marine Scotland - Marine Planning & Policy

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

Direct Line: [Redacted]
General Queries: +44 (0)300 244 5046
Email: [Redacted] <[Redacted]@ms.marinelicensing@gov.scot>
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

Why did this FOI reply which asked for information since 1 October 2018 not include these spreadsheets?

Please note that a [previous Scottish Government FOI reply \(19-02442\) in November 2019](#) failed to disclose Excel spreadsheets (which allow the easy collation of data) but instead [provided the data in PDF format via Dropbox](#) (Scottish Salmon Watch argues that the disclosure of the data in PDF format rather than in the original Excel format contravenes FOI law).

A recent email exchange with the Scottish Government also resulted in a refusal of access to the spreadsheet:

From: <ms.bod@gov.scot>
Date: Wed, Sep 2, 2020 at 11:32 AM
Subject: FW: E - Your recent correspondence with Scottish Government and partner agencies - 202000058631 - Don Staniford
To: <salmonfarmingkills@gmail.com>
Cc: <ms.bod@gov.scot>

Dear Don Staniford,

Good morning and thank you for your email request below.

The reason the spreadsheet referred to in PDF #1 was not included in our disclosure was explained in point 1 of my letter of response for your case reference 202000058631:

“The completed 2018 Discharge Returns have already been provided to you under the following EIRs request which you made in 2019: FoI/19/02442 released on 18 November 2019. Our response to this request was published on our website last year: <https://www.gov.scot/publications/?publicationTypes=foi-eir-release&page=1/>”

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.”

Please find a copy of the spreadsheet referred to in PDF #1 that was published online at the following web link:

<https://www.gov.scot/publications/foi-19-02442/>

Within the letter of response there was a link to the documents disclosed which were contained in a DropBox folder:

<https://www.dropbox.com/sh/wqi69zheyd0e0t2/AADzfWrgjEuMgUcoLJ0eMkVqa?dl=0>

PDF #s 52 to 57 inclusive are copies of the 6 sheets/pages of the spreadsheet that you have requested below.

Kind regards,

Kate Webb

Business Casework Officer – Business and Operational Delivery
Licensing Operations Team - Marine Planning & Policy - Marine Scotland - Scottish
Government

Address: Marine Laboratory - 375 Victoria Road - Aberdeen - AB11 9DB

Direct Line: **Temporarily n/a** - General Queries: **Temporarily n/a**

Email: kate.webb@gov.scot - ms.marinelicensing@gov.scot

Web: <https://www.gov.scot/policies/marine-and-fisheries-licensing/>

This email was in reply to:

From: Don Staniford <salmonfarmingkills@gmail.com>

Sent: 01 September 2020 19:25

To: Central Enquiry Unit <CEU@gov.scot>

Subject: Re: Your recent correspondence with Scottish Government and partner agencies - 202000058631

Please provide a copy of the spreadsheet referred to in PDF #1 of the FOI disclosure; namely:

From: [Redacted] [@gov.scot](mailto:info@gov.scot)>
Sent: 20 March 2019 12:59
To: [Redacted] sepa.org.uk>
Subject: Wellboat Treatments 2018

Dear [Redacted]

Please find attached the spreadsheet detailing wellboat treatments at Marine Fish Farms during 2018, for forwarding to your SPRI team please.

Kind Regards

[Redacted]

Marine Licensing Casework Manager
Marine Scotland - Marine Planning & Policy

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

Direct Line: [Redacted]
General Queries: +44 (0)300 244 5046
Email: [Redacted] ms.marinelicensing@gov.scot
Website: <http://www.gov.scot/Topics/marine/licensing/marine>

Please therefore provide Excel spreadsheets of data for well boats as sent by the Scottish Government to SEPA in March 2019 and "soon" after 16 June 2020. Scottish Salmon Watch argues that PDF copies of Excel spreadsheet pages is not in compliance with FOI law since it deliberately conceals the data and renders it difficult to process and collate the information.

Finally, the Scottish Government's [FOI refusal letter dated 31 Aug 2020](#) claimed that it did not have well boat discharge returns for 2019 and 2020.

ANNEX

REASONS FOR NOT PROVIDING INFORMATION

1. An exception under regulation 10(4)(a) (information not held) of the EIRs applies to some of the information you have requested

Under the terms of the exception at regulation 10(4)(a) of the EIRs (information not held), the Scottish Government is not required to provide information which it does not have. The Scottish Government does not hold the information you have requested regarding Discharge Returns for 2019 & 2020.

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. While we recognise that there may be some public interest in the Discharge Returns, clearly we cannot provide information which we do not hold.

But if SEPA is going to publish SPRI returns for 2019 at the end of September 2020 then surely the Scottish Government has already collated the data via Excel spreadsheets and shared them with SEPA? And surely data for 2020 has already been submitted to the Scottish Government in some shape or form?

In any case, as part of this FOI please double-check whether data on well boat use of toxic chemicals and in particular Excel spreadsheets have been omitted from the Scottish Government's FOI reply and disclose the data as requested on 8 July 2020.

If this data only became available after 8 July 2020 then please consider this a new FOI request for data on well boat use of toxic chemicals by the salmon farming industry since 1 January 2019.

2) Internal Communications:

The Scottish Government's [FOI refusal letter dated 31 Aug 2020](#) includes:

ANNEX

REASONS FOR NOT PROVIDING INFORMATION

5. (ii) An exception under regulation 10(4)(e) (internal communications) of the EIRs applies to some of the information you have requested

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 Ministers and/or officials about an amendment to the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011, which is required in order to transfer responsibility for the authorisation of discharges of chemical treatment residues to the water environment via a well boat from marine licensing to CAR licensing.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, there is 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 these rigorously, to fully understand their possible implementations. Their candour in doing so will be affected by their assessment of whether the discussions on the amendment to the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011 will be disclosed in the near future, when it may undermine or constrain the Government's view on that policy while it is still under discussion and development.

Scottish Salmon Watch objects to the refusal and believes that the Scottish Information Commissioner would take a different view. "Candour" and transparency from Scottish Government officials is what taxpayers and the public alike expect as a bare minimum of open government. However, to use candour as an excuse not to be transparent is sinking to a new low.

Scottish Salmon Watch therefore asks the Scottish Government to disclose the documents as requested on 8 July 2020 and shed light on the internal discussions.

As Scottish Salmon Watch outlined in our [FOI request dated 8 July 2020](#):

"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."

Scottish Salmon Watch's [FOI request dated 8 July 2020](#) also included:

"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."

The Appendix cited:

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&IncludeBr=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/spria/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.

Scottish Salmon Watch is therefore interested in any further internal discussions and asks the Scottish Government to reconsider refusal on internal communications as it could shed light on the issue.

3) Other Information:

The Scottish Government's [FOI refusal letter dated 31 Aug 2020](#) includes the claim that it does not hold information in relation to discussions with companies; namely:

2. (i) An exception under regulation 10(4)(a) (information not held) of the EIRs applies to some of the information you have requested

Under the terms of the exception at regulation 10(4)(a) of the EIRs (information not held), the Scottish Government is not required to provide information which it does not have. The Scottish Government does not hold the information you have requested relating to discussions of wellboat data on chemical use by salmon farms via 'Scotland's Aquaculture' and dialogue with chemical companies or salmon farmers.

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. While we recognise that there may be some public interest in discussions the Scottish Government has had regarding wellboat data on chemical use by salmon farms via 'Scotland's Aquaculture' Aquaculture' and dialogue with chemical companies or salmon farmers, clearly we cannot provide information which we do not hold.

It is clear from the [FOI disclosure on 31 Aug 2020](#) that there has been dialogue with salmon farming companies including the Scottish Salmon Producers Organisation. For example, PDF #7 appears to provide evidence that the SSPO was briefed before the Cabinet Secretary:

[Redacted]

From: [Redacted]
Sent: 18 June 2020 17:03
To: [Redacted] <scottishsalmon.co.uk>
Cc: [Redacted] <sepa.org.uk>
Subject: Transferring well-boat licensing from Marine Scotland to SEPA
Attachments: Wellboats - transfer to CAR - discussion paper.docx

Hi [Redacted]

As you are aware an exercise to transfer responsibility for well-boat discharge authorisations from Marine Scotland to SEPA has been mooted several times over recent years. Within SG we have now secured the policy and legal resource to take this forward as soon as the due legal and Parliamentary processes allow. The current aim is to finalise the draft SSI by the end of August, with it coming into force in November.

We have made good progress in identifying the necessary transitional arrangements. We are now at a stage when we can share that thinking with the industry, and discuss how this might work in practice to make sure we have considered all likely eventualities. With that in mind, I attach a short paper that sets out how we expect the transition to take effect. I would be grateful if you could circulate this to your member companies, and we would be happy to talk through any initial feedback or queries you might have at the next regulators meeting on 30 June. We can explore at that point what further discussion/ engagement may be appropriate.

Regards
[Redacted]

PDF #2 also includes reference to the industry:

From: [Redacted] @gov.scot>
Sent: 22 June 2020 15:41
To: Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>
Cc: Cabinet Secretary for Rural Economy and Tourism <CabSecRET@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; DG Economy <DGEconomy@gov.scot>; Director of Environment & Forestry <director.enfor@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; [Redacted] @gov.scot>; [Redacted] gov.scot>; [Redacted] @scotland.gsi.gov.uk>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] gov.scot>; [Redacted] @gov.scot>; Communications Covid-19 <CommunicationsCovid-19@gov.scot>
Subject: Transferring responsibility for the authorisation of well boat discharges from Marine Scotland to SEPA - submission

Cabinet Secretary for the Environment, Climate Change and Land Reform,

Please find attached an update regarding the transfer of responsibility for the authorisation of well boat discharges from Marine Scotland to SEPA.

[Redacted]

[Redacted] [Redacted] – Environmental Quality and Circular Economy Division
Currently working from home – [Redacted]

From: [Redacted] @gov.scot> On Behalf Of Cabinet Secretary for Rural Economy and Tourism
Sent: 23 June 2020 08:50
To: [Redacted] gov.scot>; Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>
Cc: Cabinet Secretary for Rural Economy and Tourism <CabSecRET@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; DG Economy <DGEconomy@gov.scot>; Director of Environment & Forestry <director.enfor@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; [Redacted] @gov.scot>; [Redacted] gov.scot>; [Redacted] @scotland.gsi.gov.uk>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted] @gov.scot>; Communications Covid-19 <CommunicationsCovid-19@gov.scot>
Subject: RE: Transferring responsibility for the authorisation of well boat discharges from Marine Scotland to SEPA - submission

Hi [Redacted]

[Redacted] has noted for his interests and would be grateful for advice regarding the industry's reaction to this.

Many thanks,

[Redacted] | Deputy Private Secretary
Cabinet Secretary for Rural Economy and Tourism
☎: [Redacted]

[Redacted]

I am also pleased to advise that we are continuing to make arrangements for the transfer of wellboat licensing into the CAR regime by way of a statutory instrument and we will be in touch in due course to arrange a discussion about transitional arrangements.

[Redacted]

[Redacted]

Yours sincerely,

[Redacted]

Graham Black
Director Marine Scotland

Cc:- Fergus Ewing MSP – CabSecRE@gov.scot

Scottish Salmon Watch suspects there is more correspondence and information which has not been disclosed. Could you please double-check your files and records for any information which was missed out from our [FOI request dated 8 July 2020](#).

For example, Scottish Salmon Watch is sceptical that further information does not exist in relation to what appears to be a flood of well boat licences [filed with Marine Scotland](#) which kick-started in November 2019; namely:

Menu Selection

[Home](#) > [Documents](#)

Marine Licence documentation

Maps Info Data

Filter on Title

Items per page

- All -

Apply

Title	Updated date
Marine Licence - Wellboat Discharge - Westbister, Scapa Flow - 00008773	28/08/2020
Marine Licence - Wellboat Discharge - Greanamul, Isle of Benbecula - 07299	17/08/2020
Marine Licence Application - Wellboat Discharge - Torr Mor, Clashnessie Bay - 07345	06/08/2020
Marine Licence Application - Wellboat Discharge - Tarbert South, Loch Fyne - 07361	04/08/2020
Marine Licence - Wellboat Discharge - Strone, Loch Carron - 07349	03/08/2020
Marine Licence - Wellboat Discharge - Taranaish, Loch Roag - 07342	03/08/2020
Marine Licence - The Scottish Salmon Company - Wellboat Discharge - Gravir West, Loch Odhairn, Isle of Lewis - 07331	03/08/2020
Marine Licence - Wellboat Discharge - Strone, Loch Striven - 07300	03/08/2020
Marine Licence Application - Wellboat Discharge - Setterness South, Shetland - 07382	30/07/2020
Marine Licence - Wellboat Discharge - Vidlin Outer, Vidlin Voe - 07304	17/07/2020
Marine Licence - Wellboat Discharge - Vidlin North, Vidlin Voe - 07303	17/07/2020
Marine Licence - Wellboat Discharge - Mangaster Outer, Mangaster Voe - 07302	17/07/2020
Marine Licence - Wellboat Discharge - Bellister, Dury Voe - 07301	17/07/2020
Marine Licence Application - Wellboat Discharge - Strondoir Bay, Loch Fyne - 07359	16/07/2020
Marine Licence - Wellboat Discharge - Meall Mhor, Loch Fyne - 07332	09/07/2020
Marine Licence - Wellboat Discharge - Eughlam North, East Loch Roag - 07298	09/07/2020
Marine Licence - Wellboat Discharge - Loch Tuath, Isle of Mull - 07310	09/07/2020
Marine Licence - Wellboat Discharge - Trilleachan Mor, Isle of Harris - 07308	09/07/2020
Marine Licence - Wellboat Discharge - Eughlam South, East Loch Roag - 07307	09/07/2020
Marine Licence - Wellboat Discharge - Gob a Bharra, Loch Fyne - 07312	09/07/2020
Marine Licence - Wellboat Discharge - Vacasay, East Loch Roag - 07311	09/07/2020
Marine Licence - Wellboat Discharge - Vuia Mor, Loch Roag, Isle of Lewis - 07320	09/07/2020
Marine Licence - Wellboat Discharge - Gravir, Outer Ordhairn, Isle of Lewis - 07319	09/07/2020
Marine Licence - Wellboat Discharge - Ardyne, Loch Striven, Argyll and Bute - 07318	09/07/2020
Marine Licence - Wellboat Discharge - Aird, Loch Torridon - 07333	09/07/2020
Marine Licence - Wellboat Discharge - Glenan Bay, Loch Fyne - 07335	09/07/2020
Marine Licence Application - Wellboat Discharge - Strone, Loch Carron - 07349	06/07/2020
Marine Licence Application - Wellboat Discharge - Rubha Stillaig, Loch Fyne - 07350	06/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Cooke Aquaculture Scotland Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Dawnfresh Farming Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Grieg Seafood Shetland Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Kames Fish Farming Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - MOWI Scotland Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Scottish Sea Farms	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - The Scottish Salmon Company	03/07/2020
Marine Licence Application - Wellboat Discharge - Holms Geo, Shetland - 07328	30/06/2020
Marine Licence Application - Wellboat Discharge - Aird, Loch Torridon - 07333	29/06/2020
Marine Licence Application - Wellboat Discharge - Teisti Geo, Shetland - 07327	25/06/2020
Marine Licence Application - Wellboat Discharge - Lippie Geo, Shetland - 07326	25/06/2020
Marine Licence Application - Wellboat Discharge - Taranaish, Loch Roag - 07342	22/06/2020
Marine Licence Application - Wellboat Discharge - Portree, Isle of Skye - 07341	22/06/2020
Marine Licence Application - The Scottish Salmon Company - Wellboat Discharge - Gravir West, Loch Odhairn, Isle of Lewis - 07331	17/06/2020

Marine Licence Variation - Wellboat Discharge - Bagh Dail Nan Ceann, Loch Shuna - 06897	17/06/2020
Marine Licence Application – Wellboat Discharge – Kenmore, Loch Torridon – 07334	17/06/2020
Marine Licence Application – Wellboat Discharge – Glenan Bay, Loch Fyne - 07335	17/06/2020
Marine Licence Application – Wellboat Discharge – Meall Mhor, Loch Fyne - 07332	17/06/2020
Marine Licence Application - Wellboat Discharge - Strone, Loch Striven - 07330	16/06/2020
Marine Licence Application – Wellboat Discharge – Vuia Mor, Loch Roag, Isle of Lewis - 07320	08/06/2020
Marine Licence Application – Wellboat Discharge -Gravir, Outer Ordhairn, Isle of Lewis - 07319	08/06/2020
Marine Licence Application – Wellboat Discharge – Ardyne, Loch Striven, Argyll and Bute - 07318	08/06/2020
Marine Licence Application – Wellboat Discharge – Gob a Bharra, Loch Fyne - 07312	08/06/2020
Marine Licence Application – Wellboat Discharge – Trilleachan Mor, Isle of Harris - 07308	05/06/2020
Marine Licence - Wellboat Discharge - Plocrapol, Isle of Harris - 07260	05/06/2020
Marine Licence - Wellboat Discharge - Uiskevagh, Benbecula - 07246	05/06/2020
Marine Licence - Wellboat Discharge - Petersport North, Benbecula - 07245	05/06/2020
Marine Licence - Wellboat Discharge - Petersport South, Benbecula - 07244	05/06/2020
Marine Licence - Wellboat Discharge - Eport, North Uist - 07243	05/06/2020
Marine Licence Application – Wellboat Discharge – Vacasay, East Loch Raog - 07311	05/06/2020
Marine Licence Application – Wellboat Discharge – Loch Tuath, Isle of Mull – 07310	05/06/2020
Marine Licence Application - Wellboat Discharge - Greanamul, Isle of Benbecula - 07299	03/06/2020
Marine Licence Application - Wellboat Discharge - Vidlin Outer, Vidlin Voe - 07304	03/06/2020
Marine Licence Application - Wellboat Discharge - Vidlin North, Vidlin Voe - 07303	03/06/2020
Marine Licence Application - Wellboat Discharge - Mangaster Outer, Mangaster Voe - 07302	03/06/2020
Marine Licence Application - Wellboat Discharge - Bellister, Dury Voe - 07301	03/06/2020
Marine Licence Application - Wellboat Discharge - Eughlam South, East Loch Roag - 07307	03/06/2020
Marine Licence Application - Wellboat Discharge - Eughlam North, East Loch Roag - 07298	03/06/2020
Marine Licence Variation Application - Wellboat Discharge - East Tarbert Bay, Argyll - 06512	07/05/2020
Marine Licence Variation Application - Wellboat Discharge - Geasgill Fish Farm, Isle of Mull - 06367	07/05/2020
Marine Licence Application - Wellboat Discharge - Coledeep, Shetland - 07273	06/05/2020
Marine Licence Application - Wellboat Discharge - Gob Na Hoe, Isle of Skye - 07274	06/05/2020
Marine Licence Application - Wellboat Discharge - Maragay Mor, Benbecula - 07284	06/05/2020
Marine Licence Variation - Wellboat Discharge - Swining 3, Setterness - 07154	01/05/2020
Marine Licence Application – Wellboat Discharge – West Strome, Loch Carron - 07265	21/04/2020
Temporary Marine Licence Variation (08 April 2020) - Wellboat Discharge - Loch Duart Limited	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - Cooke Aquaculture Scotland Ltd	20/04/2020

Temporary Marine Licence Variation (08 April 2020) - Wellboat Discharge - Kames Fish Farming Ltd	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - The Scottish Salmon Company	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - Scottish Sea Farms Ltd	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - MOWI Scotland Ltd	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - Grieg Seafood Shetland Ltd	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - Dawnfresh Farming Ltd	20/04/2020
Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - Cooke Aquaculture Scotland Ltd	20/04/2020
Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - Dawnfresh Farming Ltd	20/04/2020
Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - Grieg Seafood Shetland Ltd	20/04/2020
Temporary Marine Licence Variation (16 April 2020) - Wellboat Discharge - Kames Fish Farming Limited	20/04/2020
Temporary Marine Licence Variation (16 April 2020) - Wellboat Discharge - Loch Duart Limited	20/04/2020
Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - The Scottish Salmon Company	20/04/2020
Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - Scottish Sea Farms Ltd	20/04/2020
Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - MOWI Scotland Ltd	20/04/2020
Marine Licence - Wellboat Discharge - Hunda, Orkney - 07229	17/04/2020
Marine Licence Application - Wellboat Discharge - Eport, North Uist - 07243	15/04/2020
Marine Licence Application - Wellboat Discharge - Petersport South, Benbecula - 07244	15/04/2020
Marine Licence Application - Wellboat Discharge - Petersport North, Benbecula - 07245	15/04/2020
Marine Licence Application - Wellboat Discharge - Uiskevagh, Benbecula - 07246	15/04/2020
Marine Licence Application - Wellboat Discharge - Plocrapol, Isle of Harris - 07260	15/04/2020
Marine Licence - Wellboat Discharge - Invasion Bay, Loch Sunart - 07064	08/04/2020
Licence - Wellboat Discharge - Poll na Gille, Shuna - 07211	08/04/2020
Marine Licence Variation Application - Wellboat Discharge - Bagh Dail Nan Ceann, Loch Shuna - 06897	06/04/2020
Marine Licence - Wellboat Discharge - Maclean's Nose, Loch Sunart - 06855	03/04/2020
Marine Licence Variation Application - Wellboat Discharge - Bagh Dail Nan Ceann Fish Farm, Loch Shuna - 06879	03/04/2020
Marine Licence - Wellboat Discharge - Sgian Dubh, Loch Striven - 07226	03/04/2020
Marine Licence - Wellboat Discharge - Reibinish, Isle of Harris - 07223	03/04/2020
Marine Licence - Wellboat Discharge - Sgeir Dughall, Loch Torridon - 07224	03/04/2020
Marine Licence Variation - Wellboat Discharge - Foraness South, Setterness - 07136	03/04/2020
Marine Licence Variation - Wellboat Discharge - Setterness North, Setterness - 07124	03/04/2020
Marine Licence - Wellboat Discharge - Hogan, Hoganess, Shetland - 07266	02/04/2020
Marine Licence - Wellboat Discharge - Holm of Gruting, Hoganess, Shetland - 07267	02/04/2020
Marine Licence Application - Wellboat Discharge - Poll na Gille, Shuna - 07211	25/03/2020
Marine Licence Application - Wellboat Discharge - Hunda, Orkney - 07229	23/03/2020
Marine Licence Application - Wellboat Discharge - Camus Glas, Loch Sunart - 07210	17/03/2020
Marine Licence Application - Wellboat Discharge - Gometra, Isle of Mull - 07222	05/03/2020
Marine Licence Application - Wellboat Discharge - Sgian Dubh, Loch Striven - 07226	04/03/2020
Marine Licence Application - Wellboat Discharge - Sgeir Dughall, Loch Torridon - 07224	04/03/2020
Marine Licence Application - Wellboat Discharge - Reibinish, Isle of Harris - 07223	04/03/2020
Marine Licence Application - Wellboat Discharge - Westerbister, Scapa Flow - 07212	03/03/2020
Marine Licence - Wellboat Discharge - Setterness North, Setterness - 07124	31/01/2020
Marine Licence - Wellboat Discharge - Foraness South, Setterness - 07136	31/01/2020
Marine Licence - Wellboat Discharge - Swining 3, Setterness - 07154	31/01/2020
Marine Licence - Wellboat Discharge - Scalpay Multi-Trophic Aquaculture Ltd - 06853	31/01/2020
Marine Licence Variation Application - Wellboat Discharge - Colonsay, Isle of Colonsay - 07002	31/01/2020
Marine Licence Variation - Wellboat Discharge - Colonsay, Isle of Colonsay - 07002	31/01/2020
Marine Licence - Wellboat Discharge - Loch Alsh, Highlands - 06949	31/01/2020
Marine Licence - Wellboat Discharge - Sicoka, Ronas Voe - 07192	30/01/2020
Marine Licence - Wellboat Discharge - West of Burwick, Shetland - 07126	29/01/2020
Marine Licence - Wellboat Discharge - North Voe, Shetland - 07171	29/01/2020
Marine Licence Variation - Wellboat Discharge - Spelve B, Loch Spelve - 06726	29/01/2020
Marine Licence - Wellboat Discharge - Scoreholms, Shetland - 07125	29/01/2020
Marine Licence - Wellboat Discharge - North Papa, Shetland - 07132	29/01/2020
Marine Licence - Wellboat Discharge - Langa, Shetland - 07130	29/01/2020
Marine Licence - Wellboat Discharge - Portnalong, Loch Harport - 07140	29/01/2020
Marine Licence - Wellboat Discharge - North Havra, Shetland - 07129	29/01/2020

Marine Licence Application - Wellboat Discharge - Slcoka, Ronas Voe - 07192	08/01/2020
Marine Licence - MOWI Scotland Ltd - Wellboat Discharge - 07005	23/12/2019
Marine Licence- Wellboat Discharge- Djubawick, Shetland- 06930	23/12/2019
Marine Licence- Wellboat Discharge- Belmont, Shetland- 06932	23/12/2019
Marine Licence- Wellboat Discharge- Burkwell, Shetland- 06937	23/12/2019
Marine Licence- Wellboat Discharge- Bastaness, Shetland- 06940	23/12/2019
Marine Licence - Wellboat Discharge - Loch Duich - 06311	23/12/2019
Marine Licence- Wellboat Discharge- Uyea Isle, Shetland- 06929	23/12/2019
Marine Licence- Wellboat Discharge- Kirkabister, Shetland- 06938	23/12/2019
Marine Licence- Wellboat Discharge- Vatsetter, Shetland- 06935	23/12/2019
Marine Licence- Wellboat Discharge -Hascosay, Shetland- 06939	23/12/2019
Marine Licence- Wellboat Discharge- Winna Ness, Shetland- 06945	23/12/2019
Marine Licence- Wellboat Discharge- Chalmers Hope, Orkney-06950	23/12/2019
Marine Licence- Wellboat Discharge- West Fara, Orkney- 06958	23/12/2019
Marine Licence- Wellboat Discharge- Quaterness, Orkney- 06960	23/12/2019
Marine Licence- Wellboat Discharge- North Sandwick, Shetland- 06934	23/12/2019
Marine Licence Variation - Wellboat Discharge - An Camus, Loch Boisdale - 06391	23/12/2019
Marine Licence - Wellboat Discharge - Noust Geo, Orkney - 07137	23/12/2019
Marine Licence - Wellboat Discharge - Lober, Scapa Flow, Orkney - 07034	05/12/2019
Marine Licence Variation Application - Wellboat Discharge - Spelve B, Loch Spelve - 06726	05/12/2019
Marine Licence Application - Wellboat Discharge - North Voe, Shetland - 07171	04/12/2019
Marine Licence Application - Wellboat Discharge - Swining 3, Setterness - 07154	04/12/2019
Marine Licence Application - Wellboat Discharge - North Havra, Shetland - 07129	04/12/2019
Marine Licence Application - Wellboat Discharge - Foraness South, Setterness - 07136	04/12/2019
Marine Licence Application - Wellboat Discharge - North Papa, Shetland - 07132	04/12/2019
Marine Licence Application - Wellboat Discharge - Langa, Shetland - 07130	04/12/2019
Marine Licence Application - Wellboat Discharge - West of Burwick, Shetland - 07126	04/12/2019
Marine Licence Application - Wellboat Discharge - Scoreholms, Shetland - 07125	04/12/2019
Marine Licence Application - Wellboat Discharge - Setternes North, Shetland - 07124	04/12/2019
Marine Licence Application - Wellboat Discharge - Portnalong, Loch Harport - 07140	02/12/2019
Marine Licence Variation Application - Wellboat Discharge - Maclean's Nose, Loch Sunart - 06855	21/11/2019
Marine Licence - Wellboat Discharge - Carness Bay, Shapinsay - 06916	21/11/2019
Marine Licence - Wellboat Discharge - South Cava, Scapa Flow - 06913	21/11/2019
Marine Licence - Wellboat Discharge - Lyrawa Bay, Orkney - 06942	21/11/2019
Marine Licence - Wellboat Discharge - Pegal Bay, Scapa Flow - 06933	19/11/2019
Marine Licence Application - Wellboat Discharge - Eday, Orkney - 07137	15/11/2019
Marine Licence Application - Wellboat Discharge - Wick of Gruting, Shetland - 07104	11/11/2019
Marine Licence- Wellboat Discharge- Grey Horse Channel Outer, Cheesebay- 07066	06/11/2019
Marine Licence- Wellboat Discharge- Grey Horse Channel, Cheesebay, North Uist- 07084	06/11/2019
Marine Licence- Wellboat Discharge- Groatay, Cheesebay, North Uist- 07085	06/11/2019
Wellboat Discharge - 06753 - Marine Licence	31/10/2018
Wellboat Discharge - 05824 - Marine Licence Variation	18/10/2018
Wellboat Discharge - 05824/16/0 - Marine Licence	18/10/2018
Wellboat Discharge - 05824 - Chart	18/10/2018
Wellboat Discharge - 05824 - GIS Chart	18/10/2018
Wellboat Discharge - 06614 - Map	20/09/2018
Wellboat Discharge - 06614 - Marine Licence Application	20/09/2018
Wellboat Discharge - 06614 - GIS Map	20/09/2018
Wellboat Discharge - 06753 - Marine Licence Application	18/09/2018
Wellboat Discharge - 06753 - GIS Map	18/09/2018
Wellboat Discharge - 06753 - Maps	18/09/2018
Wellboat Discharge - 06741 - Marine Licence Application	13/09/2018
Wellboat Discharge - 06741 - Map	13/09/2018
Wellboat Discharge - 06741 - GIS Map	13/09/2018

Scottish Salmon Watch suspects that there must be further information - including emails and other discussion - shedding light on this issue.

In conclusion, could you please reconsider the FOI refusals and take further time to assess whether all the information requested has been disclosed.

Please provide a receipt for this FOI review request.

Thanks,

Don Staniford

Director, Scottish Salmon Watch