



George Eustice
Secretary of State for Environment, Food and Rural Affairs
Department for Environment, Food & Rural Affairs
2 Marsham Street
London
SW1P 4DF

4 February 2022

Dear Secretary of State,

**Welfare Abuse on Salmon Farms
– clear breaches of the Animal Health and Welfare (Scotland) Act 2006
re. ‘cleaner fish’ and farmed salmon**

In view of the lethal trade in ‘cleaner fish’, [Scamon Scotland](#) (formerly called Scottish Salmon Watch) calls on the UK Government to address the mortality, welfare and disease problem of salmon farms using wrasse (mostly caught in the wild) and lumpfish (mostly farmed). Please find enclosed below a letter sent to the Scottish Government earlier this week on this vital issue (the letter to Scottish Ministers dated 1 February 2022 is also available [online here](#)).

Scamon Scotland calls on the UK Government (via the Animal and Plant Health Agency) to scrutinize salmon farms during 2022 for evidence of welfare abuse of cleaner fish (as well as farmed salmon) with a view to prosecutions of salmon farming companies.

It is becoming increasingly clear that salmon farms – with respect to both ‘cleaner fish’ (wrasse and lumpfish) and farmed salmon – are systematically breaching the [Animal Health and Welfare \(Scotland\) Act 2006](#) ([Section 19: Unnecessary Suffering](#) and [Section 24: Ensuring Welfare of Animals](#)).

Yet it appears that APHA is not routinely inspecting salmon farms in relation to cleaner fish welfare. If so, that is a clear dereliction of the UK Government’s statutory duty to enforce welfare laws and failure to police welfare abuse.

When [APHA did inspect Mowi’s ‘Bay of the Dead Heads’ salmon farm in August 2019](#) following [secret filming by Scottish Salmon in July 2019 which exposed clear evidence of welfare abuse](#), APHA merely [wrote to Mowi in September 2019](#) helpfully pointing out that they had broken the law:



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Strathearn House
Broxden Business Park
Lamberkine Drive
Perth
PH1 1RX

T 03000600704

www.gov.uk/apha

Mowi Scotland Limited

Farms Office

Glen Nevis Business Park
Fort William
PH33 6RX

16 September 2019

Dear [REDACTED]

Failure to Comply with Welfare Legislation

Animal Health and Welfare (Scotland) Act 2006

Following my visit on 2/08/19 to inspect your livestock at Marine Fin Fish farm (Atlantic Salmon) FFMC54 BDNC- Bagh Dail nan Ceann (Bay of the Dead Heads) in the Sound of Jura, in the presence of [REDACTED] (site Manager), [REDACTED] (Mowi's Area Manager), [REDACTED] (APHA VA) and [REDACTED] (FHI Marine Scotland), I must advise you that I found the following non-compliances with current welfare legislation.

Mortality in lumpfish has been a known ongoing issue, affecting the 80% of the lumpfish stocked during this production cycle at the above fish site under your responsibility.

On the day of the visit at the site (02/08/19), data provided by your staff regarding your investigation of mortality and consequential actions was not satisfactory. [REDACTED] Seeking for a health plan for lumpfish at the site at the time of the visit and further clarification regarding the health management for the investigated period, a second meeting as part of the investigation took place at APHA Perth office on Tuesday 13/08/19 with yourself, [REDACTED] (Lead Vet) and [REDACTED] (Health Manager).

During this meeting, evidence were provided of investigations and actions taken to try and minimise an increasing mortality trend in lumpfish from May 2019 until the treatment provided in between 01/07/19 to 03/07/19. After this day, there is little evidence of actions taken whilst the mortality in lumpfish continued to increase.

During the meeting on the 13/08/2019 you confirmed that a decision to humanely cull the remaining lumpfish had been taken the day before and had already started.

You have not been able to show that adequate actions were taken in the period between the 10/07/19 to the 12/08/19 in order to promote the welfare of the lumpfish under your responsibility. Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease.

This is a failing to comply with the Animal and Welfare (Scotland) Act 2006, Part 2-24 (1) and 3(e) that states that:

"a person commits an offence if the person do not take such steps as are reasonable in the circumstances to ensure that the needs of an animal for which the person is responsible are met to the extent required by good practice";

An animal's needs include *"its need to be protected from suffering, injury and disease."*

As discussed during the onsite visit and the second meeting, it would be helpful to keep separated records for mortality and culled animal not only for salmon as you are correctly doing, but also for lumpfish and wrasse in order to have a detailed monitoring system for all species under your responsibility.

This letter is without prejudice to any further enforcement or other action, which may be taken at a later date.

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

[REDACTED]

APHA

[REDACTED]

Mobile: [REDACTED]

Email Address: [REDACTED]@apha.gov.uk

At least, APHA's letter ended by calling on Mowi to record mortalities of cleaner fish. Is that mortality information now available for Mowi and other salmon farming companies? Was enforcement or any other action taken against Mowi? Please consider this a formal request for information under the relevant FOI and Environmental Information regulations if that would engender an actual reply to this letter. Please provide a receipt for this FOI request.

Scamon Scotland has published further information today on mortalities of cleaner fish via a new blog: [50 Million Cleaner Fish Die Each Year on Norwegian Salmon Farms - how many millions die on Norwegian-owned salmon farms in Scotland \(& Ireland\)?](#)

This begs the killer question: how many cleaner fish are suffering unnecessarily on salmon farms and dying a cruel death each year?

If 150,000 cleaner fish are dying each day – 50 to 60 million per year – on salmon farms in Norway then a conservative estimate (if the mortality rate on salmon farms in Scotland is the same as in [Norway which has more stringent welfare laws and regulations in place for cleaner fish welfare](#)) puts the mortality on salmon farms in Scotland at 21,000 per day and 7 to 9 million per year. Note that Norwegian salmon farming production is [reported by Kontali as 1,369,000 tonnes in 2020](#) compared to the [2020 Scottish Fish Farm Production Survey published by the Scottish Government which estimates salmon farming production in Scotland as 192,000](#) – i.e. Scottish salmon farming production is ca. 14% or seven times less than Norwegian salmon farming production.

Whatever the true figure of cleaner fish mortality – and the public will never know as even salmon farming companies admits “black loss” (less fish retrieved at end of cycle than expected) – a 40 to 60% mortality rate for cleaner fish on salmon farms - [as estimated by researchers in Norway](#) and in a [report published by the Nordic Council of Ministers in December 2021](#) - is unacceptable from a welfare point of view.

For example, the [Scottish Government's Fish Health Inspectorate 'Case Information' for 2021](#) includes an inspection of The Scottish Salmon Company's Gometra salmon farm off the Isle of Mull which referred to "black loss" with a report from Gometra salmon farm off the Isle of Mull in June 2021 detailing: "Mortality is not being identified when cleaner fish stick to sides of pen and don't end up in mort basket before rotting away".

This week's [letter dated 1 February 2022 to Scottish Ministers](#) (enclosed below for easy reference) collates 'Case Information' published by the Scottish Government's Fish Health Inspectorate thus far detailing inspections of salmon farms during 2021 (with selected information cited from 2019) in relation to welfare abuse of cleaner fish – including 333,519 cleaner fish mortalities (both wrasse and lumpfish). Mowi's North Shore salmon farm in Loch Erisort reported the highest mortality rate at 49% with 117,414 dead cleaner fish:

Cleaner fish 'Case Information' published by the Fish Health Inspectorate in 2021								
Date	Company	Site	Species	# on site	Mort #s	% Mortality	% stocking	Details recorded by FHI 'Case Information'
Oct	Scottish Sea Farms	Toyness	Wrasse	5,953	5,765	47	6	First cyle of stocking wild caught wrasse (12,187 input in Sept 2021)
Oct	Mowi	North Shore	Both	149,728	117,414	49	46	234,028 lumpfish from Ocean Matters in Wales & 63,668 wild wrasse
Oct	Mowi	Tabhaigh	Both	67,650			12	Farmed lumpfish and wild caught wrasse on site
Oct	The Scottish Salmon Co	Druimyeon Bay	Lumpfish	50,000			14	Lumpfish on site from Ocean Matters
Oct	The Scottish Salmon Co	Portree	Lumpfish	90,980		12.4		Lumpfish (Ocean Matters) morts "attributed to general background losses"
Oct	The Scottish Salmon Co	East Tarbert Bay	Lumpfish	70,000			17	Lumpfish from Ocean Matters & Otter Ferry
Oct	Scottish Sea Farms	Westerbister						"Site to stock wrasse (local wild caught from Orkney) to help combat rising sea lice levels"
Sept	Mowi	Caolas a Deas	Both	90,720	53,596		100	Morts in lumpfish due to sea lice treatment (freshwater) & Tenacibaculum
Sept	Scottish Sea Farms	Scallastle Bay	Wrasse	16,705			3	Ballan wrasse caught from the wild; hoping to get lumpfish
Aug	Mowi	Invasion Bay	Both	135,046	4,971		24	Lumpfish morts due to "emancipation", Pseudomonas, wounds & fin damage
Aug	Mowi	Camas Glas	Both	79,506	16,323		12	Morts due to decomposition, wounds, fin damage & culling
July	The Scottish Salmon Co	West Strome	Lumpfish	61,013			12	Lumpfish from Otter Ferry & Swansea University
July	Mowi	Ardintoul	Lumpfish	216,733	48,499	22.3	12	Florfenicol (antibiotic) treatment for Pseudomonas infection in lumpfish
July	Mowi	Duich	Both	48,409	27,000	37	7	Lumpfish morts "attributed to a Flavivirus infection that was transferred from the supplier" (Ocean Matters); wild caught wrasse from Skye & Weymouth
July	The Scottish Salmon Co	Sgian Dubh	Wrasse	27,000			3	Wild wrasse
June	Mowi	Ornish Island	Lumpfish	19,072	2,612	5.13	5	Lumpfish came from Ocean Matters in May 2021
June	Loch Duart	Calva Bay	Wrasse	1,400			0.3	
June	The Scottish Salmon	Gometra	Both	37,121	43,945		11	Issues with "black loss" (less fish retrieved at end of cycle than expected) "Mortality is not being identified when cleaner fish stick to sides of pen and don't end up in mort basket before rotting away"
June	The Scottish Salmon	Geasgill	Lumpfish	90,711	1,414		12	"Black loss" with cleaner fish described as "most vulnerable to bad weather"
June	The Scottish Salmon	Vuia Mor	Lumpfish	51,749			11	
June	The Scottish Salmon	Kyles of Vuia	Lumpfish	46,838			9	
June	The Scottish Salmon	Gravir	Both	66,294			8	Morts "above expected since input"; "company not 100% sure of the cause"
June	Scottish Sea Farms	Fada	Wrasse					"Wrasse brought over from Ireland during last cycle"
June	The Scottish Salmon	Taranaish	Both					"Locally caught wrasse later in the summer & lumpfish in the autumn/winter"
June	Scottish Sea Farms	Nevis A	Both	45,900	2,353		31	"Elevated mortalities..related to treatments & some higher sea temperatures"
June	Scottish Sea Farms	Nevis C	Both	7,732	2,632		12	Lumpfish "imported from Ireland for this cycle (2020), not planning to do this in the future"; Morts due to increased water temperatures
May	The Scottish Salmon	Druimyeon Bay	Lumpfish	65,611	1,340	2	10	
May	The Scottish Salmon	East Tarbert Bay	Lumpfish	88,114	2,061		11	0.88% weekly mortality of lumpfish in Week 19 of 2021
May	Mowi	Poll na Gille	Both	79,612		30 & 13	13	Wild wrasse "caught around Mull, Loch Melfort & some were imported from Ireland (not since last inspection)"; 30% lumpfish & 13% wrasse mortality

May	Mowi	Bagh Dail Nan Cean	Both	170,833		4.4 & 1.2	43	"Very few wrasse observed"; 4.4% lumpfish & 1.2% wrasse mortality
May	Kames Fish Farming	SW Shuna	Lumpfish	88,000		7.2	16	Lumpfish (from Otter Ferry) mortality "attributed to handling"
May	Mowi	Harpport	Both	34,463			13	Farmed & wild Ballan wrasse, wild Corkwing wrasse & lumpfish; "Cages stocked with wild wrasse reported to have had fewer sea lice interventions"
May	Mowi	Scalpay	Both	54,000			13	
May	Scottish Sea Farms	Spelve	Wrasse	8,792			2	Wild caught wrasse from West coast of Scotland
April	Scottish Sea Farms	Kempie Bay	Lumpfish	13,696			12	"Movement of lumpfish from out with GB (sic) onto site from Bantry at end of 2020. Health certificates inspected on site"
April	Scottish Sea Farms	Sian Bay	Lumpfish	31,845			12	Same details as Kempie Bay case above
April	Scottish Sea Farms	Shuna	Both	11,525			16	Wild wrasse from West coast of Scotland & lumpfish from Republic of Ireland
April	Mowi	Kingairloch	Both	30,731	3,594		13	Wrasse "left over from last cycle, with risk assessment"; Lumpfish "increased mortality due to freshwater treatments...try to remove cleaner fish prior to treatments"

Mowi's Caolas a Deas salmon farm in Loch Shell on the Isle of Lewis reported in September 2021 that "it has been accepted by industry that freshwater treatments will lead to elevated lumpfish mortalities" but reported that "no alternative solution was given". Mowi's Loch Duich salmon farm in Loch Alsh 'Special Area of Conservation' reported "significant" mortalities in lumpfish caused by [Flavivirus](#) "transferred from the supplier" ([Mowi-owned Ocean Matters in Wales](#)) in July 2021.

By contrast, Grieg Seafood's North Papa salmon farm in Shetland reported in July 2021: "Company policy has been to limit cleaner fish due to health concerns for the cleaner fish".

In view of such shocking welfare abuse, what action is the UK Government and Scottish Government taking to tackle cleaner fish mass mortalities, unnecessary suffering, the spread of infectious diseases and use of antibiotics (not to mention the ecological and genetic impacts of trans-locating cleaner fish from the wild in England, Ireland and across Scotland to on-grow on Scottish salmon farms – something [assessed by the Norwegian Scientific Committee for Food and the Environment back in 2019](#))?

Judged by previous whitewashing of welfare abuse on salmon farms by APHA (as [detailed in Scottish Salmon Watch's unanswered letter of 20 April 2021](#)), Scamon Scotland is not particularly hopeful that either the UK Government or Scottish Government will close the net on systematic welfare abuse on salmon farms across Scotland. Perhaps it will take legal action to force welfare laws to be followed?

Back in April 2021, Scottish Salmon Watch presented evidence of endemic welfare abuse on salmon farms in a letter to your honourable self. This letter (re-enclosed below and available [online here](#)) has still not received a reply. A swift reply to this letter and last April's letter would be much appreciated.

Scottish Salmon Watch's [letter dated 20 April 2021](#) cited a dossier – "[Appalling Pathetic Horrific Abject \(PHA\) – Failing Fish Welfare Since 2013!](#)" (April 2020) - including:

APHA reported internally in January 2017:

The fish visits have not happened for 2016/17 but are scheduled for February. I am concerned about resource and the wisdom of organising fish farm visits, I would actually favour pushing these back to the late spring or summer - but would not want to send the message that we are not delivering for SG because of resource going to help the [REDACTED] in England.

In July 2018, Scottish Salmon Watch wrote to APHA:

"Scottish Salmon Watch understands that it is APHA not Marine Scotland who is the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. As [Scottish Salmon Watch's letter dated 13 July 2018](#) cited:

[A letter from Jill Barber, Aquaculture Health, Welfare and Innovation Manager, at the Scottish Government dated 9 July 2018](#) also identifies the [Animal and Plant Health Agency \(APHA\)](#) as the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006:

Fish Health Inspectors will report any significant case of poor welfare to Animal and Plant Health Agency (APHA) veterinarians, responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. If APHA suspect that an offence may have been committed under the Act, there are various enforcement options including issuing advice, warning letters and care notices, and the option of passing evidence for a potential prosecution to the Procurator Fiscal to consider.

Scottish Salmon Watch's [letter to APHA and Police Scotland dated 13 July 2018](#) (copied to Scottish Ministers who are also copied into this letter) cited '[Case Information](#)' published by the [Scottish Government's Fish Health Inspectorate](#) and [photographs obtained via Freedom of Information](#) which provided graphic evidence of welfare abuse on salmon farms across Scotland.

Scottish Salmon Watch asked in September 2019 via "[Welfare Abuse at Scottish Salmon Farms - Why No Legal Enforcement Or Prosecutions?](#)":

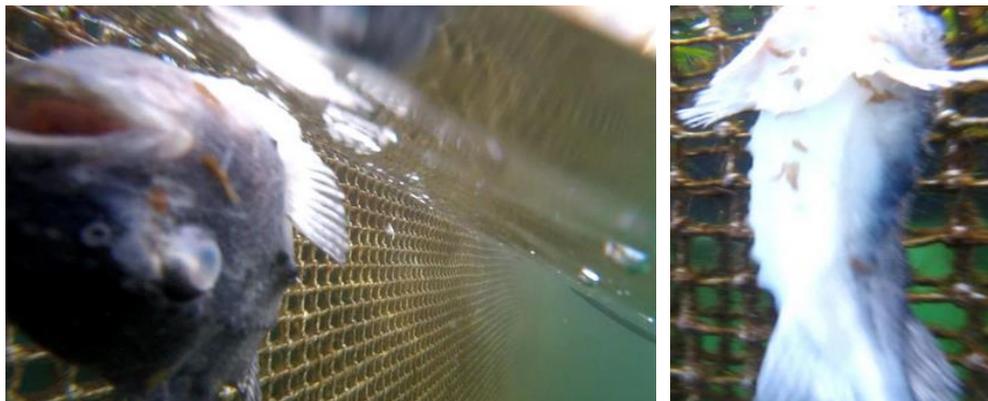
"The weight of evidence recording widespread welfare abuse on Scottish salmon farms is surely now so overwhelming to bring legal action for systematic breaches of the [Animal Health & Welfare \(Scotland\) Act 2006](#)?..... Yet the 'competent' authorities with responsibility for animal welfare - in the shape of Scottish Ministers, the Animal & Plant Health Agency, the SSPCA and Police Scotland's Wildlife Crime Unit - are turning a [blind eye](#) to systematic and shocking welfare abuse on salmon farms. Raising complaints feels like banging your head against a brick wall."

Scottish Salmon Watch asked again in October 2020: "[Ongoing Welfare Abuse & Unnecessary Suffering on Salmon Farms - Why No Prosecutions?](#)"



It is painfully clear that the answer largely lies with APHA's abject failure to inspect salmon farms – both quantitatively and qualitatively. Scottish Salmon Watch firmly believes that APHA is guilty of failing to follow its statutory duties via the [Animal Health and Welfare \(Scotland\) Act 2006](#).

Finally, Scamon Scotland asks the UK Government to uphold welfare laws in relation to both salmon and cleaner fish. You do not need to be a rocket scientist to see the obvious mortality, unnecessary suffering and endemic welfare problems in cleaner fish as well as farmed salmon.





If 60% of the sheep in a field were dying with their dead carcasses rotting all along the fence line or 60% of cows grazing in a pasture were dying horrible deaths with their legs up in the air then the general public would be quite rightly horrified and would boycott British lamb and British beef.



Yet why is the torture of fish – [shown by scientific research to be a sentient being capable of suffering and feeling pain](#) – deemed to be a necessary evil to justify the expansion of [toxic salmon farming](#) (especially [Norwegian behemoth Mowi](#)) in Scotland?



How can the UK Government promote the consumption of Scottish farmed salmon when the scale of unnecessary suffering of cleaner fish and salmon is so horrific and stomach-churning?



Damning [video evidence](#) shows that salmon farming is ethically and environmentally bankrupt.



Scamon Scotland advocates that consumers should boycott Scottish salmon. Salmon farming in Scotland – [ca. 80% of which is controlled by Norwegian salmoney including the Norwegian Government](#) – is a dirty rotten industry which desperately needs to clean up its act. Inside Scottish Salmon Feedlots [reported in March 2021](#):



“You don't need to be an animal rights activist to know this is wrong,” said Corin Smith. “Cleaner fish are Scotland's salmon farm shame and a stain on our reputation. There is perhaps no other issue in open cage salmon farming that summarises all that is wrong with it. The use of one sentient animal as a disposable treatment, to solve the problems created by intensive factory farming of another sentient animal. Simply because they are cheaper to use than mechanised treatments.”



Shamefully, it seems that the Scottish Government has passed the bureaucratic buck onto APHA and the UK Government.



Don Staniford
@TheGAAIA



Why is @scotgov turning a blind eye to welfare abuse of 'cleaner fish' on salmon farms? @ScotlandSalmon @MowiScotlandLtd @salmon_scottish @scotseafarms tinyurl.com/3vb39yvm

Please end the welfare nightmare!
@scotgp @ciwf @PETAUK @HSIGlobal
@Animallawyersuk @onekindtweet



 Mairi Gougeon and 9 others

10:19 AM · Feb 1, 2022 · Twitter Web App

Please act now to enforce welfare laws on salmon farms for cleaner fish as well as salmon.

Yours sincerely,

Don Staniford

Director, [Scamon Scotland](https://www.scamon.scot.nhs.uk/)

Cc: Scottish Ministers: scottish.ministers@gov.scot



The Scottish Government
St. Andrew's House
Regent Road
Edinburgh
EH1 3DG

1 February 2022

Dear Scottish Ministers,

[Please Come Clean on the Dirty Trade in Wrasse & Lumpfish by Salmon Farms!](#)

In view of the lethal trade in 'cleaner fish', [Scamon Scotland](#) (formerly called Scottish Salmon Watch) calls on the Scottish Government to address the mortality, welfare and disease problem of salmon farms using wrasse (mostly caught in the wild) and lumpfish (mostly farmed).

Scamon Scotland calls on Scottish Ministers to:

- Establish a public register of shipments/imports/transfers of cleaner fish
- Record and report monthly cleaner fish mortalities
- Test for infectious diseases, pathogens and viruses in cleaner fish prior to transfer to salmon farms and during their short lives on salmon farms
- Record antibiotic use on cleaner fish



Scamon Scotland is [diametrically opposed to the use of toxic chemicals to kill sea lice infestations on salmon farms](#) but the use of 'cleaner fish' is certainly not an ecologically or welfare friendly alternative. If salmon farming cannot operate without lice infestations and mass mortalities – in both farmed salmon and 'cleaner fish' – then it has clearly lost its environmental, welfare and social license. Scottish salmon's dirty trade in cleaner fish must stop now!

Current practices – as [showcased via ‘Case Information’ published by the Scottish Government’s Fish Health Inspectorate](#) - raise serious concerns about mortality and welfare of cleaner fish:

Cleaner fish 'Case Information' published by the Fish Health Inspectorate in 2021								
Date	Company	Site	Species	# on site	Mort #s	% Mortality	% stocking	Details recorded by FHI 'Case Information'
Oct	Scottish Sea Farms	Toyness	Wrasse	5,953	5,765	47	6	First cycle of stocking wild caught wrasse (12,187 input in Sept 2021)
Oct	Mowi	North Shore	Both	149,728	117,414	49	46	234,028 lumpfish from Ocean Matters in Wales & 63,668 wild wrasse
Oct	Mowi	Tabhaigh	Both	67,650			12	Farmed lumpfish and wild caught wrasse on site
Oct	The Scottish Salmon Co	Druimyeon Bay	Lumpfish	50,000			14	Lumpfish on site from Ocean Matters
Oct	The Scottish Salmon Co	Portree	Lumpfish	90,980		12.4		Lumpfish (Ocean Matters) morts "attributed to general background losses"
Oct	The Scottish Salmon Co	East Tarbert Bay	Lumpfish	70,000			17	Lumpfish from Ocean Matters & Otter Ferry
Oct	Scottish Sea Farms	Westerbister						"Site to stock wrasse (local wild caught from Orkney) to help combat rising sea lice levels"
Sept	Mowi	Caolas a Deas	Both	90,720	53,596		100	Morts in lumpfish due to sea lice treatment (freshwater) & Tenacibaculum
Sept	Scottish Sea Farms	Scallastle Bay	Wrasse	16,705			3	Ballan wrasse caught from the wild; hoping to get lumpfish
Aug	Mowi	Invasion Bay	Both	135,046	4,971		24	Lumpfish morts due to "emancipation", Pseudomonas, wounds & fin damage
Aug	Mowi	Camas Glas	Both	79,506	16,323		12	Morts due to decomposition, wounds, fin damage & culling
July	The Scottish Salmon Co	West Strome	Lumpfish	61,013			12	Lumpfish from Otter Ferry & Swansea University
July	Mowi	Ardintoul	Lumpfish	216,733	48,499	22.3	12	Florfenicol (antibiotic) treatment for Pseudomonas infection in lumpfish
July	Mowi	Duich	Both	48,409	27,000	37	7	Lumpfish morts "attributed to a Flavivirus infection that was transferred from the supplier" (Ocean Matters); wild caught wrasse from Skye & Weymouth
July	The Scottish Salmon Co	Sgian Dubh	Wrasse	27,000			3	Wild wrasse
June	Mowi	Ornish Island	Lumpfish	19,072	2,612	5.13	5	Lumpfish came from Ocean Matters in May 2021
June	Loch Duart	Calva Bay	Wrasse	1,400			0.3	
June	The Scottish Salmon	Gometra	Both	37,121	43,945		11	Issues with "black loss" (less fish retrieved at end of cycle than expected) "Mortality is not being identified when cleaner fish stick to sides of pen and don't end up in mort basket before rotting away"
June	The Scottish Salmon	Geasgill	Lumpfish	90,711	1,414		12	"Black loss" with cleaner fish described as "most vulnerable to bad weather"
June	The Scottish Salmon	Vuia Mor	Lumpfish	51,749			11	
June	The Scottish Salmon	Kyles of Vuia	Lumpfish	46,838			9	
June	The Scottish Salmon	Gravir	Both	66,294			8	Morts "above expected since input"; "company not 100% sure of the cause"
June	Scottish Sea Farms	Fada	Wrasse					"Wrasse brought over from Ireland during last cycle"
June	The Scottish Salmon	Taranaish	Both					"Locally caught wrasse later in the summer & lumpfish in the autumn/winter"
June	Scottish Sea Farms	Nevis A	Both	45,900	2,353		31	"Elevated mortalities...related to treatments & some higher sea temperatures"
June	Scottish Sea Farms	Nevis C	Both	7,732	2,632		12	Lumpfish "imported from Ireland for this cycle (2020), not planning to do this in the future"; Morts due to increased water temperatures
May	The Scottish Salmon	Druimyeon Bay	Lumpfish	65,611	1,340	2	10	
May	The Scottish Salmon	East Tarbert Bay	Lumpfish	88,114	2,061		11	0.88% weekly mortality of lumpfish in Week 19 of 2021
May	Mowi	Poll na Gille	Both	79,612		30 & 13	13	Wild wrasse "caught around Mull, Loch Melfort & some were imported from Ireland (not since last inspection)"; 30% lumpfish & 13% wrasse mortality
May	Mowi	Bagh Dail Nan Ceann	Both	170,833		4.4 & 1.2	43	"Very few wrasse observed"; 4.4% lumpfish & 1.2% wrasse mortality
May	Kames Fish Farming	SW Shuna	Lumpfish	88,000		7.2	16	Lumpfish (from Otter Ferry) mortality "attributed to handling"
May	Mowi	Harport	Both	34,463			13	Farmed & wild Ballan wrasse, wild Corkwing wrasse & lumpfish; "Cages stocked with wild wrasse reported to have had fewer sea lice interventions"
May	Mowi	Scalpay	Both	54,000			13	
May	Scottish Sea Farms	Speive	Wrasse	8,792			2	Wild caught wrasse from West coast of Scotland
April	Scottish Sea Farms	Kempie Bay	Lumpfish	13,696			12	"Movement of lumpfish from out with GB (sic) onto site from Bantry at end of 2020. Health certificates inspected on site"
April	Scottish Sea Farms	Sian Bay	Lumpfish	31,845			12	Same details as Kempie Bay case above
April	Scottish Sea Farms	Shuna	Both	11,525			16	Wild wrasse from West coast of Scotland & lumpfish from Republic of Ireland
April	Mowi	Kingairloch	Both	30,731	3,594		13	Wrasse "left over from last cycle, with risk assessment"; Lumpfish "increased mortality due to freshwater treatments...try to remove cleaner fish prior to treatments"

Of the 38 cases identified above, 333,519 morts (both wrasse and lumpfish) were reported but only 15 cases provided any information on mortality at all. Mortality rates reported ranged from 49% (at Mowi's North Shore salmon farm in Loch Erisort) to 1.2% at Mowi's Bagh Dail Nan

Cean ('Bay of the Dead Heads') salmon farm in the Sound of Jura although only 10 sites reported % mortality and it was often not clear if this was reported as weekly, monthly or total mortality.

The Scottish Salmon Company referred to "black loss" (less fish retrieved at end of cycle than expected) with a report from Gometra salmon farm in June 2021 detailing: "Mortality is not being identified when cleaner fish stick to sides of pen and don't end up in mort basket before rotting away" (see later in this letter for more case details).

Assessing total mortality of cleaner fish on salmon farms in Scotland is currently impossible given the lack of data. A report [published by the Nordic Council of Ministers in December 2021](#) cited a recent study by the Norwegian Food Safety Authority which revealed that salmon farmers reported a mortality rate of around 40% but that the real mortality rate was closer to 60% (see at the end of this letter for more details). If the mortality rate of cleaner fish on salmon farms in Scotland is anything like 40-60% then millions of wrasse and lumpfish could be dying horrible deaths.

Data on cleaner fish stocked on site was more comprehensive with 35 out of 38 cases reported via the Fish Health Inspectorate in 2021 detailing numbers and a total of 2.2 million cleaner fish (wrasse and lumpfish) reported. Around half the sites identified in 2021, stocked both wrasse and lumpfish (17) with some sites just stocking lumpfish (13) and wrasse (6) alongside the salmon.

In terms of cleaner fish stocking rates (the ratio of wrasse and lumpfish per salmon on the farm), one site (Mowi's Caolas a Deas salmon farm in Loch Shell in September 2021) reported even more cleaner fish (76,342 wrasse and 14,378 lumpfish) than salmon (89,452) i.e. just over 100% stocking. The Fish Health Inspectorate report ([Case 2021-0309](#)) stated that "it has been accepted by industry that freshwater treatments will lead to elevated lumpfish mortalities" but that "no alternative solution was given":

Increased Mortality in Cleanerfish:

LUM 2021: wk8, 6447 (freshwater); wk22, 8321; wk23, 7228; wk29, 5690; wk30, 11621 (extended freshwater); wk31, 10030 (extended freshwater)

Causes of mortality: sealice treatment (freshwater), tenacibaculum

It has been accepted by industry that freshwater treatments will lead to elevated lumpfish mortalities. No alternative solution was given. Site manager said that it is difficult to dewater lumpfish as a result of size and shape. Staff try to remove fish as much as possible with hand nets. Increased handling may also contribute to mortalities.

Site Details (include cleaner fish for all sections)				
Total No facilities	20		Facilities stocked	18
Species	SAL	WRS	LUM	
Age group	Q4 2020	2021	mixed	
No Fish	89,453	76,342	14,378	
Mean Fish Wt	2.5kg	mixed	mixed	

An industry norm for stocking of cleaner fish appears to be ca. 10-15% with the most cleaner fish (216,733 lumpfish) recorded on site during 2021 at Mowi's Ardintoul salmon farm in Loch Alsh. In July 2021 ([Case 2021-0273](#)) Mowi reported 48,499 mortalities of lumpfish (22.3%

mortality) since input in February (i.e. over a six month period). Another [Fish Health Inspectorate visit to Mowi's Ardintoul salmon farm in Loch Alsh in October 2019](#) published the first photos of diseased lumpfish along with details of mass mortalities and diseases ([Case-2019-0577](#)):



One salmon farm (Westerbister) inspected during 2021 reported that cleaner fish would be used in the future whilst another Scottish Sea Farms site at Fada reported "wrasse brought over from Ireland during last cycle" but failed to report any wrasse in the stocking data (or on [the import data disclosed last month by the Scottish Government](#) – see later in this letter for more details).

Other sites (not recorded in the table above) reported zero cleaner fish in the stocking information (e.g. Cooke Aquaculture) and data is still missing for the whole of December and over a dozen cases in September, October and November are still recorded [by the Fish Health Inspectorate as "awaiting publication"](#).

It is difficult to gauge the total use of cleaner fish at salmon farms across Scotland as the Fish Health Inspectorate does not visit every salmon farm each year and the 38 cases detailed in the table above may only represent ca. a quarter of all sites. The Scottish Government's 'Scottish Fish Farm Production Survey 2020' [published in September 2021](#) (the latest publicly available data) records 232 salmon farms in Scotland in 2020 but 101 reported zero production (i.e. only 131 were active).

Fish Farming Expert [reported back in 2016](#) that Marine Harvest ([renamed Mowi in 2019 due to "negative consumer perception"](#)) "intends to stock 2.5 million cleaner fish – split 50/50 between wrasse and lumpfish, the former work better in summer and the latter in winter".

Since Mowi accounts for ca. a third of all salmon farming production - Mowi [claims to produce 68,000 tonnes of farmed salmon annually in Scotland](#) and the latest Scottish Government data reported 192,129 tonnes of farmed salmon production in 2020 with 232,000 tonnes forecast for 2021 - the number of cleaner fish used in salmon farms in Scotland could be well over 7 million (a [report published by the Marine Conservation Society in February 2021 said demand for cleaner fish – mostly lumpfish - on salmon farms in Scotland was an estimated 10 million](#)).

The [Mowi-owned lumpfish farming facility at Ocean Matters in Wales reported](#) "it produced over 2 million cleaner fish during 2019". However, it is not known how many of these farmed lumpfish die each year on salmon farms in Scotland or what the cleaner fish are dying from.

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in July 2021](#) details "significant" mortalities in lumpfish caused by Flavivirus at Mowi's Loch Duich salmon farm with 37% mortality (27,000 dead lumpfish) since input in May 2021 ([Case 2021-0274](#), p121-124). Flavivirus infection "was transferred from the supplier" (i.e. Mowi's Ocean Matters in Wales):

Lumpfish came onto site in May from Ocean Matters and were stocked at 8%. Site suffered elevated lumpfish mortalities following transfer, which has been attributed to a Flavivirus infection that was transferred from the supplier. Total mortality since input was 37% (27,000). Site staff increased mortality removal, net cleaning and they were hand feeding the lumpfish to promote recovery. Mortality has since reduced.

Wrasse on site were wildcaught in the waters around Skye and Weymouth. Wrasse are being transferred to the site as and when they are available from the supplier. Stocking began 2 weeks ago and the site manager stated that the site will continue to receive wrasse until they reach a stocking density of 2%. Wrasse mortality since input is 1%.

Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in June 2021](#) details "black loss" mortality problems in cleaner fish at The Scottish Salmon Company's Gometra salmon farm off the Isle of Mull ([Case 2021-0192](#), p37-9):

Issues with black loss (less fish retrieved at end of cycle or grade than expected) at end of cycle with cleaner fish. Site manager suspects that mortality is not being identified where cleaner fish stick to sides of pen and don't end up in mort basket before rotting away. Site manager mentioned that efforts are being made to reduce black loss. Site are trialling new and different hide set ups and increasing the amount of hide available to Cleanerfish. This will help provide sanctuary during rough weather as well as reduce stress.

Cleanerfish mortality (last 4 weeks)

Week 19 - Wrasse - 8 - Lumpsucker - 11

Week 20 - Wrasse - 6 - Lumpsucker - 10

week 21 - Wrasse -2 Lumpsucker 2

Week 22 - Wrasse - 9 - Lumpsucker -6

Cleanerfish mortality picked up during regular mortality removal is generally low, however there is issue with black loss during grades and harvests. (see details below)

Wrasse Black loss recorded as mortality - Picked up during grading in week 16 2021 - 10995 mixed species and 8807 Ballan

Lumpsucker Black loss from movements off site - week 35 9770 and week 36 3398

2020 weeks 13 , 17 and 18 - 4146, 4464 and 2365 - Lumpsucker Black loss from end of cycle harvesting.

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in July 2021](#) details no cleaner fish at Grieg Seafood's North Papa salmon farm (other cases involving Cooke Aquaculture also reported no cleaner fish) and states that "Company policy has been to limit cleaner fish due to health concerns for the cleaner fish" ([Case 2021-0226](#), p99-101):

Case No:	2021-0226	Date of visit:	21/07/2021
Time spent on site:	3 hours	Main Inspector:	
Site No:	FS0515	Site Name:	North Papa
Business No:	FB0440	Business Name:	Grieg Seafood Shetland Ltd

Company policy has been to limit cleaner fish use due to health concerns for the cleanerfish.

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in April 2021](#) details wrasse "left over from last cycle, with risk assessment" at Mowi's Kingairloch salmon farm ([Cases 2021-0058](#), p1-3). Mortality records detailed 3,594 lumpfish morts since input with "increased mortality due to freshwater treatments" and the note that the farm "try to remove cleaner fish prior to treatments" (freshwater and mechanical treatments can kill cleaner fish):

Time spent on site: Main Inspector:

Site No: Site Name:
 Business No: Business Name:

Case Types: 1 2 3 4 5 6

Water Temp (°C): Thermometer No: FHI 045 completed

Observations: Region: HI Water type: S CoGP MA: M-36

Dead/weak/abnormally behaving fish present? If yes, see additional information/clinical score sheet.

WRS left over from last cycle, with risk assessment. New input of lumpfish for current stock. Risk assessment for SAL movement from Port na Cro to Kingairloch inspected. Movement required due to biomass.

Site Details (include cleaner fish for all sections)

Total No facilities	<input type="text" value="8"/>		Facilities stocked	<input type="text" value="7"/>	
Species	SAL	LUM	WRS		
Age group	2020 Q2	2020	wild, mixed		
No Fish	238,000	24,805	5,926		
Mean Fish Wt	3.4kg	25-30g	85g		

Mortality Records

1. Mortality records available for inspection? Y

2. How are mortalities disposed of?
 If other detail:

3. Mortality records complete and correctly entered? Y

4. Recent mortality (last 4 wks):

5. Evidence of recent increased/atypical mortalities? N
 If yes, facility nos/no mortality per facility/no stock per facility/reason:

6. Any other peaks in mortality during period checked? Y
 If yes, detail:

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in June 2021](#) at the Fada salmon farm operated by Scottish Sea Farms in the Summer Isles refers to wrasse imported from Ireland but does not record any wrasse or lumpfish in the stocking data or any mortalities ([Case 2021-0166](#)) and there are no import shipments for Scottish Sea Farms [disclosed in the trade data provided by the Scottish Government on 10 January 2022](#):

Case No:	2021-0166	Date of visit:	01/06/2021
Time spent on site:	3.5h	Main Inspector:	
Site No:	FS0858	Site Name:	Fada
Business No:	FB0125	Business Name:	Scottish Sea Farms Ltd

Wrasse brought over from Ireland during last cycle.

Site Details (include cleaner fish for all sections)				
Total No facilities	6	Facilities stocked	6	
Species	SAL			
Age group	2021S1			
No Fish	149,035			
Mean Fish Wt	200g			

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in June 2021](#) detailed lumpfish “imported from Ireland for this cycle (2020), not planning to do this in the future” ([Case 2021-0183](#), p87-9).

Case No:	2021-0183	Date of visit:	09/06/2021
Time spent on site:	2.5 hrs	Main Inspector:	
Site No:	FS0546	Site Name:	Nevis C (Ardintigh)
Business No:	FB0125	Business Name:	Scottish Sea Farms Ltd

LUM imported from Ireland for this cycle (2020), not planning to do this in the future

Cleaner fish observed on site, salmon deeper in the pens and at times challenging light conditions resulting in decreased visibility. No moribund or lethargic fish observed. Fish sampled for VMD appeared healthy and in good condition.

Cleaner fish mortality records: Mortality in last 4 weeks between 51-83 per week for the entire site for both wrasse and lumpfish. Increase in mortality from wk 29 2020 until week 41 2020 with a peak in mortality in wk 35 2020 at 2,364 morts. Largely mortalities are attributed to treatments for lice and AGD. Some mortalities of lumpfish believed to be attributed to increased water temperatures.

Database entry records mortalities by different species but exports from the database don't reflect this. Company who provided the database is currently working on improving this.

Site Details (include cleaner fish for all sections)				
Total No facilities	12	Facilities stocked	3	
Species	SAL	LUM	WRS	
Age group	2019 Q4	2020	Wild	
No Fish	62,974	4,732	3,000	
Mean Fish Wt	6.7kg	80-250g	Mixed	

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in April 2021](#) detailed movement (i.e. import) of lumpfish from Bantry in Ireland with “health certificates inspected on site”(although this import does not show up in [FOI data disclosed by the Scottish Government last month](#)) to a salmon farm operated by Scottish Sea Farms in Kempie Bay in Loch Eriboll ([Case 2021-0083](#), p1-3):

Case No:	2021-0083	Date of visit:	27/04/2021
Time spent on site:	4 hours	Main Inspector:	
Site No:	FS0359	Site Name:	Kempie Bay
Business No:	FB0125	Business Name:	Scottish Sea Farms Ltd

Movement of Lumpfish from out width GB onto site from Bantry at end of 2020. Health certificates inspected on site.

Case No:	2021-0083	Site No:	FS0359
Date of Visit:	27/04/2021	Inspector(s):	
Registration/Authorisation Details			
1. Business/site details summary checked by site representative?			
2. Changes made to details?			
Site Details (include cleaner fish for all sections)			
Total No facilities	6	Facilities stocked	6
Species	SAL	LUMP	
Age group	2020 S1's	2020	
No Fish	109,582	13,696	
Mean Fish Wt	3.5kg	30g	

Another [Scottish Government inspection in May 2021](#) of a salmon farm operated by Scottish Sea Farms at nearby Sian Bay also in Loch Eriboll detailed movement of lumpfish from outside Great Britain from Bantry in Ireland at the end of 2020 with “health certificates inspected on site” ([Case 2021-0083](#), p15-17) even though this import did not show up in [FOI data disclosed last month by the Scottish Government](#):

Case No:	2021-0087	Date of visit:	27/04/2021
Time spent on site:	4 hours	Main Inspector:	
Site No:	FS0361	Site Name:	Sian Bay
Business No:	FB0125	Business Name:	Scottish Sea Farms Ltd

Movement of Lumpfish from out with GB onto site from Bantry at end of 2020. Health certificates inspected on site.

Site Details (include cleaner fish for all sections)				
Total No facilities	10	Facilities stocked	10	
Species	SAL	LUMP		
Age group	2020 S1's	20/21		
No Fish	254,939	31,845		
Mean Fish Wt	3.3kg	30g		

Another [Scottish Government inspection in May 2021](#) of a salmon farm operated by Scottish Sea Farms at Shuna in Loch Linnhe detailed wild wrasse from the West coast of Scotland and lumpsuckers imported from the Republic of Ireland (ROI) in 2020 ([Case 2021-0078](#), p1-3):

Case No:	2021-0078	Date of visit:	28/04/2021
Time spent on site:	4 hours	Main Inspector:	
Site No:	FS0695	Site Name:	Shuna
Business No:	FB0125	Business Name:	Scottish Sea Farms Ltd

wrasse wild - West coast Scotland Lump on in 2020-ROI

Site Details (include cleaner fish for all sections)				
Total No facilities	10	Facilities stocked	5	
Species	sal	lump	wrasse	
Age group	2020 S1	adult	adult	
No Fish	71,261	7,688	3,837	
Mean Fish Wt	5.6	400g	200g	

The import of wild caught wrasse from Ireland (both Northern Ireland and the Republic of Ireland) was red flagged by a [FOI disclosure last month by the Scottish Government](#):



Why is JJ O'Neill in Dunloy permitted @scotgov @daera_ni @DefraGovUK to export 275,678 wrasse from Northern Ireland to salmon farms in Scotland? @MowiScotlandLtd @kamesfishfarm tinyurl.com /yb66hzvk @salmonwatchire @NSFAS_Ireland @sliabhaliag @AfloatMagazine @nifpo @anifpo

Date consignment due	Destination site name	Destination business name (Site operator)	Species	Stage	Number	Source Country	Import consignor	Import Site of Origin
15/08/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	9,485	Northern Ireland	JJ O'Neill	Dunloy
12/10/2020	Bagh Dall Nan Ceann	Mowi Scotland Ltd	WRS	MVG	8,182	Northern Ireland	JJ O'Neill	Dunloy
23/08/2021	Ardintoul	Mowi Scotland Ltd	WRS	MVG	8,010	Northern Ireland	JJ O'Neill	Dunloy
25/08/2021	Ardintoul	Mowi Scotland Ltd	WRS	MVG	8,000	Northern Ireland	JJ O'Neill	Dunloy
05/10/2020	Bagh Dall Nan Ceann	Mowi Scotland Ltd	WRS	MVG	7,535	Northern Ireland	JJ O'Neill	Dunloy
14/09/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	7,465	Northern Ireland	JJ O'Neill	Dunloy
09/08/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	7,390	Northern Ireland	JJ O'Neill	Dunloy
27/09/2021	Bagh Dall Nan Ceann	Mowi Scotland Ltd	WRS	MVG	6,950	Northern Ireland	JJ O'Neill	Dunloy
19/07/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	6,525	Northern Ireland	JJ O'Neill	Dunloy
21/06/2021	Carnas Glas	Mowi Scotland Ltd	WRS	MVG	6,416	Northern Ireland	JJ O'Neill	Dunloy
06/09/2021	Bagh Dall Nan Ceann	Mowi Scotland Ltd	WRS	MVG	6,320	Northern Ireland	JJ O'Neill	Dunloy
19/09/2021	Bagh Dall Nan Ceann	Mowi Scotland Ltd	WRS	MVG	6,264	Northern Ireland	JJ O'Neill	Dunloy
13/09/2021	Bagh Dall Nan Ceann	Mowi Scotland Ltd	WRS	MVG	6,183	Northern Ireland	JJ O'Neill	Dunloy
18/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	6,025	Northern Ireland	JJ O'Neill	Dunloy
03/10/2021	Gorsten	Mowi Scotland Ltd	WRS	MVG	5,980	Northern Ireland	JJ O'Neill	Dunloy
08/08/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,960	Northern Ireland	JJ O'Neill	Dunloy
25/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,739	Northern Ireland	JJ O'Neill	Dunloy
22/08/2021	Ardintoul	Mowi Scotland Ltd	WRS	MVG	5,500	Northern Ireland	JJ O'Neill	Dunloy
26/07/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	5,420	Northern Ireland	JJ O'Neill	Dunloy
04/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,251	Northern Ireland	JJ O'Neill	Dunloy
02/08/2020	Loch Leven (1)	Mowi Scotland Ltd	WRS	MVG	5,121	Northern Ireland	JJ O'Neill	Dunloy
11/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,064	Northern Ireland	JJ O'Neill	Dunloy
29/08/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,903	Northern Ireland	JJ O'Neill	Dunloy
21/09/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	4,840	Northern Ireland	JJ O'Neill	Dunloy
18/10/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,750	Northern Ireland	JJ O'Neill	Dunloy
17/10/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,735	Northern Ireland	JJ O'Neill	Dunloy
01/08/2021	Invasion Bay	Mowi Scotland Ltd	WRS	MVG	4,680	Northern Ireland	JJ O'Neill	Dunloy
13/06/2021	Kingarloch	Mowi Scotland Ltd	WRS	MVG	4,615	Northern Ireland	JJ O'Neill	Dunloy
12/07/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	4,330	Northern Ireland	JJ O'Neill	Dunloy
30/08/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,220	Northern Ireland	JJ O'Neill	Dunloy
16/11/2020	Port Na Cro	Mowi Scotland Ltd	WRS	MVG	4,208	Northern Ireland	JJ O'Neill	Dunloy
06/06/2021	Invasion Bay	Mowi Scotland Ltd	WRS	MVG	4,173	Northern Ireland	JJ O'Neill	Dunloy
07/08/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	4,146	Northern Ireland	JJ O'Neill	Dunloy

Mairi Gougeon and 9 others

12:49 PM · Jan 14, 2022 · Twitter Web App

The Department of Agriculture, Environment and Rural Affairs in Northern Ireland told Scottish Salmon Watch last month:

From: **Smith, Patrick** <Patrick.Smith@daera-ni.gov.uk>
 Date: Tue, Jan 25, 2022 at 5:05 PM
 Subject: RE: Wrasse exports from NI to Mowi Scotland
 To: Don Staniford <salmonfarmingkills@gmail.com>
 Cc: Lyttle, Owen <Owen.Lyttle@daera-ni.gov.uk>, McCaughan, Mark <Mark.McCaughan@daera-ni.gov.uk>, Campbell, Paddy <Paddy.Campbell@daera-ni.gov.uk>, Hayes, Jim <Jim.Hayes@daera-ni.gov.uk>, Watts, Jim <Jim.Watts@daera-ni.gov.uk>, Kane, John (DAERA) John.Kane@daera-ni.gov.uk

Mr Staniford,

I refer to your email of 14 January 2022 on the subject of wrasse movements from Northern Ireland to Scotland.

In regard to export certificates or environmental/disease risk assessments, the Department of Agriculture, Environment and Rural Affairs (DAERA) inspects and certifies all movements of

live fish (including wrasse) from Northern Ireland. This is a legislative requirement under aquatic animal health regulations.

All movements of live wrasse from Northern Ireland are consigned to salmon farming organisations in Scotland. DAERA has not yet carried out an assessment of the impact of wrasse harvesting but has continued to record the number of exports to inform any future assessment. At this time, the Department has not considered any formal consultation on the wrasse fishery in Northern Ireland.

Regards

Patrick Smith | Marine and Fisheries Division | Sea Fisheries Policy Branch | Department of Agriculture, Environment and Rural Affairs | Rathkeltair House | Market Street | Downpatrick | Co Down | BT30 6AJ

Contact: Tel: +44 (0)28 44618111

Email: patrick.smith@daera-ni.gov.uk

A letter from the Department of Agriculture, Environment and Rural Affairs in Northern Ireland dated 20 January 2022 confirmed the above information:

Environment, Marine & Fisheries Group
Marine & Fisheries Division



Our reference: AE1/22/56667

Mr Jim Haughey

jim_haughey@yahoo.co.uk

1st Floor
Klondyke Building
Cromac Avenue
Belfast
BT7 2AJ

Telephone: 028 90 569593

Email: owen.lyttle@daera-ni.gov.uk

Date: 20th January 2022

Dear Jim

RE: WILD CAUGHT WRASSE IN NORTHERN IRELAND

Thank you for your e-mail of 13th January 2022 regarding wild caught wrasse in Northern Ireland in which you make reference to a tweet from Don Stanniford which includes the numbers of wrasse moved to Scotland from Northern Ireland.

The commercial capture of wrasse in Northern Ireland waters is legal. DAERA is aware that wild wrasse is caught in Northern Ireland and sent as cleaner fish to salmon farming operations in Scotland. Whilst wrasse species are not subject to any quota in Northern Ireland, the movements of such live fish from Northern Ireland are regulated insofar as all movements are certified by this Department in accordance with the current aquatic animal health regulations.

Following a consultation in 2020, the Scottish Government introduced a scheme of mandatory measures involving closed seasons and landing sizes for wild wrasse. These measures are aimed at improving the sustainability of wrasse capture. They apply to anyone supplying Scottish salmon producers and this means that they apply to the NI suppliers.

Yours sincerely



**OWEN LYTTLE
DIRECTOR
MARINE & FISHERIES DIVISION**

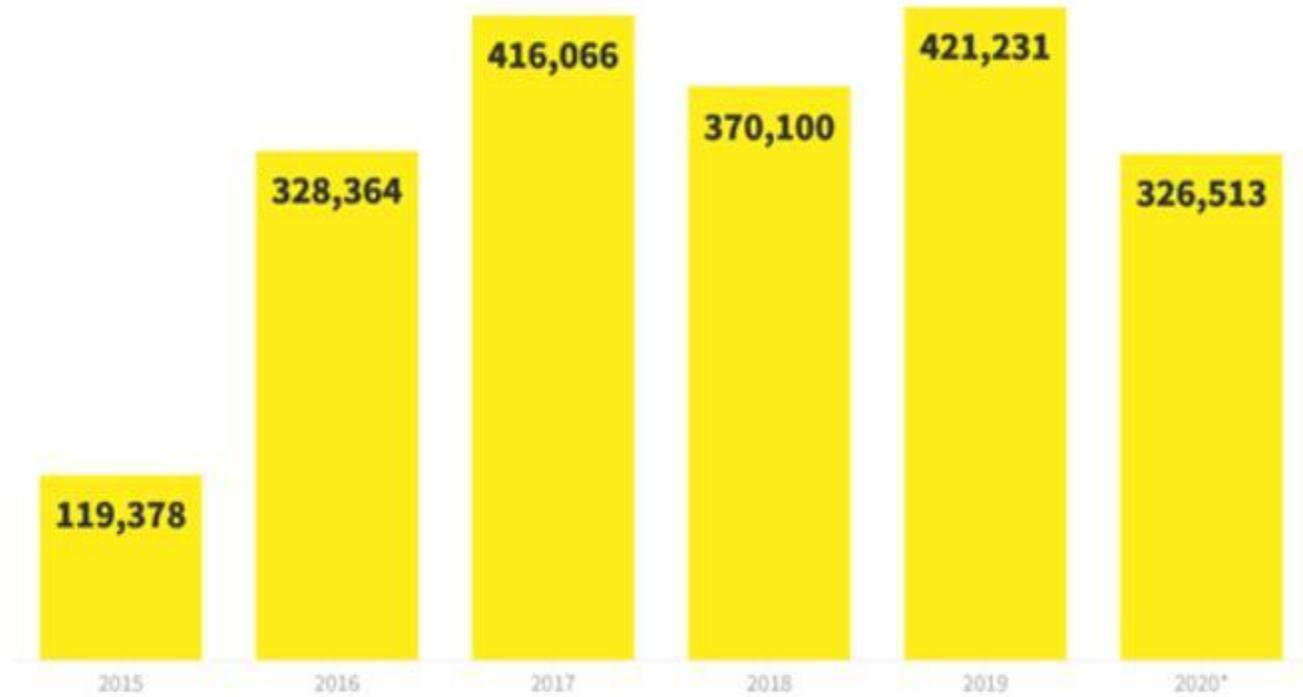
Sustainability at the heart of a living, working, active landscape valued by everyone.

If you are deaf or have a hearing difficulty you can contact the Department via the Next Generation Text Relay Service by dialling 18001 + telephone number.



Exactly how many wild caught wrasse and lumpfish are used on salmon farms in Scotland in total (including from the Republic of Ireland and England) is unclear. Data [published in June 2021 by The Journal/Noteworthy](#) details ca. 300,000 to 400,000 wild caught wrasse moved to salmon farms in Ireland each year:

N Wild Wrasse moved to Salmon Farms (2015-2020)
Vast majority were caught from the wild



Source: Marine Institute via FOI • *The 2020 figure excludes 3,540kg of wild wrasse moved to farms as the number of individual fish this may represent is unknown.

Industry data in Scotland - which is ca. ten times bigger than Irish salmon farming in terms of production - [reported 30,564 wild caught wrasse in Scottish waters in 2018](#).

Species	Undersize	Target	Oversize	Total
<i>Ballan</i>	1130	3187	573	4890
%	23.11	65.17	11.72	
<i>Corkwing</i>	2458	2306	380	5144
%	47.78	44.83	7.39	
<i>Cuckoo</i>	1107	1315	436	2858
%	38.73	46.01	15.26	
<i>Goldsinney</i>	5801	4759	104	10664
%	54.40	44.63	0.97	
<i>Rock Cook</i>	4290	2684	34	7008
%	61.21	38.30	0.49	
<i>All</i>	14786	14251	1527	30564
%	48.38	46.63	4.99	

Summary table of 2018 Scottish wild caught wrasse data, based on first 20 traps lifted each week by each boat. Click on image to enlarge. Table: SSPO.

Data for wild caught wrasse in Scottish waters in 2019 (as [published by the Scottish Salmon Producers Organisation](#)) rose to 52,645:

Number of wrasse in first 20 traps lifted weekly	Undersize	Target	Oversize	Total
Ballan				
Number	3062	7102	1747	11911
%	25.7	59.6	14.7	22.6
Corkwing				
Number	3438	4901	399	8738
%	39.3	56.1	4.6	16.6
Cuckoo				
Number	2230	2566	248	5044
%	44.2	50.9	4.9	9.6
Goldsinny				
Number	6516	7811	18	14345
%	45.4	54.5	0.1	27.2
Rock cook				
Number	6107	6481	19	12607
%	48.4	51.4	0.2	23.9
All wrasse				
Total	21353	28861	2431	52645
%	40.6	54.8	4.6	

However, data on wild caught wrasse in Scottish waters (or for that matter in England, Wales, Ireland and any other country) has not yet been published for 2020 or 2021 by Salmon Scotland (formerly SSPO) or the Scottish Government.

[FOI 2021-00259890](#) disclosed by the Scottish Government on 10 January 2022 detailed 275,678 wrasse imported from Northern Ireland to salmon farms operated by Mowi Scotland and Kames Fish Farming (although Shuna SW/ Rubh'an Trilleachain is in reality operated by Mowi not Kames) from May 2020 to November 2021. Here's the 62 import shipments from JJ O'Neill in Dunloy ranked highest to lowest ([MVG = Fish weighing more than 5 grams](#)):

Date consignment due	Destination site name	Destination business name (Site operator)	Species	Stage	Number	Source Country	Import consignor	Import Site of Origin
15/08/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	9,485	Northern Ireland	JJ O'Neill	Dunloy
12/10/2020	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	8,182	Northern Ireland	JJ O'Neill	Dunloy
23/08/2021	Ardintoul	Mowi Scotland Ltd	WRS	MVG	8,010	Northern Ireland	JJ O'Neill	Dunloy
25/08/2021	Ardintoul	Mowi Scotland Ltd	WRS	MVG	8,000	Northern Ireland	JJ O'Neill	Dunloy
05/10/2020	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	7,535	Northern Ireland	JJ O'Neill	Dunloy
14/09/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	7,465	Northern Ireland	JJ O'Neill	Dunloy
09/08/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	7,390	Northern Ireland	JJ O'Neill	Dunloy
27/09/2021	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	6,950	Northern Ireland	JJ O'Neill	Dunloy
19/07/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	6,525	Northern Ireland	JJ O'Neill	Dunloy
21/06/2021	Camas Glas	Mowi Scotland Ltd	WRS	MVG	6,416	Northern Ireland	JJ O'Neill	Dunloy
06/09/2021	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	6,320	Northern Ireland	JJ O'Neill	Dunloy
19/09/2021	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	6,264	Northern Ireland	JJ O'Neill	Dunloy
13/09/2021	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	6,183	Northern Ireland	JJ O'Neill	Dunloy
18/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	6,025	Northern Ireland	JJ O'Neill	Dunloy
03/10/2021	Gorsten	Mowi Scotland Ltd	WRS	MVG	5,980	Northern Ireland	JJ O'Neill	Dunloy
08/08/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,960	Northern Ireland	JJ O'Neill	Dunloy
25/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,739	Northern Ireland	JJ O'Neill	Dunloy
22/08/2021	Ardintoul	Mowi Scotland Ltd	WRS	MVG	5,500	Northern Ireland	JJ O'Neill	Dunloy
26/07/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	5,420	Northern Ireland	JJ O'Neill	Dunloy
04/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,251	Northern Ireland	JJ O'Neill	Dunloy
02/08/2020	Loch Leven (1)	Mowi Scotland Ltd	WRS	MVG	5,121	Northern Ireland	JJ O'Neill	Dunloy
11/07/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	5,064	Northern Ireland	JJ O'Neill	Dunloy
29/08/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,903	Northern Ireland	JJ O'Neill	
21/09/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	4,840	Northern Ireland	JJ O'Neill	Dunloy
18/10/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,750	Northern Ireland	JJ O'Neill	Dunloy
17/10/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,735	Northern Ireland	JJ O'Neill	Dunloy
01/08/2021	Invasion Bay	Mowi Scotland Ltd	WRS	MVG	4,680	Northern Ireland	JJ O'Neill	Dunloy
13/06/2021	Kingairloch	Mowi Scotland Ltd	WRS	MVG	4,615	Northern Ireland	JJ O'Neill	Dunloy
12/07/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	4,330	Northern Ireland	JJ O'Neill	Dunloy
30/08/2021	Loch Alsh (Sron)	Mowi Scotland Ltd	WRS	MVG	4,220	Northern Ireland	JJ O'Neill	Dunloy
16/11/2020	Port Na Cro	Mowi Scotland Ltd	WRS	MVG	4,208	Northern Ireland	JJ O'Neill	Dunloy
06/06/2021	Invasion Bay	Mowi Scotland Ltd	WRS	MVG	4,173	Northern Ireland	JJ O'Neill	Dunloy
07/09/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	4,145	Northern Ireland	JJ O'Neill	Dunloy
28/09/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	4,130	Northern Ireland	JJ O'Neill	Dunloy
11/10/2021	Linnhe	Mowi Scotland Ltd	WRS	MVG	4,000	Northern Ireland	JJ O'Neill	Dunloy
16/08/2020	Gorsten	Mowi Scotland Ltd	WRS	MVG	4,000	Northern Ireland	JJ O'Neill	Dunloy
05/07/2020	Loch Leven (1)	Mowi Scotland Ltd	WRS	MVG	3,921	Northern Ireland	JJ O'Neill	Dunloy
28/06/2021	MacLean's Nose	Mowi Scotland Ltd	WRS	MVG	3,902	Northern Ireland	JJ O'Neill	Dunloy
31/05/2020	Kingairloch	Mowi Scotland Ltd	WRS	MVG	3,820	Northern Ireland	JJ O'Neill	Dunloy
10/10/2021	Linnhe	Mowi Scotland Ltd	WRS	MVG	3,738	Northern Ireland	JJ O'Neill	Dunloy
17/08/2020	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	3,710	Northern Ireland	JJ O'Neill	Dunloy
02/11/2020	Poll Na Gille	Mowi Scotland Ltd	WRS	MVG	3,707	Northern Ireland	JJ O'Neill	Dunloy
09/11/2020	Port Na Cro	Mowi Scotland Ltd	WRS	MVG	3,616	Northern Ireland	JJ O'Neill	Dunloy
21/06/2020	Loch Leven (1)	Mowi Scotland Ltd	WRS	MVG	3,410	Northern Ireland	JJ O'Neill	Dunloy
03/11/2021	Loch Leven (1)	Mowi Scotland Ltd	WRS	MVG	3,086	Northern Ireland	JJ O'Neill	Dunloy

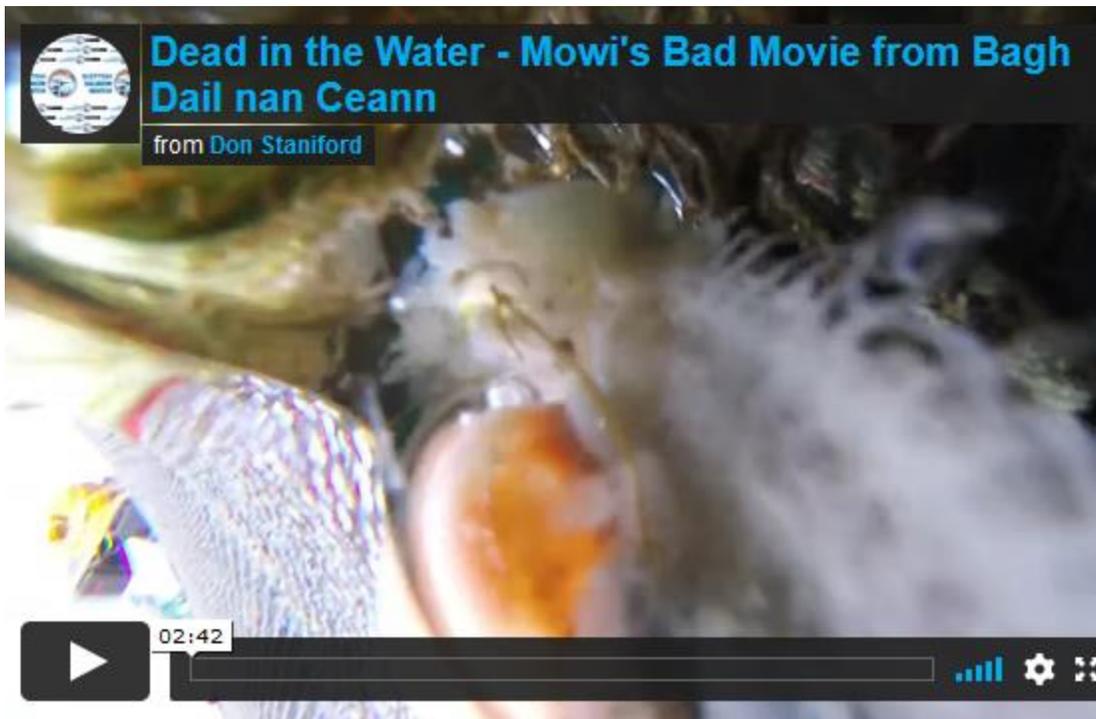
26/10/2020	Poll Na Gille	Mowi Scotland Ltd	WRS	MVG	3,060	Northern Ireland	JJ ONeill	Dunloy
28/06/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	3,010	Northern Ireland	JJ ONeill	Dunloy
30/05/2021	Invasion Bay	Mowi Scotland Ltd	WRS	MVG	2,844	Northern Ireland	JJ ONeill	Dunloy
19/10/2020	Shuna SW (Rubh'an Trill	Kames Fish Farmir	WRS	MVG	2,769	Northern Ireland	JJ ONeill	Dunloy
23/11/2020	Poll Na Gille	Mowi Scotland Ltd	WRS	MVG	2,670	Northern Ireland	JJ ONeill	Dunloy
22/11/2021	Loch Duich	Mowi Scotland Ltd	WRS	MVG	2,570	Northern Ireland	JJ ONeill	Dunloy
23/08/2020	Linnhe	Mowi Scotland Ltd	WRS	MVG	2,460	Northern Ireland	JJ ONeill	Dunloy
07/09/2020	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	2,135	Northern Ireland	JJ ONeill	Dunloy
14/09/2020	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	2,125	Northern Ireland	JJ ONeill	Dunloy
21/09/2020	Bagh Dail Nan Cean	Mowi Scotland Ltd	WRS	MVG	2,055	Northern Ireland	JJ ONeill	Dunloy
28/09/2020	Poll Na Gille	Mowi Scotland Ltd	WRS	MVG	1,985	Northern Ireland	JJ ONeill	Dunloy
29/11/2020	Poll Na Gille	Mowi Scotland Ltd	WRS	MVG	1,885	Northern Ireland	JJ ONeill	Dunloy
14/06/2020	Port Na Cro	Mowi Scotland Ltd	WRS	MVG	1,678	Northern Ireland	JJ ONeill	Dunloy
07/06/2020	Port Na Cro	Mowi Scotland Ltd	WRS	MVG	1,513	Northern Ireland	JJ ONeill	Dunloy
23/08/2020	Shuna SW (Rubh'an Trill	Kames Fish Farmir	WRS	MVG	1,510	Northern Ireland	JJ ONeill	Dunloy
14/06/2021	Camas Glas	Mowi Scotland Ltd	WRS	MVG	1,000	Northern Ireland	JJ ONeill	Dunloy
26/11/2021	Linnhe	Mowi Scotland Ltd	WRS	MVG	985	Northern Ireland	JJ ONeill	Dunloy

As detailed via the [Fish Health Inspectorate's 'Case Information' for 2021](#), there are other imports of cleaner fish from the Republic Ireland (e.g. Bantry) which appear not to have been officially reported ([something which Scottish Sea Farms has had an issue with in relation to toxic chemical use](#)).

Whatever the true figure for the use of cleaner fish on salmon farms in Scotland, it is clear in the secret filming conducted since 2018 by Scottish Salmon Watch that cleaner fish mortality is a significant problem. For example, [video footage inside a Billy Bowie skip captured evidence of mass mortalities of wrasse and lumpsuckers](#) at The Scottish Salmon Company's Toward processing and transportation facility near Dunoon in September 2020 (presumably dumped out when farmed salmon were transported for harvest):



Scottish Salmon Watch [filmed serious welfare problems in lump sucker 'cleaner fish' at RSPCA Assured Mowi's 'Bay of the Dead Heads' salmon farm in July 2019](#) – with [lump suckers dead and dying on the surface of the cage](#).



The Fish Health Inspectorate [reported in June 2019](#) for an inspection of Mowi's 'Bay of the Dead Heads' salmon farm ([Case 2019-0311](#)):

2 pens are stocked with wild mixed wrasse and the rest of pens are stocked with lumpfish.

More wrasse arriving over the summer. A consignment of wrasse was due to be received from Northern Ireland on the 30th of June. The consignment contained around 1000 wrasse. Due to the movement of wrasse on site from Northern Ireland, this will increase the surveillance frequency category from medium to high.

There was an input of wrasse during 2018. These wrasse were slowly lost to mortality throughout the year and more so through the winter months. Looking through the records of wrasse mortality there seemed to be a variety of reasons for mortality. Predation, furunculosis being the main ones. Site manager indicated that not many wrasse survived through the 2018/19 winter period.

Winter input of lumpfish into ten pens. Site manager noted that he was pleased with lumpfish survival over the winter, however they have been having issues with mortality increasing with the warmer weather and rise in sea temperature. This was visible when inspecting the pens as some fish looked very lean, and others with a clear fungal challenge. There were a few pens where this was evident, however most pens this did not seem to be an issue from the inspection. Health challenges were reported by site workers to the company vet. Who visited the site to health check the lumpfish, the vets report concluded that there was no visible health challenge with the lumpfish on site.

Another Fish Health Inspectorate report in June 2019 from Mowi's nearby Port Na Cro salmon farm ([Case 2019-0312](#)) detailed:

42000 lumpfish put in at end of 2018 - 32000 left. Lots of mortality attributed to post treatment and summer weather. Lethargic and lean lumpfish could be seen swimming round the edges of the pens. There were a lot of healthy ones too. Some had apparent issues with fungus attributed to the warmer weather. Site manager noted that they do really well in the winter months but as the sea warms up in summer they see increases in mortality and increases mortality post treatment.

Wrasse going to be stocked over the summer months. A Combination of wild and farmed - Possibly coming from Ireland, Weymouth or local fishermen. BDNC is currently being stocked with wild wrasse from NI and local areas.

Morts are ensiled off site at a pier owned by Kames. Dead fish are moved to pier using work boats rather than a waste collector, so there are no transport records, just a list of how many bins are taken to the pier periodically.

Following a [welfare complaint filed by Scottish Salmon Watch in July 2019](#), the Fish Health Inspectorate visited Mowi's 'Bay of the Dead Heads' salmon farm again [reporting in August 2019 \(Case 2019-0376\)](#):

Lump fish in all cages, wrasse in 7 cages. Cleaner fish will be recycled for a maximum of 2 cycles, if in good condition and go through a quarantine procedure. 8 week fallow period. So far, no lumpfish have been recycled.

Lumpfish from Anglesay.

Lumpfish monthly mortality = Dec 18) - 816 01) - 2,207 - 02) - 3653 03) - 1195 04) - 3007 05) - 5055 06) - 9009 07) - 26860 08) - 2781
WRA - Dec 1015 1) 781 2) 597 3)518 4)723 5)510 6)599 7)907 8) 81 Total - 41473 since January

Florfenicol treatment for lumpfish in February 2019. Mortality came down in March, but began rising again in April.

127,878 total lumpfish over cycle ~22,000 remain on site with the majority dying from unknown causes.

The company SOP says Cleaner fish mortality should be reported to cleaner fish vet when back ground mortality levels reach 0.3% background mortality per day, however it appear that few checks were carried out between May and August, even with mortality rising.

Health reports -

13/06/2019 - Health report suggests Crator disease may be a cause of mortality in lumpfish stock. Systemic bacterial infection

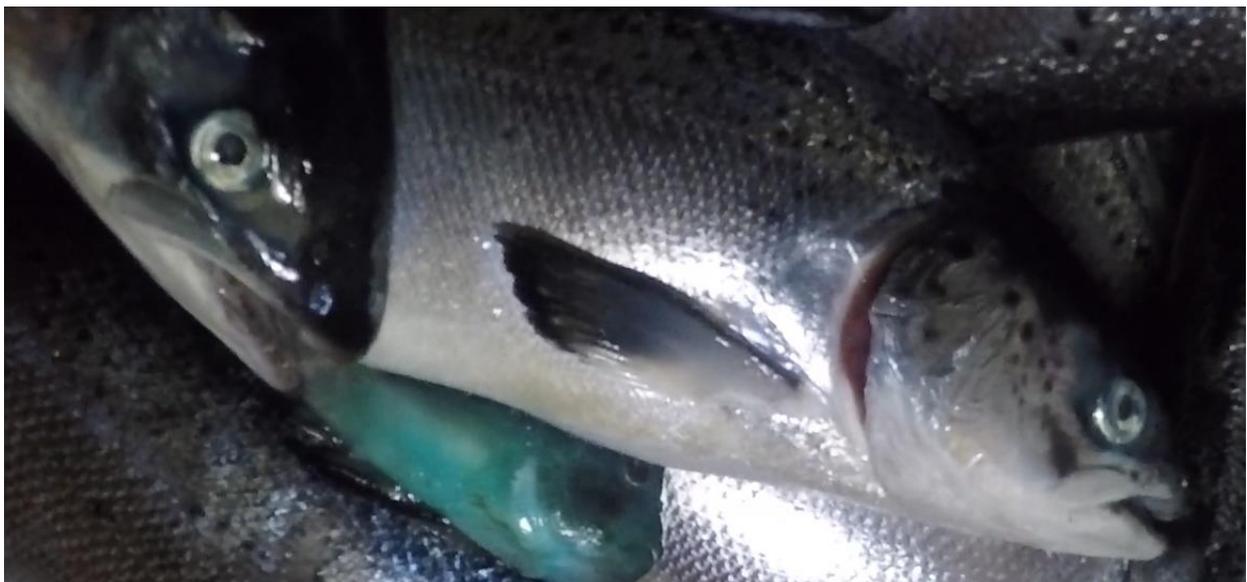
24/06 - There was a health inspection of the cleaner fish. There were signs of bacterial infection on the lumpfish with white nodules being present on the tips of spines. There was also a passive grade of the fish as well a thermolicer treatment.

31/07 - July 31st – Lumpfish have a known bacterial infection and no treatment plan is in place, as salmon are on harvest plans and starve days for treatment. However staff are removing infected lumpfish.

When Scottish Salmon Watch [visited Mowi's Loch Torridon salmon farm in November 2018](#) we found dead cleaner fish – both wrasse and lumpfish – dumped in mort bins along with diseased farmed salmon:



When Scottish Salmon Watch [visited Mowi's Sconser salmon farm on the Isle of Skye in November 2018](#) we found dead lumpfish in bins with farmed salmon:



When Scottish Salmon Watch [visited Mowi's RSPCA Assured and ASC-certified Gorsten salmon farm in Loch Linnhe in November 2018 \(as featured on Netflix's Seaspiracy\)](#) in November 2018 we discovered dozens of dead cleaner fish in a skip full of diseased salmon:



When Scottish Salmon Watch [visited The Scottish Salmon Company's salmon farm at Quarry Point in Loch Fyne in September 2018](#) the dead bodies of lumpfish littered a skip full of diseased salmon:



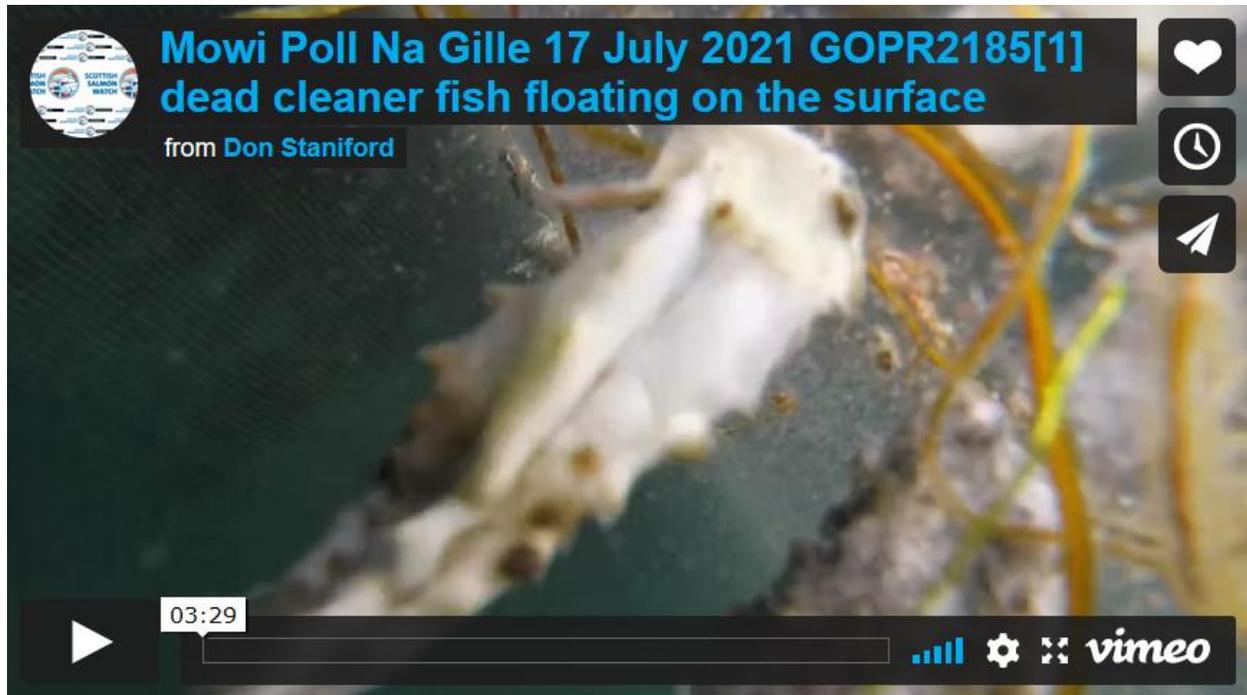
The mortality of cleaner fish was on display when Scottish Salmon Watch [visited South Shian processing plant operated by Scottish Sea Farms in Loch Creran in September 2018](#) (presumably the lumpfish are dumped out with the farmed salmon morts after processing):



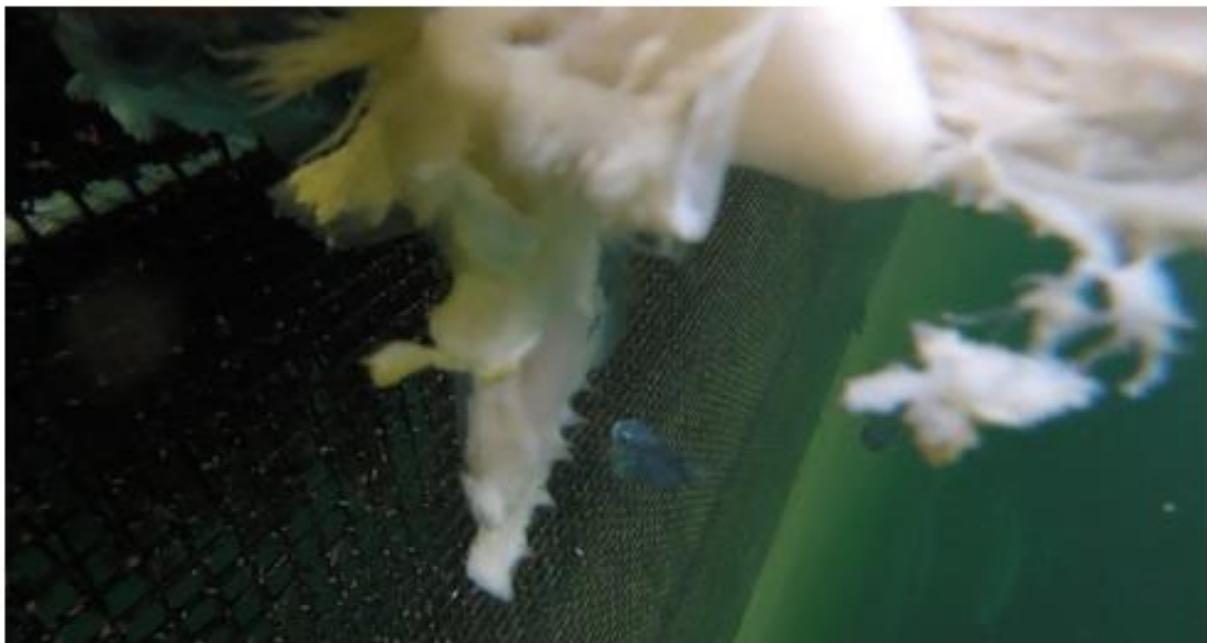
When Scottish Salmon Watch [filmed inside the Loch Spelve salmon farm operated by Scottish Sea Farms on the Isle of Mull in August 2018](#) we found lice-infested lumpfish:



In July 2021, when Scottish Salmon Watch [visited Mowi's RSPCA Assured salmon farm at Poll Na Gille in the Sound of Jura](#) (rated by OneKind as the worst salmon farm in Scotland) we found dead lumpfish on the surface of the cages and wild fish swimming inside the cages with lice-infested salmon:



As well as dead cleaner fish, [video footage shot at Mowi's Poll Na Gille salmon farm on 17 July 2021](#) shows lumpsuckers foraging near a dead farmed salmon floating on the surface of a cage:



Despite a [welfare complaint filed by Scottish Salmon Watch in July 2021](#), neither the Scottish Government's Fish Health Inspectorate nor the Animal & Plant Health Agency visited Mowi's Poll Na Gille salmon farm. When APHA did inspect Mowi's nearby 'Bay of the Dead Heads' salmon farm after a similar welfare complaint filed by Scottish Salmon Watch in July 2019, [APHA warned Mowi in a letter in September 2019 \(finally disclosed via Freedom of Information in April 2020\)](#) that they were breaking welfare laws:



Animal and Plant Health Agency
Strathearn House
Broxden Business Park
Lamberkine Drive
Perth
PH1 1RX

T 03000600704

www.gov.uk/apha

Mowi Scotland Limited

Farms Office

Glen Nevis Business Park
Fort William
PH33 6RX

16 September 2019

Dear [REDACTED]

Failure to Comply with Welfare Legislation

Animal Health and Welfare (Scotland) Act 2006

Following my visit on 2/08/19 to inspect your livestock at Marine Fin Fish farm (Atlantic Salmon) FFMC54 BDNC- Bagh Dail nan Ceann (Bay of the Dead Heads) in the Sound of Jura, in the presence of [REDACTED] (site Manager), [REDACTED] (Mowi's Area Manager), [REDACTED] (APHA VA) and [REDACTED] (FHI Marine Scotland), I must advise you that I found the following non-compliances with current welfare legislation.

Mortality in lumpfish has been a known ongoing issue, affecting the 80% of the lumpfish stocked during this production cycle at the above fish site under your responsibility.

On the day of the visit at the site (02/08/19), data provided by your staff regarding your investigation of mortality and consequential actions was not satisfactory. [REDACTED]

[REDACTED] Seeking for a health plan for lumpfish at the site at the time of the visit and further clarification regarding the health management for the investigated period, a second meeting as part of the investigation took place at APHA Perth office on Tuesday 13/08/19 with yourself, [REDACTED] (Lead Vet) and [REDACTED] (Health Manager).

During this meeting, evidence were provided of investigations and actions taken to try and minimise an increasing mortality trend in lumpfish from May 2019 until the treatment provided in between 01/07/19 to 03/07/19. After this day, there is little evidence of actions taken whilst the mortality in lumpfish continued to increase.

During the meeting on the 13/08/2019 you confirmed that a decision to humanely cull the remaining lumpfish had be taken the day before and had already started.

You have not been able to show that adequate actions were taken in the period between the 10/07/19 to the 12/08/19 in order to promote the welfare of the lumpfish under your responsibility. Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease.

This is a failing to comply with the Animal and Welfare (Scotland) Act 2006, Part 2-24 (1) and 3(e) that states that:

"a person commits an offence if the person do not take such steps as are reasonable in the circumstances to ensure that the needs of an animal for which the person is responsible are met to the extent required by good practice";

An animal's needs include *"its need to be protected from suffering, injury and disease."*

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

WF08 (Rev. 06/17)

OFFICIAL-SENSITIVE

As discussed during the onsite visit and the second meeting, it would be helpful to keep separated records for mortality and culled animal not only for salmon as you are correctly doing, but also for lumpfish and wrasse in order to have a detailed monitoring system for all species under your responsibility.

This letter is without prejudice to any further enforcement or other action, which may be taken at a later date.

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

██████████

APHA

████████████████████

Mobile: ██████████

Email Address: ██████████@apha.gov.uk

The [warning letter from APHA to Mowi dated 16 September 2019](#) ended by recommending: "it would be helpful to keep separated records for mortality and culled animal not only for salmon as you are currently doing, but also for lumpfish and wrasse in order to have a detailed monitoring system for all species under your responsibility".

The Ferret/Sunday National [reported in November 2019](#):

Mowi has **disclosed** that its Bagh Dail nan Ceann salmon farm in Loch Shuna north east of the island of Jura was visited recently by APHA inspectors. In a letter in September 2019, APHA told the company that it had failed to take "adequate actions" between 10 July and 12 August to ensure the welfare of lumpfish.



Back in December 2018, OneKind [published a damning report on the welfare of cleaner fish on salmon farms in Scotland](#) - including reference to 'Case Information' published by the Scottish Government's Fish Health Inspectorate:

Mortality rates

Mortality rates for cleaner fish on Scotland's salmon farms are not published by the industry, so it is not possible to ascertain the exact percentage of cleaner fish that survive the full salmon production cycle. Despite this, there is a suggestion that cleaner fish mortality can be high, with suggestion that it is near 100%, with the European Union Reference Laboratory for Fish Disease (2016) noting that:

"Cleaner fish mortalities in salmon farms are often high, and very few cleaner fish presumably survive through a full salmon production cycle"

Furthermore, Brooker *et al.* (2018) note that survival of cleaner fish following deployment on salmon farms can be low. Johannesen *et al.* (2018) also state that, despite the assumption that lumpsuckers

are hardy fish, mortality rates on farms can be high. In one incident in 2017 at the salmon farm North Shore, freshwater treatment for disease and sea lice, killed nearly 100% of lumpsuckers on site.

Wrasse mortality rates on salmon farms can also be high, for example Skiftesvik *et al.* (2014) note that, in Norway, there is "considerable loss of wrasses in the salmon net pens due to predation, handling, escapes and disease." Indeed, in the same study, it was found that, for one group of wrasse caught in June, mortality 35 days post-capture had reached 75%.

Fish Health Inspectorate reports also shed some light on mortality rates of cleaner fish, with the following instances being documented (Table 2).

Table 2. Cleaner fish mortalities as documented by Fish Health Inspectorate reports.

SPECIES	WHEN?	WHERE?	WHAT?
Lumpsuckers	July 2017	Seaforth	6,566 (16 %) mortality
Wrasse	July 2017	Seaforth	4,498 (12 %) mortality
Lumpsuckers	2017	Cole Deep	24,000 lumpsuckers stocked on site in Sept 2016, and now (2017) very few are left.
Lumpsuckers	April 2017	Shuna SW	High mortalities of lumpsuckers, up to 400 fish a day. Fish were treated with antibiotic for bacterial infection. No lumpsuckers left on site.
Lumpsuckers	July/August 2017	Stead of Aithness	Site stocked with lumpsuckers but these have died. This occurred shortly after the 15,000 lumpsuckers were inputted.
Cleaner fish (species not specified)	2017	Loch Alsh (Sron)	Approximately 40 % of all cleaner fish lost since input. AGD has been detected.
Lumpsuckers	Summer 2017	Raineach	Had stocked the site with lumpfish in Autumn 2015 and summer 2016, but have lost most fish.
Wrasse	December 2012	Vidlin North	Recent mortality in last weeks- 100/site/week attributed to post-treatment losses.
Wrasse	December 2012	Lismore West	Loss of 10 % of wrasse stocks since delivery in August 2012.

OneKind [concluded](#):

Collection of data

There are clear gaps in the collection of data on cleaner fish. Information on cleaner fish mortality rates, cause of mortalities, and numbers harvested from the wild are not adequately collected.

Open Seas (2017) note that information on the number of cleaner fish used by salmon farms in Scotland and the number of wild fish used, is held by salmon farms, and is available to the Scottish Government during inspections. This information should be gathered and published by the Scottish Government. Since August 2018, the Scottish Salmon Production Organisation have started publishing mortality data of farmed salmon, and this should be extended to cleaner fish too.

Scottish Ministers should also heed the warning in of a recent report - "Towards a sustainable fishery and use of cleaner fish in salmonid aquaculture: challenges and opportunities" - [published in December 2021 by the Nordic Council of Ministers](#):



"There are extensive fisheries for wrasses, and aquaculture of ballan wrasse and lumpfish," [states the Nordic Council of Ministers report](#). "Fisheries and use have evolved fast, but the development of a regulatory framework has lagged behind. Challenges linked to poor welfare, diseases and changes in the genetic structure have raised questions on the sustainability of the current practice, and The Norwegian Food Safety Authorities stated that if the welfare is not improved and the effect of cleaner fish better documented, the use can be reduced or terminated."

The [Nordic Council of Ministers report](#) (December 2021) cited a recent study by the Norwegian Food Safety Authority which revealed that salmon farmers reported a mortality rate of around 40% but that the real mortality rate was closer to 60%:

Understanding the loss of cleaner fish in the net pens

There is a high loss of cleaner fish in the net pens. The proportion of loss of cleaner fish due to escapes or mortalities is poorly known. A recent study by the Norwegian Food Safety Authorities (NFSA) revealed that the farmers registered an average mortality of around 40%, but that they believed the actual mortality was closer to 60%. This discrepancy illustrates that the current registration and reporting systems of mortality in cleaner fish are insufficient. This leads to poor data quality and makes it difficult to identify the causes of the high mortality and the actual proportions of escaped and dead fish.

The farmers reported to the NFSA that they consider de-lousing, diseases, and handling as the main causes of mortality. There are presently no adequate systems for sufficient monitoring of disease outbreaks among cleaner fish. Mortalities and escapes of cleaner fish are often not detected until long after the losses occurred. New systems for real time surveillance of cleaner fish, for example based on machine vision and artificial intelligence, can contribute to better documentation of mortality, fish health and welfare.

There should therefore be developed systems for more accurate registration of mortality and disease for cleaner fish in sea cages. In addition, today's reporting system of fish biomass and mortality to the government is outdated, making the data difficult to analyse. It is thus urgent for both the farmers and the authorities that new systems for registration of cleaner fish mortality in salmon and rainbow trout sea cages are developed.

Scamon Scotland concurs with the [Nordic Council of Ministers report](#) (December 2021) in calling for “more accurate registration of mortality and disease for cleaner fish in sea cages”.

Further information is detailed via a blog published today: [Dirty Secrets Exposed: Stop Scottish Salmon's Deadly Trade in 'Cleaner Fish'!](#)

Finally, Scamon Scotland asks the Scottish Government to provide further information on mortalities, welfare problems and diseases of cleaner fish on salmon farms in Scotland since 1 January 2020.

Please include any photos, videos, documentary evidence and any data on cleaner fish mortalities, welfare and diseases (including sea lice). For example, a [FOI disclosure by the Scottish Government in January 2018](#) included:

Attached is a photograph of a lumpfish taken during a site visit conducted as part of the Fish Health Inspectorate's aquatic animal health surveillance inspection programme.



Please include any Cabinet Briefings, correspondence with salmon farmers, the Nordic Council of Ministers and any other parties in relation to cleaner fish mortalities, welfare and diseases.

Further to [FOI 2021-00259890](#) disclosed by the Scottish Government on 10 January 2022 please also provide information on trade in cleaner fish including imports from England, Wales, Ireland (the Republic of Ireland and Northern Ireland), Iceland, Norway, France and any other countries.

Please include any 'risk assessments' and health certificates of transfers/imports of cleaner fish.

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.

Yours sincerely,

Don Staniford

Director, [Scamon Scotland](#)





George Eustice
Secretary of State for Environment, Food and Rural Affairs
Department for Environment, Food & Rural Affairs
2 Marsham Street
London
SW1P 4DF

20 April 2021

Dear Secretary of State,

Systemic Failures to Capture Evidence of Welfare Abuse on Scottish Salmon Farms

Scottish Salmon Watch is writing to you with respect to the Animal & Plant Health Agency (APHA) and their failure to inspect salmon farms in Scotland. In summary, Scottish Salmon Watch would like to raise complaints in relation to the following three issues:

- 1) The lack of quantity of salmon farm inspections**
- 2) The lack of quality of salmon farm inspections**
- 3) APHA's failure to disclose information on salmon farm inspections via FOI**

Recent video footage and a report [published by Compassion in World Farming and OneKind](#) adds weight to [damning evidence of widespread welfare abuse](#) on salmon farms in Scotland which is being willfully ignored by APHA 'inspectors'.



As a frame of reference, a critique of APHA's 'inspections' of salmon farms in Scotland during 2020 was published by Scottish Salmon Watch last week (15 April 2021) via: "[Whitewashing Welfare Abuse of Scottish Salmon \(as sponsored via RSPCA, SSPCA & APHA\)](#)".



Whitewashing Welfare Abuse of Scottish Salmon!
Read the inside story - sourced via FOI - into how
[@APHAgovuk](#) 'inspect' millions of farmed fish & turn a blind
eye to welfare abuse [@SSPOsays](#) [@scotseafarms](#)
[@kamesfishfarm](#) [@rspcaassured](#) [@marksandspencer](#)
tinyurl.com/ufm6jbbf



6:38 AM · Apr 15, 2021



Scottish Salmon Watch is particularly concerned at the following failures by APHA (which as an executive agency of DEFRA comes within your jurisdiction):

1) The lack of quantity of salmon farm inspections

In May 2020, APHA revealed via a Freedom of Information request that only 35 salmon farms had been 'inspected' since 2013 (if five salmon farms were 'inspected' after May 2020 then that brings the total figure up to 40).

The number of Salmon farm visits attended by APHA from 2013 up to April 2020 is thirty five

2013 – 13 visits
2014 – 1 visit
2015 – 1 visit
2016 – 2 visits
2017 – 2 visits
2018 – 3 visits
2019 - 13 visits
2020 – none to date.

In view of the fact (as [sourced from the latest Scottish Government data published in October 2020](#)) there are 76 freshwater salmon farms and 226 sea cage salmon farms (that's 302 salmon farms in Scotland in total) one might question the efficacy of APHA's inspection regime. You might be better at Maths than my Grade 'C' O'Level but if five salmon farms are inspected this year and next (bringing the total number up to 50) then only one in six (17%) salmon farms will have been 'inspected' in a decade'!

By contrast, [Compassion in World Farming](#) "investigated 22 farms between September and November 2020, using both drone technology and, at 6 farms, underwater divers". The appalling findings were documented on farms owned by all five of Scotland's largest salmon producers (Cooke Aquaculture, Grieg Seafood, Mowi, Scottish Sea Farms and The Scottish Salmon Company), which together account for over 96% of the industry.

2) The lack of quality of salmon farm inspections

The abject quantity of APHA 'inspections' of salmon farms is even surpassed by the abject quality of APHA 'inspections'. Information finally extracted via FOI by Scottish Salmon Watch paints a picture of ignorance and incompetence. More seriously, the documentation obtained from APHA via FOI points to collusion and corruption.

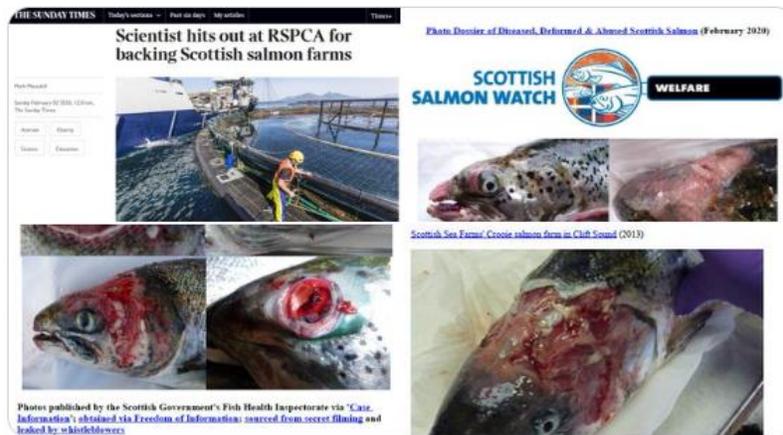
For example, APHA 'inspectors' do not take photos during 'inspections' of salmon farms unlike inspectors employed by the Scottish Government's Fish Health Inspectorate who often accompany APHA on inspections.



Don Staniford
@TheGAAIA

...

Edie Bowles [@Animallawyersuk](#) said the dossier, compiled by Don Staniford, a critic of salmon farming, indicated "systemic and obvious" pain & suffering that could justify legal action against [@scotgov](#) [@MairiGougeon](#) [@SSPOsays](#) tinyurl.com/yxy775wp [@SundayTimesScot](#) [@ciwf](#) [@scotgp](#)



9:54 AM · Feb 2, 2020 · Twitter Web App

Photos are a vital part of inspections and can provide case evidence of welfare abuse. APHA's failure to compile photographic evidence is a serious flaw and illustrates the lack of scrutiny. Despite [legal threats from salmon farmers](#) (who argued that disclosure would be commercially damaging and would put consumers off eating farmed salmon), the Scottish Government has [published damning photographic evidence sourced from inspections of salmon farms by the Fish Health Inspectorate](#) (including at [RSPCA Assured salmon farms](#) which are claimed to comply with the [strictest welfare standards](#)).



Given the serious nature of the allegations, Scottish Salmon Watch would hope that DEFRA investigates APHA's surveillance and inspection regime for salmon farms in Scotland. Some of the documentary evidence is set out here but there is more context provided via "[Whitewashing Welfare Abuse of Scottish Salmon \(as sponsored via RSPCA, SSPCA & APHA\)](#)".

When APHA 'inspectors' visit a salmon farm it is not even clear if they take samples of farmed salmon out of the water to check for welfare problems. Following last month's [video evidence of welfare abuse at Mowi, Cooke Aquaculture, Grieg Seafood, Scottish Sea Farms and The](#)

[Scottish Salmon Company](#), Mowi [posted a series of video clips](#) showing the health status of farmed salmon at Gorsten in Loch Linnhe (an [RSPCA Assured and ASC-certified site exposed by Netflix's 'Seaspiracy'](#) as having problems with infectious diseases and mass mortalities).



What is the protocol for APHA 'inspectors' when they 'inspect' salmon farms in Scotland? Do APHA 'inspectors' handle every fish in order to properly check for fin damage, lesions, cataracts, spine deformities, lice infestation and other welfare problems?

From the FOI documents [disclosed by APHA to Scottish Salmon Watch on 13 April 2021](#) it seems that APHA 'inspectors' are more interested in where they can meet up for lunch and have a cup of tea before an 'inspection' rather than thoroughly inspecting the farmed salmon. How many fish do APHA inspectors take out of the cages or tanks to check closely? Do APHA inspectors use Go Pro cameras inserted into the cages or tanks? Is video surveillance provided by the salmon farming company?

From reading the 'inspection' reports filed by APHA – and considering the amount of time APHA 'inspectors' actually spend on site (a matter of hours out on the cages it would seem) – it is hard to escape the conclusion that APHA's 'inspections' are woefully inadequate. Scottish Salmon Watch certainly does not expect APHA 'inspectors' to spend 10 minutes with each fish as GPs are tasked with in the NHS but it appears that millions of farmed salmon are slipping through the inspection net.

For example, during an 'inspection' of Grieg Seafood's Leinish salmon farm in Loch Dunvegan on 25 August 2020 APHA claimed to have 'inspected' and passed for inspection a quarter of a million farmed salmon in less than five hours (and the 4 hour 40 minute visit presumably wasted time in a boat out to the farm and back again).

Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number

2. Name and address

4. Date of Visit

5. Time of visit

Part 2: Detail

6. Present at visit:

(List the names and roles of attendees at the visit)

██████████, Marine Scotland; ██████████ (Animal and Plant Health Agency), ██████████ (Grieg Seafood, ██████████) and party ██████████ (Grieg Seafood, ██████████).

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Salmo salar	250,064	250,064	0	0

Such a speedy ‘inspection’ begs the questions:

How many farmed salmon did APHA actually pick up to physically inspect?

Did APHA use a Go Pro camera or other video surveillance to view the fish deeper in the cages or did they just ‘inspect’ the farmed salmon swimming near the surface?

Here's just some of the thousands of dead farmed salmon which Scottish Salmon Watch 'inspected' when we visited Dunvegan public pier – where Grieg Seafood store mass mortalities – in [July 2020](#) and [September 2020](#). Grieg Seafood later [reported 78.3% mortality at their disease-ridden Leinish salmon farm](#).



Don Staniford @TheGAAIA

Grieg Seafood reports Heart & Skeletal Muscle Inflammation (Piscine Reovirus) in Loch Dunvegan on Skye tinyurl.com/y29yky8v @GriegShetland @SSPOsays @marinescotland @APHAgovuk @IainNaHoe @WHFP1 @ScotSalmonTank @KateForbesMSP tinyurl.com/u3mxays @FergusEwingMSP @scotgp

Fish Health Inspectorate case information: 2020

Business No: F90442 Date of Case: 06/07/2020
Site No: F31207 Site Name: Lochan
Inspector: Case No: 20200348

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

Passive Surveillance Inspection

A notification of mortality levels above the reporting criteria was received by the Fish Health Inspectorate on 02/07/2020 for the period of 22/06/2020 to 28/06/2020.

9:31 AM · Sep 21, 2020

APHA's 'Report on Fish Welfare for Scottish Government' regarding their visit to Grieg Seafood's Lenish salmon farm on 25 August 2020 detailed over 150,000 dead farmed salmon in a five week period including 107,700 mortalities during Week 33 (10 to 16 August 2020) and 40,260 mortalities during Week 34 (17 to 23 August 2020) immediately prior to APHA's visit.

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

FINDINGS	
At the time of inspection 9/10 cages were stocked with 250,064 Atlantic salmon with an average weight of 2.2kg.	
SEA LICE	
below the reporting levels. Salmosan used.	
MORTALITY	
Week 30	- 0.78% - 3,124
Week 31	- 0.93% - 3,726
Week 32	- 1.37% - 5,400
Week 33	- 27.65% - 107,700
Week 34	- 14.29% - 40,260

Did APHA's 'inspector' not notice all the carcasses of diseased and dead farm or were they lying dead at the bottom of the cages out of sight? Or had they already been taken away for disposal before the inspector arrived?

A few days before another 'inspection' of an [RSPCA Assured salmon farm operated by Kames Fish Farming in Loch Tralaig](#), APHA was contacted by the salmon farmer who was tipped off about the 'inspection' by, it seems, the Scottish Government's Fish Health Inspectorate.

From: [REDACTED] <[REDACTED]@kames.co.uk>
Sent: 15 September 2020 18:18
To: [REDACTED] <[REDACTED]@gov.scot>
Subject: FW: Visit to Loch Tralaig

Hi [REDACTED]

I was informed by [REDACTED] that you will be visiting us on Thursday. We do have PPE and lifejackets if needed. I will meet you 10am Thursday at the hatchery.

Kind Regards

[REDACTED]

Kames Fish Farming Limited
Kilmelford
Oban
PA34 4XA
Tel: [REDACTED]
Mobile: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]@kames.co.uk

Is it standard operating procedure for salmon farming companies to be notified prior to 'inspections'?

From: [redacted]@gov.scot]
Sent: 15 September 2020 17:34
To: [redacted]@Kames.co.uk>
Subject: Visit to Loch Tralaig

H [redacted]

As discussed on the phone I will be accompanying a vet from APHA ([redacted]) to visit Loch Tralaig on Thursday morning. We will meet at the hatchery at ~10am. I've asked her to let me know regarding the best approach for the paperwork. I'll let you know when I hear back.

I forgot to ask you on the phone regarding your current approach to PPE for visitors – do you have any available for [redacted]? I've asked [redacted] to confirm whether [redacted] has PPE – in particular a lifejacket. I will have my own stuff as usual.

See you on Thursday.

Regards

[redacted]
Fish Health Inspectorate [redacted]
Marine Scotland - Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB
Tel: [redacted]
S/B [redacted]
e: [redacted]@gov.scot
w: <https://www.gov.scot/marine-and-fisheries/>

Scottish Salmon Watch naively assumed that 'inspections' of salmon farms were unannounced.

An APHA 'Fish Farm Inspection Report' marked "Official-Sensitive" detailed how APHA inspected 70% of 200,100 fish at the [RSPCA Assured Loch Tralaig salmon farm](#) on 17 September 2020.

Scottish Government

Appendix 7



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FB0134	2. Date of Visit	17/09/2020
3. Name and address	Kames Fish Farming Kames Kilmelford OBAN Argyll and Bute Postcode PA34 4XA		

4. Location of Fish (if different from above)
 Loch Tralaig
 Kinlinver
 Argyll
 Postcode PA35 1HJ

5. Category
 Fresh water salmon site

6. Visit Type
 Complaint

7. Visit sub type (Targeted only)
 N/A

8. Target date
 N/A

9. Name and contact details of Private Veterinary Advisers:
 [REDACTED]

10. Have the Veterinary Advisers been contacted before the visit? Yes No

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Salmon Smolts	~200100	~70%	0	compliant

I had to get the calculator out for this one: it represents just over 140,000 farmed salmon which APHA claim to have ‘inspected’ in a visit which started at 10.30am and presumably only last a few hours. When Scottish Salmon Watch [visited the same salmon farm earlier in September 2020](#) we filmed inside the cages and could not see beneath the surface – even with a Go Pro – due to the peaty and [polluted nature of the water](#). But we captured video evidence of welfare abuse and farmed salmon floating on the surface either dead or dying.



Unlike when APHA visited on 17 September 2020, Scottish Salmon Watch's visit was unannounced and Kames staff did not have time to dispose of the dead and dying fish. If APHA had 'inspected' the salmon farm earlier then they would have [captured video evidence of welfare abuse](#).



A cynic might conclude that the current 'inspection' regime is loaded so firmly in favour of the salmon farming companies that reports of non-compliance are nigh impossible. Once again, this APHA 'inspection' leaves question marks. How many of the 140,000 farmed salmon did the APHA 'inspector' actually sample for 'inspection'? How did the APHA 'inspector' properly 'inspect' 140,000 farmed salmon when visibility in Loch Tralaig is so poor? Why was Kames notified in advance of the 'inspection'?

In another case [disclosed by APHA via FOI on 13 April 2021](#), it seems that the head veterinarian at Scottish Sea Farms (who was [appointed chair of the SSPCA in 2018](#)) was aware of a "possible APHA visit" to his RSPCA Assured Scallastle Bay salmon farm beforehand.

From: [REDACTED] [@scottishseafarms.com](mailto:[REDACTED]@scottishseafarms.com)
Sent: 16 October 2020 14:57
To: [REDACTED] [@apha.gov.uk](mailto:[REDACTED]@apha.gov.uk)>

Subject: Scallastle issue

Hi [REDACTED],

Hope you are staying safe and well in these strange times.

I'm working from home but I got a message from our Stirling office regarding a possible APHA visit in response to a [REDACTED] about the Scallastle farm. The message was third-hand and not entirely clear but your name was mentioned.

As with all SSF stock, these fish will be under my veterinary care so if there's anything I should know, or any query I can help with, I'd be happy to talk. However, my phone signal is really poor here so a call via WhatsApp (same mobile number) or setting up a web-based call would probably be easier.

Best regards,

[REDACTED] | **Scottish Sea Farms Limited**
Laurel House, Laurelhill Business Park, Stirling FK7 9JQ
Tel: [REDACTED] **Mobile:** [REDACTED]
www.scottishseafarms.com | www.facebook.com/scottishseafarms |
www.twitter.com/scotseafarms

And it seems that by the time APHA did visit Scallastle Bay on the Isle of Mull all the RSPCA Assured farmed salmon had been harvested out and there were zero fish to inspect!

From: [REDACTED] [@scottishseafarms.com](mailto:[REDACTED]@scottishseafarms.com)
Sent: 16 October 2020 17:32
To: [REDACTED] [@apha.gov.uk](mailto:[REDACTED]@apha.gov.uk)>

Subject: RE: Scallastle issue

Sorry, [REDACTED] I should probably have made it clear that harvest operations have been going on at Scallastle since the summer, rather than just very recently, which is why I don't have the dates to hand.

Cheers,

[REDACTED]

From: [REDACTED]
Sent: 16 October 2020 17:22
To: [REDACTED] [@apha.gov.uk](mailto:[REDACTED]@apha.gov.uk)>

Subject: RE: Scallastle issue

It should all be finished on Sunday, [REDACTED] – I've no reason to think that harvest will be delayed this weekend, so I don't expect there to be anything on site next week.

I'll ask for details of those harvest dates for you – I don't have them here.

Cheers,

[REDACTED]

And it appears that APHA tipped Scottish Sea Farms off regarding the outcome of their 'investigation' .

From: [REDACTED]@scottishseafarms.com]

Sent: 20 November 2020 17:44

To: [REDACTED]@apha.gov.uk>

Subject: SSF Scallastle additional records

Hi [REDACTED]

As requested, please see attached additional records for Scallastle -- [REDACTED]

[REDACTED]

[REDACTED]

I trust this meets your needs, but please don't hesitate to contact me if you need any further information.

I appreciate this is not APHA normal procedure but can I ask if you are able to provide a letter to me when you have completed your investigation with the outcome for our records.

Best regards,

[REDACTED]

[REDACTED]

Scottish Sea Farms Limited,

Laurel House, Laurelhill Business Park, Stirling, Scotland, UK, FK7 9JQ

Tel: [REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: RE: SSF Scallastle additional records
Date: 23 November 2020 10:04:00
Attachments: [REDACTED].png

Hi [REDACTED]

Thanks you for this.

Re letter: I have passed your query to senior management. As you know, at the moment we do not have such a standard procedure, and I personally do agree it should be there.

We have this VCF letter we provide following cross compliant visits, but are related to claimant farmers: the form is set for this.

Will my official conclusion below, as stated in my report, provide the sort of feedback you are looking for?

I can confirm to you that following our remote meeting, as APHA inspector, my conclusion related to the 2020 Scallastle anonymous complaint received is:

[REDACTED]

[REDACTED]

I hope this satisfy your query,

Should you need any further information, please do not hesitate to contact me.

Thanks for your cooperation,

Kind regards,

[REDACTED]

APHA Perth Field Services
Animal and Plant Health Agency (APHA)

Telephone: [REDACTED] | Mobile: [REDACTED] | Email: [REDACTED]

Such collusion and possible corruption is alarming and demands investigation by DEFRA. Is it standing operating procedure for APHA staff to be so close to the salmon farming sector and notify companies in advance of the outcome of ‘investigations’?

Scottish Salmon Watch [read in the Ferret](#) that the salmon farming industry [wined and dined Anne Anderson](#) before she left the Scottish Environment Protection Agency in 2018 to join the Scottish Salmon Producers Organisation as ‘[Director of Sustainability](#)’ and then just last month [joined Scottish Sea Farms as head of ‘Sustainability and Development’](#).

How many APHA ‘inspectors’ are now working for the salmon farming industry? If they’re not already then it seems that their *modus operandi* is weighted towards whitewashing welfare problems away.

Another APHA ‘inspection’ at Mowi’s Lochailort Recirculation Unit in September 2020 claimed to have ‘inspected’ ca. 75% of 4.4 million farmed salmon. Again my basic Maths tells me that three quarters of 4.4 million is over 3 million fish ‘inspected’ and over 3 million fish passed by the APHA ‘inspector’.

Fish Farm Welfare Inspection Report				Further Action
General details (Refer to Guidance Notes (WF153))				
1. Reference number	FS1269	2. Date of Visit	9/09/2020	
3. Name and address	MOWI Lochailort Recirculation Unit Lochailort Inverness Shire Postcode PH38 4LZ			
4. Location of Fish (if different from above)	Postcode			
5. Category	Hatchery	6. Visit Type	Routine	
7. Visit sub type (Targeted only)	N/A	8. Target date	N/A	
9. Name and contact details of Private Veterinary Advisers:	[REDACTED]			
10. Have the Veterinary Advisers been contacted before the visit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.				
Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Fry (Salmon)	840000	~75%	0	
Parr (Salmon)	2.4million	~75%	0	
Smolts (Salmon)	~1.2 million	~75%	0	

But how many of the 3 million farmed salmon did the APHA ‘inspector’ actually fish out with a net to physically inspect properly or pinpoint closely with a video camera?

APHA's 'Fish Farm Welfare Inspection Report' of Mowi's Lochailort Recirculation Unit in September 2020 cited "some evidence of fin damage" in farmed salmon due to "precocious parr (gonad development in the males causing aggression)". How did APHA assess the evidence of fin damage and conclude that no action needed to be taken on 3 million fish?

The [FOI disclosure by APHA to Scottish Salmon Watch on 13 April 2021](#) also gives a glimpse into how fast the 'inspectors' work. A 'Fish Farm Welfare Inspection Report' of the Barcaldine Smolt Unit operated by Scottish Sea Farms dated 14 September 2020 details how APHA inspected 1,597,623 farmed salmon. That's bloody good going for a day's work and may explain why APHA didn't have time to take any photos. Even more impressive, APHA reported that every single one of the 1,597,623 fish 'inspected' at the Barcaldine facility was "compliant".

Fish Farm Welfare Inspection Report		Further Action		
General details (Refer to Guidance Notes (WF153))				
1. Reference number	FB0125- FS 1328	2. Date of Visit	14/9/20	
3. Name and address	Scottish Sea Farms (FB0125) Scottish Sea farm Laurel Ho/Laurelhill Business Park, Stirling Postcode FK7 9JQ			
4. Location of Fish (if different from above)	Barcaldine Unit (FS1328) Barcaldine Oban Postcode PA37 1SE			
5. Category	Freshwater -atlantic salmon	6. Visit Type	Routine	
7. Visit sub type (Targeted only)	N/A	8. Target date	N/A	
9. Name and contact details of Private Veterinary Advisers:	[REDACTED]			
10. Have the Veterinary Advisers been contacted before the visit? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.				
Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Atlantic Salmon Freshwater Smolt 1: 8 tanks	993085	993085	0	C
Atlantic Salmon Freshwater Smolt 2: 8 tanks	604538	604538	0	C

However, Scottish Salmon Watch seriously question the thoroughness of APHA's 'inspection' and asks DEFRA to scrutinize how APHA 'inspects' salmon farms. The documents disclosed by

APHA on 13 April 2021 are obviously available to DEFRA but Scottish Salmon Watch, in the spirit of transparency, has made them [publicly available online](#).

2 Attachments



[Appendix 1](#); [Appendix 2](#); [Appendix 3](#); [Appendix 4](#); [Appendix 5](#); [Appendix 6](#); [Appendix 7](#); [Appendix 8](#); [Appendix 9](#); [Appendix 10](#); [Appendix 11](#); [Appendix 12](#); [Appendix 13](#); [Appendix 14](#); [Appendix 15](#); [Appendix 16](#); [Appendix 17](#); [Appendix 17a](#); [Appendix 18](#); [Appendix 19](#); [Appendix 20](#); [Appendix 21](#); [Appendix 22](#); [Appendix 23](#); [Appendix 24](#); [Appendix 25](#); [Appendix 26](#); [Appendix 27](#); [Appendix 28](#); [Appendix 29](#); [Appendix 30](#); [Appendix 31](#); [Appendix 32](#) and [Appendix 33](#)

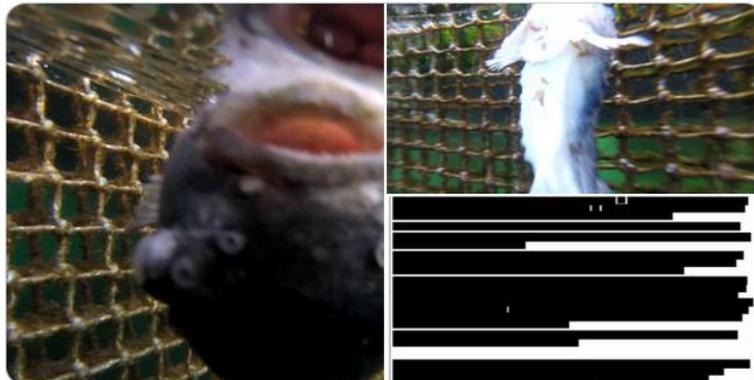
Another [FOI disclosure by APHA in March 2020](#) provides further evidence of incompetence and negligence by APHA in relation to salmon farm 'inspections' (or not as the case may be) as well as worrying censorship (see point 3 for further details).



Don Staniford
@TheGAAIA



Censored: Welfare Abuse on Salmon Farms - redacted
FOI documents reveal welfare breaches of Animal
Health & Welfare Act [@rspcaassured](#)
[@MowiScotlandLtd](#) tinyurl.com/yb9wr3nk
[@APHAgovuk](#) [@marinescotland](#) [@ProfCMDwyer](#)
[@SSPCA_Mike](#) [@SSPOsays](#) [@ChrisGPackham](#)
[@markuskell](#) [@scotgp](#)

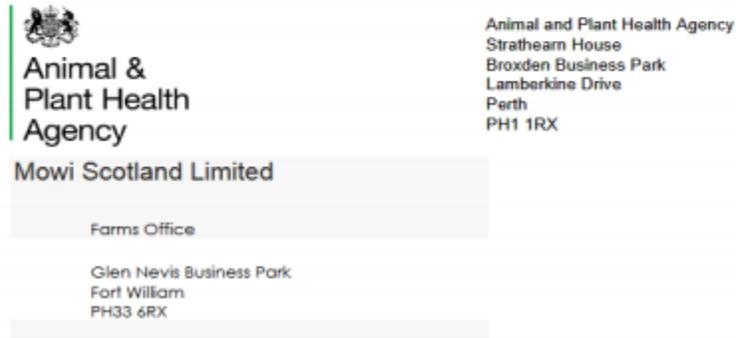


Roseanna Cunningham and 8 others

9:53 AM · Apr 23, 2020 · Twitter Web App

Scottish Salmon Watch [reported in April 2020](#):

Welfare abuse on salmon farms across Scotland is being systematically covered up [according to censored documents obtained via Freedom of Information](#). The heavily redacted reports, letters and emails were finally disclosed last month by the Animal & Plant Health Agency (APHA) - the government body responsible for policing fish welfare - after months of delay [1]. The commercially sensitive documents included [damning evidence of welfare abuse by Mowi](#) at the aptly named 'Bay of Dead Heads' salmon farm in the Sound of Jura.



16 September 2019

Dear [REDACTED]

Failure to Comply with Welfare Legislation

Animal Health and Welfare (Scotland) Act 2006

You have not been able to show that adequate actions were taken in the period between the 10/07/19 to the 12/08/19 in order to promote the welfare of the lumpfish under your responsibility. Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease.

This is a failing to comply with the Animal and Welfare (Scotland) Act 2006, Part 2-24 (1) and 3(e) that states that:

"a person commits an offence if the person do not take such steps as are reasonable in the circumstances to ensure that the needs of an animal for which the person is responsible are met to the extent required by good practice";

An animal's needs include *"its need to be protected from suffering, injury and disease."*

APHA's investigation into Mowi's feedlot within the [Argyll Hope Spot](#) in August 2019 was triggered by [secret video footage shared by Scottish Salmon Watch in July 2019](#) (although documents reveal that APHA initially classified the welfare risk as 'low' priority).

In November 2019, The Ferret & Sunday National [reported that Mowi had been "rapped" by APHA for welfare breaches](#).

In a [FOI appeal dated 23 April 2020 to the Information Commissioner](#), Scottish Salmon Watch wrote:

It is a shocking admission that APHA "do not hold any photographs taken during inspections". Are they too busy having a cup of tea with their salmon farming buddies to bother to properly inspect for welfare abuse? If APHA was serious about prosecuting companies for breaches of welfare laws it would take video and photographic evidence.

In April 2020, Scottish Salmon Watch [published a dossier on APHA's abject failings on fish welfare](#).

Appalling Pathetic Horrific Abject (APHA) - Failing Fish Welfare Since 2013!

The week before APHA's FOI disclosure on 10 March 2020, [APHA's Jenni Diffin told the Fish Veterinary Conference in Edinburgh that there had been a significant increase in welfare complaints over the last 18 months \[2\]](#). However, it is clear that APHA's track record in investigating welfare abuse on salmon farms is absolutely pathetic due largely to a lack of resources and lack of inspections as well as a 'reactive' not proactive policy of policing.

A damning report - '[An Autopsy of An All Clear](#)' - by Corin Smith published in September 2019 detailed systemic failures in how APHA and the Scottish Government policed animal welfare at a [lice-infested salmon farm operated by The Scottish Salmon Company in Loch Roag \[3\]](#).



Scottish Salmon Watch's experience with APHA is similarly woeful. In November 2018, APHA refused to disclose information on salmon farms in Scotland via ATIC1490 citing commercial confidentiality [4] - a mantra repeated via FOI refusals in 2019 and 2020.

In October 2018, APHA disclosed various background documents on salmon farm inspections via ATIC1426 at least shedding some light on how APHA has allowed salmon farms to slip through the welfare net [5].

According to the FOI reply (ATIC1426), APHA (known as AHVLA prior to October 2014) only carried out its first inspection of a salmon farm in 2013 even though the [Animal Health & Welfare \(Scotland\) Act came into force in 2006](#). APHA admitted in 2012 that they only had a budget for two to three visits to salmon farms per year due to the extra cost of inspections at sea farms compared to land farms. Moreover, APHA admitted in 2017 that it did not carry out any inspections of fish farms in 2016/17 due to resources going to England (believed to be re-directed to the badger cull).

A document dated 2012 admitted that "Volumes of welfare visits will be low so approx 2-3 per annum but distances travelled and time could be significant. Therefore is expected the overall cost of fish welfare visits are likely to be much greater than the unit price for land based farm visits".

Scottish Salmon Watch's dossier – "[Appalling Pathetic Horrific Abject \(APHA\) – Failing Fish Welfare Since 2013!](#)" (April 2020) - also included:

APHA reported internally in January 2017:

The fish visits have not happened for 2016/17 but are scheduled for February. I am concerned about resource and the wisdom of organising fish farm visits, I would actually favour pushing these back to the late spring or summer - but would not want to send the message that we are not delivering for SG because of resource going to help the ██████████ in England.

In July 2018, Scottish Salmon Watch wrote to APHA:

"Scottish Salmon Watch understands that it is APHA not Marine Scotland who is the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. As [Scottish Salmon Watch's letter dated 13 July 2018](#) cited:

[A letter from Jill Barber, Aquaculture Health, Welfare and Innovation Manager, at the Scottish Government dated 9 July 2018](#) also identifies the [Animal and Plant Health Agency \(APHA\)](#) as the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006:

Fish Health Inspectors will report any significant case of poor welfare to Animal and Plant Health Agency (APHA) veterinarians, responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. If APHA suspect that an offence may have been committed under the Act, there are various enforcement options including issuing advice, warning letters and care notices, and the option of passing evidence for a potential prosecution to the Procurator Fiscal to consider.

APHA's [FOI disclosure in March 2020](#) even redacted data on the number of fish 'inspected' and passed for inspection (unlike [APHA's FOI disclosure of 13 April 2021](#) which at least provided that information).

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Farmed Fish (Salmon)	████	████	█	████
Farmed fish (Ballan Wrasse)	██	██	█	████

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Duartmore Indoor Hatchery	██████████	██	█	████
Duartmore Tanks	██████████	██	█	████

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Atlantic Salmon	████	████	██	████
Lumpsucker	████	████	██	████

Read in full via "[Censored: Welfare Abuse on Salmon Farms](#)"

APHA's failure to inspect salmon farms is therefore all the more disturbing given how the Scottish Government has passed the bureaucratic buck and responsibility for fish welfare onto APHA.

Scottish Salmon Watch's [complaint to APHA and Police Scotland back in July 2018](#) recommended targeted inspections of salmon farms in the last few months of their harvest cycle

(rather than inspecting an empty salmon farm or a site which has just harvested out tens of thousands of diseased farmed salmon):

However, Scottish Salmon Watch firmly believes that the damning photographic evidence [published by The Ferret in June 2018](#) and case information via Fisheries Health Inspectorate reports are merely the tip of an iceberg. Enhanced inspections and an increased number of inspections at salmon farms [towards the end of their harvest cycle](#) would surely uncover further damning evidence of welfare abuse.

With mass mortalities, infectious disease and welfare problems [expected to peak in late Summer and early Autumn](#), Scottish Salmon Watch recommends that Police Scotland and APHA conduct targeted inspections at salmon farms reaching maximum biomass and in the last few months of their harvest cycle.

Please note that on 1 September 2018, new biomass data for the second quarter of 2018 (April to June) goes online via [Scotland's Aquaculture web-site](#). Police Scotland and APHA could use this data to work out which salmon farms in Scotland are reaching maximum biomass and nearing the end of their production cycle (which is [now an average of 16 months compared to an average of 20 months a decade ago](#)) when welfare problems are at their worst.

Scottish Salmon Watch asked in September 2019 via [“Welfare Abuse at Scottish Salmon Farms - Why No Legal Enforcement Or Prosecutions?”](#):

“The weight of evidence recording widespread welfare abuse on Scottish salmon farms is surely now so overwhelming to bring legal action for systematic breaches of the [Animal Health & Welfare \(Scotland\) Act 2006](#)?..... Yet the 'competent' authorities with responsibility for animal welfare - in the shape of Scottish Ministers, the Animal & Plant Health Agency, the SSPCA and Police Scotland's Wildlife Crime Unit - are turning a [blind eye](#) to systematic and shocking welfare abuse on salmon farms. Raising complaints feels like banging your head against a brick wall.”



Scottish Salmon Watch asked again in October 2020: “[Ongoing Welfare Abuse & Unnecessary Suffering on Salmon Farms - Why No Prosecutions?](#)”



It is painfully clear that the answer largely lies with APHA’s abject failure to inspect salmon farms – both quantitatively and qualitatively. Scottish Salmon Watch firmly believes that APHA is guilty of failing to follow its statutory duties via the [Animal Health and Welfare \(Scotland\) Act 2006](#).

3) APHA’s failure to disclose information on salmon farm inspections via FOI

APHA’s systemic failures to adequately inspect salmon farms in Scotland – whether it is due to a lack of resources, an institutional bias in favour of salmon farming or lack of political will – are compounded by their failures to disclose information via FOI.

Scottish Salmon Watch’s history of dealing with APHA in terms of FOI disclosure is appalling and certainly the worst experience I’ve ever encountered in a Government agency in [two decades of attempting to extract information](#) (and please note that I’ve dealt with the Scottish Government which [has not exactly oozed transparency](#) via various [FOI denials and appeals](#) and with the Scottish Environment Protection which [places commercial confidentiality ahead of environmental responsibility](#)).

When Scottish Salmon Watch filed a FOI request with APHA in November 2020 we asked: “Please provide information relating to the inspection of salmon farms since 1 May 2020. Please include inspection reports, emails, letters, photos, videos, assessments and any other information relating to the inspection of salmon farms since 1 May 2020. This FOI request would certainly capture information in relation to Kames Fish Farming's Loch Tralaig salmon farm.”

When APHA denied our FOI request later in November 2020 – claiming that APHA had “carried out no inspections” of salmon farms since 1 May 2020 – Scottish Salmon Watch cited ‘Case Information’ published by the Scottish Government’s Fish Health Inspectorate (and provided to Scottish Salmon Watch by the Scottish Government via FOI in December 2020) that detailed a site inspection where the inspector “accompanied APHA vet” to Kames Fish Farming's Loch Tralaig salmon farm:

Case No:	2020-0392		Date of visit:	17/09/2020	
Time spent on site:	3.5 hours		Main Inspector:	[REDACTED]	
Site No:	FS0468	Site Name:	Loch Tralaig		
Business No:	FB0134	Business Name:	Kames Fish Farming Ltd		
Case Types:	1 WEL	2	3	4	5
Water Temp (°C):	13.6	Thermometer No:	Site	FHI 045 completed	<input type="checkbox"/>
Observations:	Region:	ST	Water type:	F	CoGP MA:
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.			
Clinical signs of disease observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.			
Gross pathology observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.			
Diagnostic samples taken?	<input type="checkbox"/>				

Accompanied APHA vet for site inspection following welfare complaint in relation to mortalities and moribund fish observed on site.

“This begs the question: why did APHA lie when it stated on 20 November 2020 that it had "carried out no inspections" of salmon farms since 1 May 2020?” wrote Scottish Salmon Watch in an FOI review request to APHA dated 9 December 2020 . “Following APHA's reply to this review, Scottish Salmon Watch will be filing an official complaint.”

“APHA visit fish farms in response to welfare complaints,” replied APHA’s FOI review dated 31 December 2020. “We do not routinely inspect fish farms.....APHA do carry out visits following welfare complaints and investigations are carried out based on the allegations. These are not routine inspections as we interpreted from your request and therefore responded correctly, no information is held.”

APHA’s FOI review concluded: “The result of this Internal Review is that APHA responded fully and correctly to your original request dated 4 November 2020, confirming that we do not undertake inspections but investigate allegations of welfare abuses/issues. As we do not carry out inspections no information is held.”

Don Staniford
{By Email}

Our Ref: ATIC 2220

31 December 2020

Dear Don Staniford

INTERNAL REVIEW RESPONSE

You have requested that APHA conducts an Internal Review on the response you received from us following your information request on 4 November 2020.

The Request

APHA received a request for information from you on 4 November 2020 as follows:

"Please provide information relating to the inspection of salmon farms since 1 May 2020.

Please include inspection reports, emails, letters, photos, videos, assessments and any other information relating to the inspection of salmon farms since 1 May 2020. This FOI request would certainly capture information in relation to Kames Fish Farming's Loch Tralaig salmon farm".

APHA responded to you on 20 November 2020 advising we had carried out no inspections and therefore, no information was held. We took this opportunity to remind you of our role regarding fish farms. APHA visit fish farms in response to welfare complaints. We do not routinely inspect fish farms.

APHA do carry out visits following welfare complaints and investigations are carried out based on the allegations. These are not routine inspections as we interpreted from your request and therefore responded correctly, no information is held.

Internal Review Decision

The result of this Internal Review is that APHA responded fully and correctly to your original request dated 4 November 2020, confirming that we do not undertake inspections but investigate allegations of welfare abuse/issues. As we do not carry out inspections, no information is held. A list of what APHA do and do not do was supplied to you within the response.

Kafka must be required reading at APHA.

Scottish Salmon Watch filed a new FOI request in March 2021:

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Mar 9, 2021 at 6:00 AM
Subject: FOI re. salmon farms since 1 January 2020
To: SM-APHA-Enquiries APHA <enquiries@apha.gov.uk>

Please provide information on salmon farms since 1 January 2020.

Please note that ATIC2220 replied by APHA on 2 January 2021 denied information relating to the 'inspection' of salmon farms.

Scottish Salmon Watch take issue with APHA's narrow interpretation of 'inspection' hence this new FOI request.

Please include copies of any reports, emails, letters, photos, videos, assessment and any other information relating to salmon farms.

This would certainly include any information relating in any shape or form to monitoring, surveillance, visits and what many people would refer to as 'inspection' of salmon farms where APHA accompanies the Scottish Government's Fish Health Inspectorate.

For example, in addition to the site visit to Loch Tralaig which APHA has refused to disclose via ATIC2220, please provide information relating to Loch Creran. The Scottish Government's Fish Health Inspectorate reported on 4 March 2021 via <https://www.gov.scot/publications/fish-health-inspectorate-mortality-information/>:

Event No	Reporting Business	Site Name	Date	Mortality %	Mortality #s	Additional information	Action taken by FHI
MRT01956	Scottish Sea Farms Ltd	Loch Creran (B)	02/11/2020	8.6	not provided	44. Increased fish health & welfare monitoring. Mortality returned below 1% in following week	FHI to arrange a site visit with APHA
MRT01954	Scottish Sea Farms Ltd	Loch Creran (B)	23/10/2020	8.25	not provided	Use of aeration system, Veterinary visit & further biological samples taken to monitor recovery of gill pathology. Histopathology results confirmed waterborne insult to gills.	FHI to arrange a site visit with APHA. Note; originally input and sent through as MRT01939 but overwritten.
MRT01955	Scottish Sea Farms Ltd	Loch Creran (B)	23/10/2020	6.66	not provided	Continued use of aeration system & fish health & welfare monitoring. Physical delicing scheduled at end of week.	FHI to arrange a site visit with APHA. Note; originally input and sent through as MRT01940 but overwritten.
MRT01953	Scottish Sea Farms Ltd	Loch Creran (B)	23/10/2020	4.45	not provided	Increased capacity for mortality removal, withheld feed, fish health investigation; fish & daily water samples taken for diagnosis; plankton samples showed combined diatom bloom of Chaetoceros debilis & Asterionellopsis glacialis in week	FHI to arrange a site visit with APHA. Note; originally input and sent through as MRT01938 but overwritten.

The data entries for November 2020 include:

"FHI inspected site accompanied by APHA vet on 10/11/2020" (sic)
"FHI to arrange a site visit with APHA"

Following [APHA's heavily redacted FOI reply dated 13 April 2021](#), Scottish Salmon Watch will be filing another appeal to the Information Commissioner.

APHA's [FOI reply in March 2020](#) – which also redacted huge tracts of reports – was [appealed by Scottish Salmon Watch to the Scottish Information Commissioner in April 2020](#). Our appeal included:

Scottish Salmon Watch's [FOI review request to APHA dated 25 October 2019](#) included:

It is shocking that APHA maintains that "the commercial interests of our customers outweighs that of the public right to know".

Surely customers of supermarkets buying farmed salmon have a right to know if they're sourced from disease-ridden farms? Surely customers of restaurants have a right to know which businesses are guilty of welfare abuse?

If APHA's sole duty is to salmon farmers and protecting this disease-ridden industry from public scrutiny then it is surely a Government agency operating against the public interest and outwith FOIA laws. Scottish Salmon Watch looks forward to debating these issues further and making a formal submission and appeal to the Information Commissioner.

And:

Scottish Salmon Watch strongly objects to the non-disclosure of photos held by APHA and maintains that APHA has misapplied the 'Public Interest Test'. APHA's argument that the disclosure of photographs by third parties "will disrupt...processes in investigating allegation and likely prejudice and our ability to liaise with Local Authorities and/or Fish Health Inspectorates to undertake their functions" simply does not hold water.

In the first stance, the Scottish Government's Fish Health [Inspectorate routinely publishes damning photos of diseased farmed salmon via 'Case Information' which is updated online on a monthly basis](#) since a [landmark FOI ruling in June 2018 \(despite legal threats from salmon farming companies\)](#).

Photographic evidence and 'case Information' are now routinely reported on by the media including [Private Eye](#) and [The Ferret](#), NGOs such as [PETA](#) and [OneKind](#) as well as via [press releases](#), [blogs](#) and [Tweets](#). Scottish Salmon Watch [published a dossier of photographs](#) (mostly sourced via FOI from the Scottish Government or published by the Scottish Government) in February 2020.

And:

APHA's [letter dated 10 March 2020 via ATIC1836](#) also cited 'Section 43 - Commercial Interest' including:

Section 43 – Commercial Interest

The photographs have been provided by third parties. Following considerations into this request, APHA have considered the level of harm and the impact possible disclosure would have and have withheld the photos under Section 43(2) – Prejudice to Commercial Interest.

The third party provided photos are part of allegations made from anonymous (or otherwise) sources. It may be harmful should the photos be released as APHA cannot verify the photos. If released, the photos could cause the farms negative publicity.

Public Interest Test

The exemption in Section 43 is subject to a Public Interest Test to ensure it is being appropriately applied.

The disclosure of the information you have requested has the potential to prejudice the commercial interests of the farm. We believe that in releasing unverified photographs could potentially lead to an adverse working relationship between APHA and the farm interfering with us carrying out our statutory duties. Releasing photos alleged of a particular farm could interfere with the business and running of a farm in completion with its competitors.

Scottish Salmon Watch strongly disagrees with APHA's application of the 'Public Interest Test' and assertion of the rights of companies to blanket confidentiality (as evidenced by APHA's heavy-handed redaction of documents) over and above the public's right to know.

APHA's claim that "releasing photos alleged of a particular farm could interfere with the business and running of a farm in completion with its competitors" is moot in relation to Mowi's Muck salmon farm since the photos and [video footage](#) have already been published.

Moreover, [gruesome photos of Mowi's salmon farms and its competitors](#) have been routinely published via the Scottish Government's 'Case Information' (currently up to February 2020).



Scottish Salmon Watch's [appeal to the Information Commissioner in April 2020](#) also stated:

APHA is clearly placing their "working relationship" with salmon farming companies ahead of their statutory priorities with respect to animal welfare and policing the Animal Health & Welfare (Scotland) Act 2006 in particular. Scottish Salmon Watch strongly believes that commercial confidentiality cannot be permitted to thwart transparency and public accountability.

Whatever the reasons for APHA's abject failures to properly inspect salmon farms and police welfare laws (Corin Smith's '[An Autopsy Of An All Clear](#)' is illuminating in that regard), Scottish Salmon Watch asks the Information Commissioner to overturn APHA's FOI refusal.

It is not APHA's job to "verify the photos" from third parties. Surely it is APHA's job to get their hands dirty and take photographs and video footage of welfare abuse on salmon farms themselves (as Scottish Salmon Watch and others have done)?

In conclusion, Scottish Salmon Watch urges DEFRA to investigate how APHA 'inspects' salmon farms. It is a damning indictment of the current system of surveillance and inspection that systemic and endemic welfare abuse is being permitted to slip through the net.



Don Staniford

@TheGAAIA

...

'Extreme Activists' publish extremely damning photos of welfare abuse inside [@rspcaassured](#) salmon farms tinyurl.com/8uprc25d [@SSPOsays](#) [@ciwf](#) [@onekindtweet](#) [@scotseafarms](#) [@ScotlandMowi](#) [@GriegShetland](#) [@salmon_scottish](#) [@CookeScotland](#) [@APHAgovuk](#) [@marinescotland](#) [@tavishscott](#) [@scotgp](#)



7:52 AM · Apr 20, 2021 · Twitter Web App

Scottish Salmon Watch encourages you to read the recent report – “[Underwater Cages, Parasites & Dead Fish](#)” – and judge for yourself whether welfare abuse of farmed salmon is being properly scrutinized across Scotland.



Don Staniford
@TheGAAIA



A new report - "Underwater Cages, Parasites & Dead Fish" - featuring welfare abuse on salmon farms is a must read!

tinyurl.com/ak6d282r

Stop salmon suffering by banning salmon farming in #Scotland NOW! @ciwf @onekindtweet @CIWF_EU @media_ciwf @rspcaassured @SSPCA_Mike @scotgp



2:47 PM · Mar 23, 2021



Yours sincerely,

Don Staniford
Director, Scottish Salmon Watch

Cc:

Chris Hadkiss, Chief Executive, APHA: enquiries@apha.gov.uk

APHA Scotland: APHA.Scotland@apha.gov.uk

Scottish Government Agriculture and Rural Economy Directorate: animal.health@gov.scot

Scottish Animal Welfare Commission: SAWC.Secretariat@gov.scot

Scottish Parliament Cross Party Group on Animal Welfare:

Christine.Grahame.msp@parliament.scot and Karen.Coe@parliament.scot

Minister for Rural Affairs and the Natural Environment (Ben Macpherson):

scottish.ministers@gov.scot

Cabinet Secretary for Rural Economy and Tourism (Fergus Ewing): scottish.ministers@gov.scot