



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.

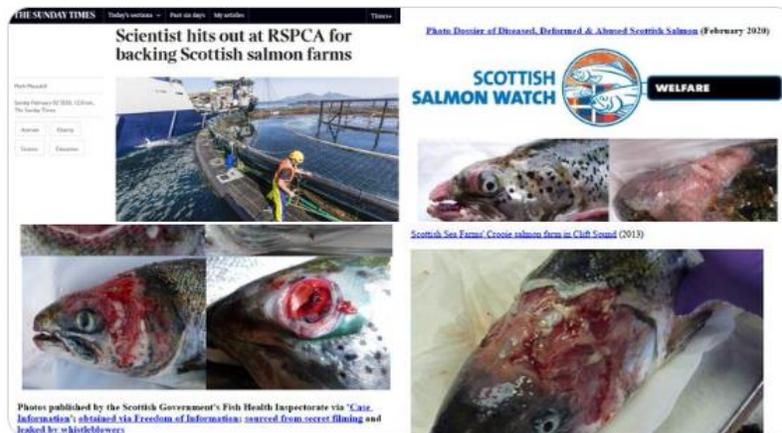
For example, APHA 'inspectors' do not take photos during 'inspections' of salmon farms unlike inspectors employed by the Scottish Government's Fish Health Inspectorate who often accompany APHA on inspections.



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](#)



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
Site No: F31287
Inspection: [REDACTED]

Date of Case: 06/07/2020
Site Name: [REDACTED]
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
Kilniver
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:

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](#)

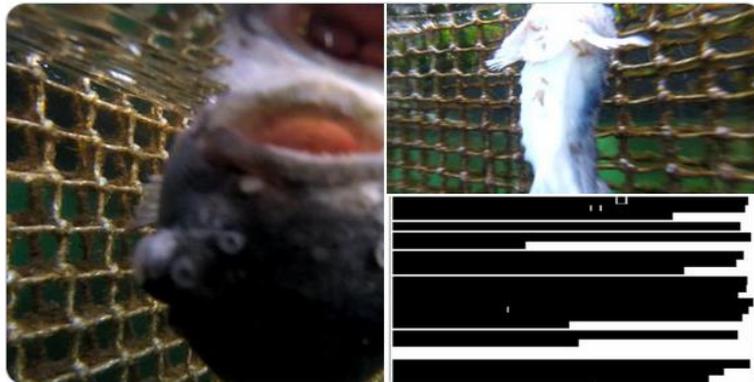
Another [FOI disclosure by APHA in March 2020](#) provides further evidence of incompetence and negligence by APHA in relation to salmon farm 'inspections' (or not as the case may be) as well as worrying censorship (see point 3 for further details).



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](#)

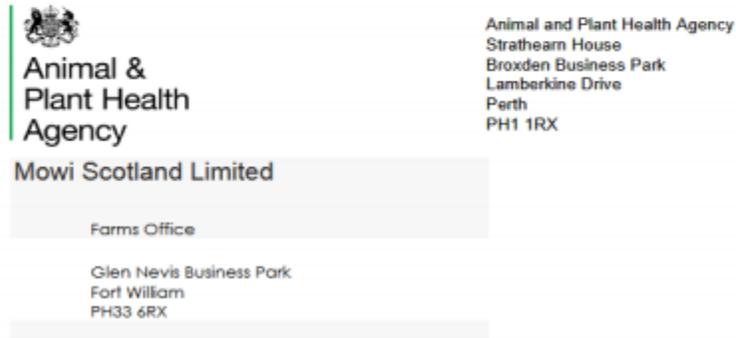


 Roseanna Cunningham  and 8 others

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 [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.

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:				
Site No:	FS0468	Site Name:	Loch Tralaig			
Business No:	FB0134	Business Name:	Kames Fish Farming Ltd			
Case Types:	1 WEL	2	3	4	5	6
Water Temp (°C):	13.6	Thermometer No:	Site	FHI 045 completed		
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.”



Animal and Plant Health Agency
Access to Information Team
Woodham Lane
New Haw
Addlestone
Surrey
KT15 3NB

enquiries@apha.gov.uk

www.gov.uk/apha

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):

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