



Brian Johnson
Chief Executive
[Maritime & Coastguard Agency](#)
infoline@mcga.gov.uk

12 September 2019

Dear Mr Johnson,

[Navigation Concerns re. Salmon Farms Operating in Public Waters](#) [- the Fish Farm Menace & Threats to Public Safety](#)

Scottish Salmon Watch is writing in respect of the [Maritime & Coastguard Agency's responsibility for the "safety of everybody in a vessel in UK waters" and the "environmental safety of UK coast and waters"](#). Our experiences on 1 September 2019 in the waters around Shuna raise serious concerns about safety and the reckless operations of [salmon farming giant Mowi](#) in particular who we believe ignored the '[rules of the road](#)'.



Scottish Salmon Watch is concerned that Mowi's intimidation and menacing behaviour, if left unchecked, will escalate and cause further safety hazards. With more protests and sampling close to salmon farms planned for the coming months ([predicted by Mowi's Health Manager to be a "painful" time for disease](#)), Scottish Salmon Watch is worried for the safety of our kayaks operating in public and navigable waters.

On 1 September 2019, we were shadowed so closely by Mowi's motor powered vessels in our small kayak that we felt unsafe in public and freely navigable waters.



Our one-person kayak was dwarfed by Mowi power boats [deliberately and dangerously blocking our safe navigation through public waters](#) (the Round Shuna pursuit yacht race was taking place during our visit). Mowi repeatedly drove their motor boats into the path of our kayak and did not give way as is the custom under the maritime code.





You can read more about our concerns including video footage [online here](#).



Here's a [summary video report](#) of our protests over the weekend of 31 August & 1 September 2019.



Despite Scottish Salmon Watch's [repeated requests to "avoid unnecessary confrontation"](#), Police Scotland failed to meet prior to the protests or monitor events on the day allowing Mowi to act in an unchecked and menacing manner. On a normal Sunday we believe that Mowi may not have had any boats working at the sites but on 1 September 2019 Mowi had several motor boats operating not as work boats but with the specific aim of harassing, blocking and intimidating Scottish Salmon Watch's ['Citizen Science'](#).





Scottish Salmon Watch [raised our concerns with Police Scotland via letters dated 6 August 2019 and 21 July 2019](#) (enclosed below for easy reference) but they sadly chose not to witness events on 1 September 2019 and chose not to take up our offer of a police liaison to minimize confrontation. Two officers from Police Scotland did monitor our [protest on 31 August 2019](#) but lurked in the bushes and chose not to get wet.





Previously in July 2019, Police Scotland acted as a private security firm for salmon farms wrongly ordering us off the public and navigable waters surrounding a salmon farm.



Read more via:

[The Ferret: "Police Scotland acted as 'private security' for fish farm, claims campaigner"](#)
[Police Scotland Acting as Private Security Enforcement for Norwegian-Owned Scottish Sea Farms?](#)

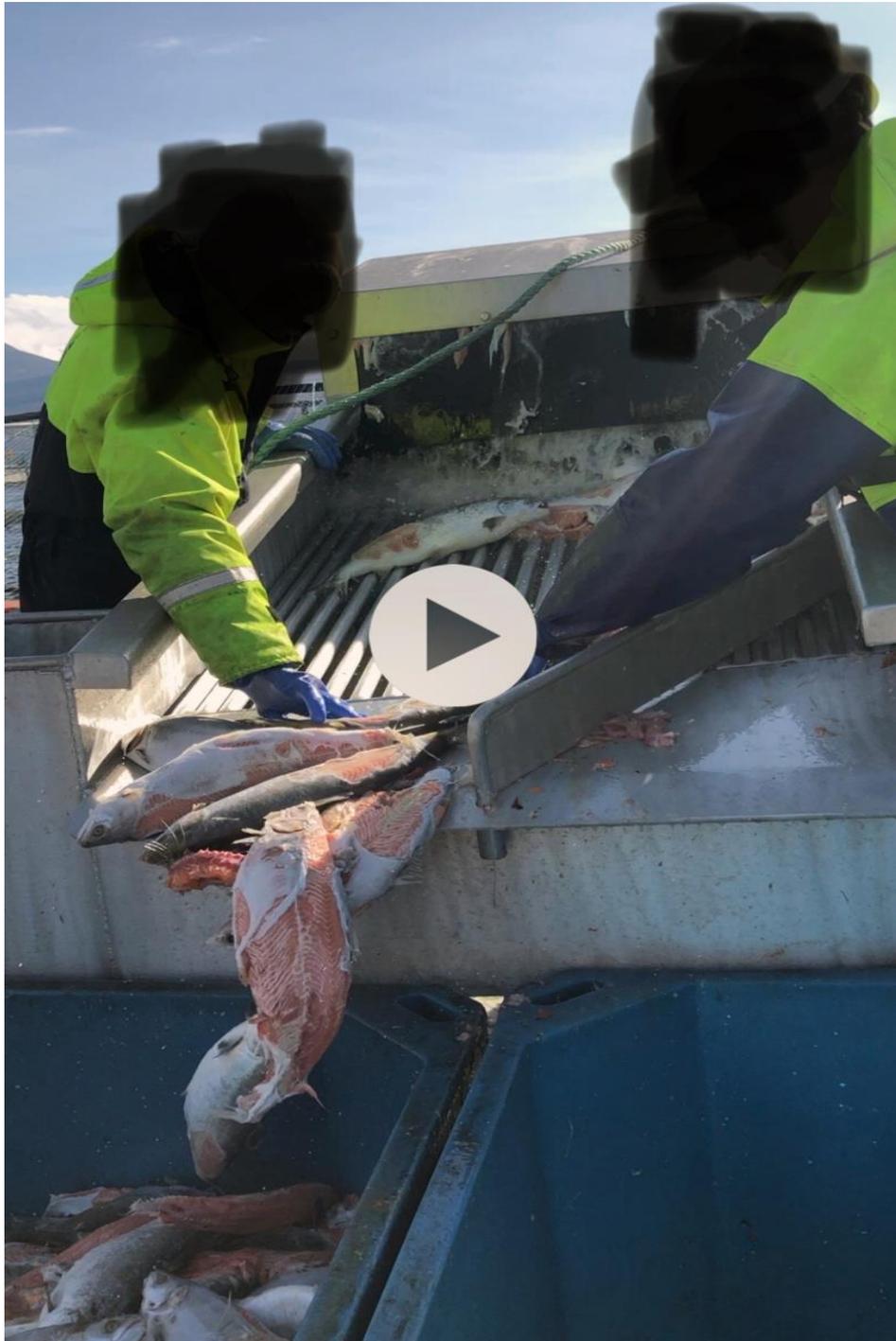
Some may view events on 1 September 2019 as darkly comic with shades of [Dastardly & Muttley's 'Stop the Pigeon'](#) cartoon.



However, the safety of kayaks (and swimmers) navigating through public waters is no laughing matter even if protestors are dressed as lobsters, harbour porpoises, seals and salmon.



It is certainly a bad joke that [salmon farmers want kayakers to keep 15 metres away from salmon farms for fear of stressing factory farmed salmon.](#)



Read more via "[Don't stress our fish, campaigners told](#)"

When Scottish Salmon Watch visited Mowi salmon farms on 1 September 2019 there were many power boats with huge motors operating throughout the salmon farm lease area - at one point there was even the deliberate revving of engines to drown out the sound of our [video recordings](#). If Mowi seriously cared about animal welfare then they would not cram the

'King of Fish' in [disease-ridden battery cages](#) suffering from [mass mortalities](#) and [welfare abuse](#).



Scottish Salmon Watch believes that salmon farms are in [breach of the law](#) - namely the [Animal Health & Welfare \(Scotland\) Act 2006](#) - specifically in relation to "[Unnecessary Suffering](#)", "[Cruel Operations](#)" and "[Ensuring Welfare of Animals](#)".



As long as the [Scottish Government fails to conduct unannounced on-the-spot inspections of salmon farms](#), Scottish Salmon Watch will continue to monitor salmon farms including [sampling sewage waste effluents from the vicinity of salmon cages](#).



It is another bad joke that the [Scottish Government and Scottish Parliament classify samples of sewage effluent from salmon farms a "biosecurity risk"](#) yet salmon farms are permitted to discharge of [huge quantities of untreated effluent](#) (which [may include infectious diseases, pathogens, bacteria and viruses including Piscine Reovirus](#)) into the open ocean.



Scottish Salmon Watch hopes that the Maritime & Coastguard Agency polices salmon farms better than Police Scotland, the Scottish Government, the Scottish Environment Protection Agency and the Animal & Plant Health Agency. And we can only hope that salmon farming operators in motor boats give way to kayaks navigating in public waters and do not act in a reckless and dangerous manner. Prior to our next visits to salmon farms we would be only to happy to meet to discuss any concerns. If you have any questions please do not hesitate to contact me.

Yours sincerely,

Don Staniford

[Director, Scottish Salmon Watch](#)

Email: salmonfarmingkills@gmail.com

Tel: 07771 541826

Cc:

Secretary of State for Transport (Grant Shapps MP): grant.shapps@dft.gsi.gov.uk

Police Scotland: Contactus@scotland.pnn.police.uk

Cabinet Secretary for Justice (Humza Yousaf): scottish.ministers@gov.scot

Animal & Plant Health Agency: APHA.Scotland@apha.gsi.gov.uk

Scottish Government Fish Health Inspectorate: ms.fishhealth@gov.scot

Scottish Environment Protection Agency: terry.ahearn@sepa.org.uk

Crown Estate Scotland: Alex.Adrian@crownestatescotland.com



Police Scotland: Contactus@scotland.pnn.police.uk
Cabinet Secretary for Justice (Humza Yousaf): scottish.ministers@gov.scot
Animal & Plant Health Agency: APHA.Scotland@apha.gsi.gov.uk
Scottish Government Fish Health Inspectorate: ms.fishhealth@gov.scot
Scottish Environment Protection Agency: terry.ahearn@sepa.org.uk
Crown Estate Scotland: Alex.Adrian@crownestatescotland.com
Health & Safety Executive: Penny.Falconer@hse.gov.uk
Marine Concern: mc@marineconcern.com

6 August 2019

Dear Sir/Madam,

Protocol & Guidelines for Filming Salmon Farms

Further to [Scottish Salmon Watch's letter of 21 July](#), would it be possible to draft a protocol and guidelines for filming with respect to salmon farms?

Scottish Salmon Watch is keen to ensure that specific events planned for the weekend of 31 August/1 September proceed safely and legally. It is disappointing that our letter of 21 July (re-enclosed for easy reference and available [online here](#)) has not received a single reply especially since the issue warranted recent media coverage via [The Ferret](#) (2 August).



Please note that further details on our protests on 31 August and 1 September around salmon farms on the West coast of Scotland are detailed via:

[Make a Splash for Salmon, Cetaceans, Lobsters & Seals!
Swimming \(& Paddling\) Against the Rising Tide of Salmon Farming](#)

A poster publicising the events is detailed below ([available online here as a PDF](#)).



Make a Splash for Salmon

Cetaceans Lobsters and Seals

Come and join in the fun
and tell the Norwegian
Salmon farming companies
that we don't want their
toxic fish farms in our
clear and clean
Scottish lochs and seas

If you're a good swimmer
or have a boat or kayak
come along and make
your voice heard

31st August - Dunstaffnage (Oban) 10 a.m.
Shuna, Loch Linnhe (Linnhe Marina) 2 p.m.

1st September - Isle of Shuna salmon farms
(near Craobh Haven) at noon

<https://donstaniford.typepad.com/my-blog/2019/07/make-a-splash-for-salmon-cetaceans-lobsters-seals.html>



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This was [Tweeted](#) earlier today:

 **Don Staniford**
@TheGAAIA

Make a splash for salmon, cetaceans, lobsters & seals
tinyurl.com/y6au4cqy @TheSoundOfJura
@ArranCoast @SealScotland @SeaShepherdScot
@ciwf @SumOfUs @scotgp @ScotSalmonTank
@CreelScff @salmontr @ScotLINK @crab_welfare
@whalesorg @HWDOT_org @SealifeA @onekindtweet
@TheOpenSeas



Make a Splash for Salmon
Cetaceans Lobsters and Seals

Come and join in the fun
and tell the Norwegian
Salmon farming companies
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Scottish lochs and seas

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SCAN ME

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11:44 AM · Aug 6, 2019 · Twitter Web App

And [re-Tweeted](#) to Police Scotland, the Crown Estate, SEPA, HSE, Marine Scotland as well as the salmon farming companies concerned (except Kames who do not appear to be on Twitter):



Don Staniford
@TheGAAIA

Would you like to draft a protocol & guidelines for filming with respect to salmon farms?
tinyurl.com/y4aox9es @policescotland @APHAgovuk
@marinescotland @ConcernMarine @SSPOsays
@ScottishEPA @H_S_E @ArranCoast See you soon!
@MowiScotlandLtd @scotseafarms @salmon_scottish



Don Staniford @TheGAAIA · 4h

Make a splash for salmon, cetaceans, lobsters & seals tinyurl.com/y6au4cqy
@TheSoundOfJura @ArranCoast @SealScotland @SeaShepherdScot @ciwf
@SumOfUs @scotgp @ScotSalmonTank @CreelScff @salmontr @ScotLINK
@crab_welfare @whalesorg @HWDT_org @SealifeA @onekindtweet @TheOpenSeas



4:27 PM · Aug 6, 2019 · Twitter Web App

Scottish Salmon Watch would be happy to meet with Scottish Sea Farms, Mowi and Kames prior to the events on 31 August and 1 September if it would help allay any fears and avoid unnecessary confrontation.

This is a family friendly event where safety is paramount and to which I will be bringing my young children (4 & 5 years old).



Plans [already outlined](#) include dressing up as a lobster in a gas mask, a dolphin with ear defenders, a seal in a bullet proof vest and a salmon infested with lice.



Please note that any weapons will be inflatable proton guns or toy guns.



And please rest assured that there will be no actual chemical weapons even if we're dressed in Hazmat suits.



Sorry if I have to make this obvious point but when Scottish Salmon Watch visited the Isle of Arran to film in May we received a visit from Police Scotland who said they were responding to a tip-off from a member of the public who claimed that we were going to blow up the local school.

More details [online here](#)



If [Sergeant Johnson](#) is called to the scene again when we visit the Shuna salmon farm operated by Scottish Sea Farms in Loch Linnhe might I suggest he (and his Police Scotland colleague) take the appropriate safety precautions including wearing a life jacket.



Apparently the front of the Police Scotland boat is also not in a safe position and appears unlocked - you can see Police Scotland's flagrant abuse of health and safety [at the start of the video as the boat approaches](#).



Please also note from [my blog](#):

Howard Wood ([Goldman Environmental prize winner in 2015](#)) [Tweeted in reply](#) (15 July):



Howard Wood

@howardlwood

Following

This is a very serious issue of [@policescotland](#) attempting to deny the public right to navigate freely. This is [#Scotland](#) moving towards [#Trump](#) politics. [@HumzaYousaf](#) [@ScotGovFM](#) [@marinescotland](#) [@strathearnrose](#) [@markruskell](#)

Don Staniford @TheGAAIA

Police Scotland Acting as Private Security for Scottish Sea Farms? [vimeo.com/348103463](#) [@policescotland](#) [@scotseafarms](#) Instead of telling the public to stay out of public waterways, why doesn't the Police investigate salmon farms for breaches of welfare laws? [@JohnFinnieHI](#)

11:00 AM - 15 Jul 2019

Don Staniford [Tweeted](#) (15 July):



Don Staniford

@TheGAAIA



[@HumzaYousaf](#) Is it Scottish Government policy for Police Scotland officers to be acting as private security for Norwegian-owned companies? Surely ushering the general public away from public waters is not the job of [@policescotland](#)? vimeo.com/348103463

Don Staniford @TheGAAIA

Police Scotland Acting as Private Security for Scottish Sea Farms? vimeo.com/348103463 [@policescotland](#) [@scotseafarms](#) Instead of telling the public to stay out of public waterways, why doesn't the Police investigate salmon farms for breaches of welfare laws? [@JohnFinnieHI](#)

11:49 AM - 15 Jul 2019

Howard Wood [posted on Facebook](#) (15 July):



Howard Wood There is a much bigger issue here. It is not only Don who has been told not to approach or go near salmon feedlots. COAST were emailed by the Scottish Salmon Company a couple of years ago and told to keep away. When we replied as to what law allowed them to instruct us to keep out of the area of the feedlot they went quiet, but once again SSC reported it to the local police who came along to Lamlash pier to question us. My understanding of the law in Scotland is as long as you don't damage any feedlot gear, you have every right to be in the sea as the master of a boat, swimmer or diver. The bigger issue is the police allowing themselves to be involved when feedlot companies phone up but not being interested when environmental laws & regulations are broken. The more we can politicize this the better the chance of a fairer application of the law.

[Like](#) · [Reply](#) · 1h



Russ Cheshire [Tweeted](#) (15 July):



Russ Cheshire

@RussCheshire

Following

The toxic [#salmon](#) industry pays [@CrownEstateScot](#) mooring dues for its sites; it does not have the right to impede safe navigation in open waters.

Don Staniford @TheGAAIA

Police Scotland Acting as Private Security for Scottish Sea Farms? vimeo.com/348103463 @policescotland @scotseafarms Instead of telling the public to stay out of public waterways, why doesn't the Police investigate salmon farms for breaches of welfare laws? @JohnFinnieHI

9:19 PM - 15 Jul 2019

Ewan Kennedy [Tweeted](#) (16 July):



Ewan Kennedy

@ewankennedy

Following

Replying to [@RussCheshire](#) [@TheGAAIA](#) [@CrownEstateScot](#)

FOI sent to [@policescotland](#)



I am writing to request certain information under the terms of the Freedom of Information (Scotland) Act and/or the Environmental Information Regulations.

I would draw your attention to an exchange that took place near Apslin earlier this month, which was filmed and can be viewed here: <https://vimeo.com/348103463>

The clip shows a vessel named the Island Trader, with a Sergeant Johnson and an unnamed Police Constable aboard approaching Mr Don Staniford, who is aboard a private yacht near Apslin. You will see that Mr Staniford answers all questions put to him accurately and respectfully tries to find out what he is being accused of. I do not know the ownership of the Island Trader and whether or not she had been chartered by Police Scotland.

After stating that the spot "is not suitable for anchorage" (the yacht wasn't anchored) and that the location was in some way unsafe Sergeant Johnson states that Mr Staniford should have obtained permission from Scottish Sea Farms Limited. Towards the end of the exchange Sergeant Johnson seems to accuse Mr Staniford of theft, but he does not make an arrest, nor does he make any attempt to check whether or not Mr Staniford has stolen anything. Sergeant Johnson does not disclose if he is acting on his own initiative or in response to a complaint, perhaps from Scottish Sea Farms Limited. The statement "I don't need a regulation" is very disturbing and would be more appropriate in a police state.

I have an interest in this matter, because Mr Staniford is a friend of mine, whom I have known for many years. He is well known internationally as a campaigner against industrial fish farms, currently campaigning under <https://www.scotseafarms.org/>. I regard him as a person of total integrity.

Some time ago Mr Staniford approached me for advice, on the basis of my experience as a former solicitor and legal academic, regarding his rights to navigate on the open sea in the vicinity of fish farms. I drew his attention to the excellent discussion paper produced by the Scottish Law Commission, accessible here: https://www.scotlawcommission.scot.nhs.uk/files/94127886/2009ip113_scsfm09.pdf

The section on the public rights to navigate is brief and can be quoted in full:

"Navigation 4.11

The public has a right of navigation on the sea and public (DIR) lochs and rivers.

135 The right is basically one of passage from A to B.

136 It does not give the public the right to sail over "every square inch" of the surface of the sea.

137 Thus, for example, the seabed can be used for fish farming provided it does not amount to a material interference with the right of passage. The fact that this use of the seabed is a nuisance or inconvenience is not enough to constitute material interference.

138 The public right of navigation will prevail over a use of the sea or sear that is a hazard or danger to vessels."

I advised Mr Staniford that he was entirely within his rights to navigate close to fish farms, but that if he entered upon an actual structure or created a nuisance he could be liable to consequences under civil law but not criminal law. In the filmed interview there "is no suggestion that he had done either of those things, even if it were the responsibility of Police Scotland to seek to enforce

only one of a number of very concerned individuals who are currently exercising their rights to know about what is going on in the waters of the Scottish West coast. Recent examples have included dead and diseased salmon on several farms, taken by a campaigner who swam to the sites and vessel showing illegal dredging in a protected area. These clips have been shown on national television to the public of what is being done to the seabed, which the Crown is legally charged with holding in trust. Charities have picked up on them and there are currently accusations of cruelty and neglect with P

saying that if Marine Scotland and SEPA made inspections themselves, or took action when called do with the dredging incident, apparently because it was night time) members of the public would and sometimes risk their lives doing so.

and that I find the possibility that Police Scotland may have now taken on the role of private water y disturbing. It suggests that instead of investigating cases of cruelty you are conspiring to preven

to as follows:

Island Trader an asset of Police Scotland? If not from whom had she been chartered? What was time and charter fees?

Police Scotland agree with the above statement of the law in relation to the public right to navigat

ormal Police Scotland procedure when interviewing a member of the public not to state why he is ply "I don't need a regulation"?

Police Scotland undertaken to work privately as a security guard for Scottish Sea Farms Limited? Ijeant Johnson's trip?

heard from you.

Kennedy

2:39 PM - 16 Jul 2019

Here's the [FOI request to Police Scotland](#):

Dear Sirs

I am writing to request certain information under the terms of the Freedom of Information (Scotland) Act and/or the Environmental Information Regulations.

I would draw your attention to an exchange that took place near Appin earlier this month, which was filmed and can be viewed here: <https://vimeo.com/348103463>

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I have an interest in this matter, because Mr Staniford is a friend of mine, whom I have known for many years. He is well known internationally as a campaigner against industrial fish farms, currently campaigning under <https://scottishsalmonwatch.org/>. I regard him as a person of total integrity.

Some time ago Mr Staniford approached me for advice, on the basis of my experience as a former solicitor and legal academic, regarding his rights to navigate on the open sea in the vicinity of fish farms. I drew his attention to the excellent discussion paper produced by the Scottish Law Commission, accessible here: https://www.scotlawcom.gov.uk/files/9412/7892/7069/dp113_foreshore.pdf

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The public has a right of navigation on the sea and public (tidal) lochs and rivers.

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137 Thus, for example, the seabed can be used for fish farming provided it does not amount to a material interference with the right of passage: the fact that this use of the seabed is a nuisance or inconvenience is not enough to constitute material interference.

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I advised Mr Staniford that he was entirely within his rights to navigate close to fish farms, but that if he entered upon an actual structure or created a nuisance he could be liable to consequences under civil law but not criminal law. In the filmed interview there is no suggestion that he had done either of those things, even if it were the responsibility of Police Scotland to seek to enforce private rights.

Mr Staniford is only one of a number of very concerned individuals who are currently exercising their rights to navigate in order to pick up evidence about what is going on in the waters of the Scottish West coast. Recent examples have included footage of severely distressed and diseased salmon on several farms, taken by a campaigner who swam to the sites and video shot at night from a private vessel showing illegal dredging in a protected area. These clips have been shown on national television and have helped to inform the public of what is being done to the seabed, which the Crown is legally charged with holding in trust for all of us. Animal cruelty charities have picked up on them and there are currently accusations of cruelty and neglect with Police Scotland for investigation.

It goes without saying that if Marine Scotland and SEPA made inspections themselves, or took action when called upon to do so (as they refused to do with the dredging incident, apparently because it was night time) members of the public would not be motivated to gather evidence and sometimes risk their lives doing so.

You will understand that I find the possibility that Police Scotland may have now taken on the role of private watchmen for aquaculture very disturbing. It suggests that instead of investigating cases of cruelty you are conspiring to prevent the evidence coming to light.

My questions are as follows:

- 1 Is the Island Trader an asset of Police Scotland? If not from whom had she been chartered? What was the total cost including police time and charter fees?
- 2 Does Police Scotland agree with the above statement of the law in relation to the public right to navigate. If not please explain.
- 3 Is it normal Police Scotland procedure when interviewing a member of the public not to state why he is being questioned but to state simply "I don't need a regulation" ?
- 4 Has Police Scotland undertaken to work privately as a security guard for Scottish Sea Farms Limited? If not what was the purpose of Sergeant Johnston's trip?

I look forward to hearing from you.

Ewan Graham Kennedy

Read more via "[Police Scotland Acting as Private Security Enforcement for Norwegian-Owned Scottish Sea Farms?](#)"

Finally, Scottish Salmon Watch have invited a former police officer, now retired, who lives locally and knows local waters to act as an observer and police liaison on 1 September. He is aware of previous events concerning fish farms and is admin for Marine Concern (Mark Carter is copied into this letter and his web-site is www.marineconcern.com). Mark is up to date on relevant legislation especially when dealing with marine wildlife and maritime issues.

Yours sincerely,

Don Staniford

[Director, Scottish Salmon Watch](#)

Tel: 07771 541826



Police Scotland Wildlife Crime Unit: Contactus@scotland.pnn.police.uk
Animal & Plant Health Agency: APHA.Scotland@apha.gsi.gov.uk
Scottish Government Fish Health Inspectorate: ms.fishhealth@gov.scot
Scottish Environment Protection Agency: terry.ahearn@sepa.org.uk
Crown Estate Scotland: Alex.Adrian@crownestatescotland.com

21 July 2019

Dear Sir/Madam,

Protocol & Guidelines for Filming Salmon Farms

Would it be possible to draft a protocol and guidelines for filming with respect to salmon farms?

During 2018 and 2019 Scottish Salmon Watch has been filming at salmon farms and we are planning further filming in the coming weeks with a 'Salmonwatch' weekend of citizen science and surveillance scheduled for 31 August & 1 September.



Read more via:

['Salmonwatch' Exposes Scottish Salmon's Dirty Secrets](#)

[Shocking Video Footage from Mowi's 'Bay of the Dead Heads' \(Bagh Dail nan Ceann\)](#)

[Photos of Secret Filming at Scottish & Irish Salmon Farms](#)

[Campaigners call for urgent investigation of all Scottish salmon farms](#)

['Salmonwatch' Launched in Scotland](#)

[Biosecurity Precautions for Filming Salmon Farms](#)

Scottish Salmon Watch will re-visit [Mowi](#) salmon farms at [Poll na Gille](#) ([rated the worst in Scotland from a welfare perspective](#)) and [Bagh Dail nan Ceann](#); the [Kames](#) salmon farm at [Rubh an Trilleachain in Shuna Sound](#) ([a site already exhibiting welfare problems](#)); [The Scottish Salmon Company](#) in [Loch Fyne](#); and [Scottish Sea Farms](#) sites at [Dunstaffnage in the Firth of Lorne](#) and [Shuna in Loch Linnhe](#).



When Scottish Salmon Watch visited the latter on 3 July we were [ordered by Police Scotland to leave the area](#) (we were not even inside the lease area at the time) and seek permission of the [privately owned Norwegian company Scottish Sea Farms](#) to be in public waters.

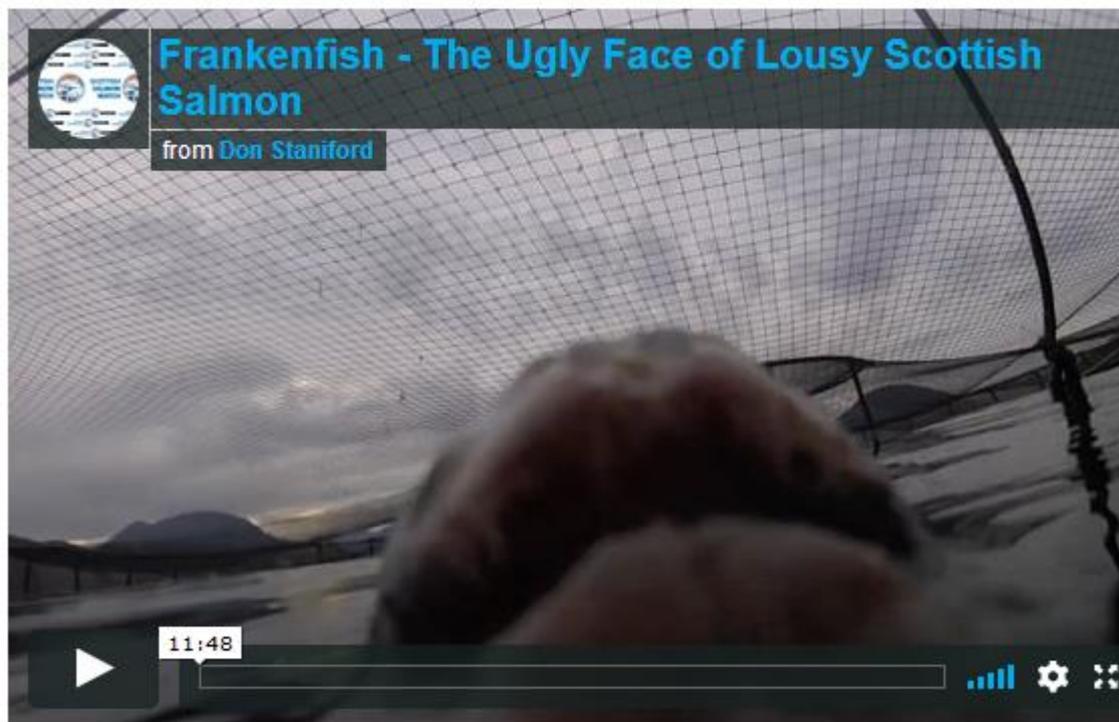


Read more via [Police Scotland Acting as Private Security Enforcement for Norwegian-Owned Scottish Sea Farms?](#)

When Scottish Salmon Watch [filmed in May 2019](#) at Mowi's [ASC-certified](#) salmon farm in Loch Leven, I understand that Mowi filed a report with Police Scotland.



When Scottish Salmon Watch [filmed at The Scottish Salmon Company's salmon farm in Loch Shieldaig](#) in June 2019 we filed two complaints with Police Scotland, APHA and Marine Scotland (read [online here](#) and [online here](#)).



It is known via [data released by the Scottish Government via Freedom of Information](#) that over half of farmed salmon tested in 2018 and 2019 were positive for Piscine Reovirus (PRV). Hence we will be testing water samples and any dead fish we find floating in public waters.



Scottish Salmon Watch would like to engage with the appropriate authorities to establish a safe and bio-secure zone for filming, diving and sampling. We believe we have followed bio-security and disinfectant guidelines to the letter and last year [sought the advice of the Scottish Government](#) who advised following the [SSPO's Code of Good Practice](#) and the [Disinfectant Guide](#).

However, there appears to be a grey area in terms of proximity and [Police Scotland's recent advice](#) (which Scottish Salmon Watch has questioned) with respect to requiring explicit permission from the salmon farming company raises serious concerns. Indeed, you could argue that by blocking navigation between rows of cages with plastic feed pipes that salmon farms are infringing upon public rights in navigable waters.



Scottish Salmon Watch has specific concerns with respect to [firearms being used on site to kill seals](#) and requests that there is a Scottish-wide cease-fire on salmon farms over the weekend of 31 August/1 September. I plan to be in the water in close proximity to salmon farms wearing a seal suit so would appreciate not being shot at.



Scottish Salmon Watch also has concerns regarding the [use of toxic chemicals at salmon farms](#) and [via well boats](#). Scientific research [published by the Scottish Aquaculture Research Forum](#) in 2016 showed how [Emamectin benzoate is lethal to lobsters](#).



Data published by SEPA shows that salmon farmers have [reported the use of Emamectin, Azamethiphos and Deltamethrin during 2019](#). However this data is now some four months out of date with information only available up to March 2019.

Could advance notice be given in terms of which salmon farms are using toxic chemicals over the next few months so that Scottish Salmon Watch can take necessary precautions?

For example, we know that [Mowi's Bagh Dail nan Ceann salmon farm](#) has used multiple doses of toxic chemicals since fish were first stocked in September 2018. It reported [the use of the lobster-killing Azamethiphos in March 2019](#).

Fish Farm Monthly Biomass and Treatments Details	
Year	2019
Month	March
Submitted By	Mowi Scotland Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	2027
Biomass Exceedance (tonnes)	0
Feed (kg)	474947
Mortalities (kg)	4869.0257201657
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	2400.0000357628
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0

Data supplied by SEPA on 19/06/2019

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map

Data supplied by SEPA on 19/06/2019

And [again at the same Mowi salmon farm in November 2018](#):

Fish Farm Monthly Biomass and Treatments Details	
Year	2018
Month	November
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	513
Biomass Exceedance (tonnes)	0
Feed (kg)	223452
Mortalities (kg)	1583.1158476454
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	400.0000059605
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0
Data supplied by SEPA on 19/06/2019	

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map
Data supplied by SEPA on 19/06/2019	

And lobsters in the vicinity of Mowi's salmon farm were [subjected to another dose of the toxic Azamethiphos in October 2018](#):

Fish Farm Monthly Biomass and Treatments Details	
Year	2018
Month	October
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	295
Biomass Exceedance (tonnes)	0
Feed (kg)	148604
Mortalities (kg)	2612.8177097660
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	400
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0
Data supplied by SEPA on 19/06/2019	

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map
Data supplied by SEPA on 19/06/2019	

As well as a [dose of the toxic lobster-killer Emamectin benzoate in September 2018](#):

Fish Farm Monthly Biomass and Treatments Details	
Year	2018
Month	September
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	107
Biomass Exceedance (tonnes)	0
Feed (kg)	35117
Mortalities (kg)	3369.4320135666
Sealice Treatments Used	
Sealice Treatment Product	Quantity Used (grams)
Azamethiphos	0
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	46.40
Teflubenzuron	0

Data supplied by SEPA on 19/06/2019

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map

Data supplied by SEPA on 19/06/2019

At which salmon farms is Mowi and other salmon farming companies planning to use toxic chemicals during August and September? Would it be possible to cease using toxic chemicals for the weekend of 31 August/1 September?

In conclusion, Scottish Salmon Watch would appreciate your thoughts on drafting a protocol and guidelines for filming with respect to salmon farms. We appreciate that this is a controversial subject but we want to ensure safety and bio-security as well as enshrine ancient public rights to water and navigation.

To avoid confrontation and litigation, I would be happy to meet with the Police Scotland and representatives from Mowi, The Scottish Salmon Company, Kames and Scottish Sea Farms prior to filming, sampling, swimming and diving during the weekend of 31 August/1 September.

Yours sincerely,

Don Staniford

[Director, Scottish Salmon Watch](#)