

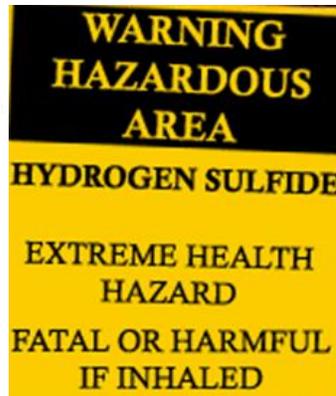


14 November 2022

Bakkafrost is Dead in the Water in Scotland!

- A [FOI disclosure by the Scottish Government](#) (11 November 2022) exposes the public health dangers of an “explosive” feed barge which leaked toxic Hydrogen Sulphide gases off Portree (the barge is ‘expected’ to be salvaged this month & towed to Kishorn – almost a year since it sank on 26 November 2021 – otherwise Bakkafrost will require a licence) [1]

- “Should the barge explode mitigations are in place to protect public health,” [wrote Marine Scotland in August 2022](#) before offering up Portree High School as a rest centre “should the gas come to shore” and Highland Council offices as an ‘emergency response centre’. “Public health will advise that people close windows and doors as well to protect themselves should the gas reach shore”



- Bakkafrost ([called The Scottish Salmon Company until June 2022](#)) has left the barge to rot on the seabed for nearly a year (it sank during Storm Arwen on 26 November 2021 with only a [brief report – naming the company but not the exact location – in The Oban Times](#)).

Instead of pumping out the feed as a safer salvage option – described as “extremely expensive - Bakkafrost [continued to farm at Portree until June 2022](#) rather than harvesting out immediately (fish at Portree Outer salmon farm were [moved off site in January 2022](#))



- [FOI disclosure by SEPA in November 2022](#) revealed that a marine chemist found Hydrogen Sulphide “concentrations of 55,000 ppm which puts the gas into explosive range” (as [detailed in a September 2022 report by salvage experts Marine Masters](#) – an updated version of the report was [circulated by Bakkafrost to SEPA, Fire Scotland, NHS Scotland, Police Scotland and other government agencies on 6 September 2022](#))

Hoses, pumps, and two IBCs were supplied to allow the relief of the unknown pressure within the silos as there was concern over the possibility of an uncontrolled release of the pent up gases and oils or structural harm to the barge as cracks were identified by the emission of the gases. During the relief of the gas and oils from the silos it became apparent that the gases were toxic in composition with Hydrogen Sulphide (H₂S) and Methane (CH₄) detected. During diving operations, a gas sample was collected directly from the sunken barge itself, and analysed by a Marine Chemist which provided the results of the presence of H₂S in concentrations of 55,000 ppm which puts the gas into explosive range but only when oxygen is introduced as levels in the silos for O₂ are very low at 2.4% volume.

Actual readings from silo test below -

O2	:2,4 %vol
CO	:1580 PPM
H2S	:5,5 % vol (55000 PPM)
LEL	: 100 % (not accurate O2 <8 % vol)
VOC	: 231 PPM (PID)

Please note the lower explosion limit of H₂S is 4,3 % vol

- **Bakkafrost and salvage experts Briggs Marine (who left in August 2022) are “involved in legal proceedings”** [states letter from Scottish Government dated 8 November 2022](#) [2]
- **“The reason for our departure was due to a commercial dispute regarding payment”** stated Briggs Marine in an email to Scamon Scotland dated 8 November 2022 [3]
- **“It is expected that the barge will be lifted to the surface during November 2022”** [said the Maritime & Coastguard Agency in a FOI reply to Scamon Scotland on 1 November 2022](#).
“The MCA and other environmental stakeholders will continue to monitor the operation until its full completion. The owners of the barge, Bakkafrost, continue to lead the recovery operation, with assistance and engagement from all other stakeholders as appropriate. The Secretary of State’s Representative for Maritime Salvage & Intervention has been engaged in the process from the outset and is also monitoring the recovery operation”
- **“Our feed barge at Portree sunk last night”** [stated Bakkafrost on 27 November 2021 in an email to HM Coastguard](#) “The barge appears to have gone straight down to the seabed and is still within its mooring area. There should be no danger to other boats providing they stay out with our mooring area”

- “The barge reportedly sank on its moorings, and has impacted the seabed substrate (reportedly sand/mud) at an angle and is submerged approx. 800mm,” [wrote HM Coastguard in December 2021](#). “The following images give you an indication of what the barge looked like before it sank – construction is largely concrete”



- [FOI disclosure by the Scottish Government](#) reveals a licence is required if the sunken barge is not lifted up before the end of November 2022 (i.e. within a year of the sinking). “I can confirm that no licence will be required for recovery works if carried within 1 year” [wrote Marine Scotland in an email in January 2022](#) “We do recommend issuing a Notice to Mariners to inform other users that the works will be carried out”

- Bakkafrost avoided the “extremely expensive” salvage option of removing the feed prior to lifting which would have “ensured minimal chance of large nutrient dump and eutrophication issues” [stated an email from HM Coastguard in January 2022](#)

“Three options which are being discussed and prepared for tender” [wrote HM Coastguard in December 2021](#) “Option 1 to stop any further feed oil being released, mobilise the plan to lift the barge as soon as practicable (fish stock welfare needs to be considered); Option 2 monitor and plan to remove the barge in March/April if possible; Option 3 plan the removal of the feed, look to recover the barge in March/April. Current preference of

Scottish Salmon [Bakkafrost] would be to seal the barge as planned then lift the barge out of the water and take it to a facility to have the barge assessed and waste feed etc removed to reduce the risks associated with onsite removal”

- “All the info for the recovery tender has been passed to our insurers salvage expert and is being sent out to multiple companies” [stated Bakkafrost in December 2021](#) “Once we have these plans and costs back I will fill you in on the chosen method and company”

- “In terms of the feed, I had a quick chat with [redacted] and I believe there have been issues in past incidents where the feed has become solidified and much more difficult to deal with following water ingress however I assume this has been considered by the operator in deciding to leave it in situ?” [wrote Marine Scotland’s ‘Spill Response Team in December 2021](#) “Have we seen any plans or considerations with regards to this?”

- “I take it when the feed breaks down if there is any leakage of marine oils from the feed this would constitute pollution and we are required by an enforcing authority to contain and remove the contamination?” [wrote Bakkafrost in an email to HM Coastguard in December 2021](#) “Feel free to call me if required. The feed has started to show signs of breaking down and I have arranged for an environmental response vessel to mitigate any leaks before we seal the barge. But the cost is significant and we are just checking with our insurance see below email from them. I know this is probably a daft question sorry”

- Bakkafrost’s insurance company ([AON in Glasgow](#)) [wrote in an email in December 2021](#): “Assuming the PL policy is the right home noting loss circumstances the policy defines clean up as; means the cost of Remediation incurred by the Insured (or for which it is legally liable) as required by any Enforcing Authority but shall not include the costs of achieving any improvement or alteration in the condition of the land the atmosphere or any watercourse or body of water beyond that required under any relevant and applicable law or statutory enactment at the time Remediation commences It shall include the costs reasonably and necessarily incurred by the Insured or for which it is legally liable to curtail or minimise Pollution or Contamination once it has occurred to prevent further harm being caused but only to the extent required by any Enforcing Authority I would emphasise required by and therefore your ability to evidence this point”

- In May 2018, Grieg Seafood [reported financial losses of close to £1 million – “after an assumed insurance settlement” - due to raising a sunken feed barge on the Isle of Skye](#) (the feed barge sank in 2017 but was [not raised by Ocean Kinestics until late 2021](#))

- In January 2019, [a Gael Force feed barge sank at Mowi’s salmon farm near Lochboisdale](#)

- HM Coastguard [stated in an email in December 2021](#): “350 tonnes of feed onboard will be sealed into the silos and dealt with at a later time when the barge is lifted (salvors are being consulted at this time) – which is likely to be March 2022 when cages will be fallow. Given the depth and tidal flows in the area any leeching of nutrients is likely to be distributed over a relatively wide area in very small quantities”

“We have seen some early signs of feed oils reaching the surface and also identified seepage from 1 silo which we believe is the source” [stated an email in December 2021](#) (name & affiliation redacted)

“See below photos of the release” [wrote HM Coastguard in December 2021](#) “On the first picture you can see the release coming from the feed silo and in the second faintly. This appears to be coming from one feed silo only at present”



“There is a cockle bed 2.3km [redacted] from the sunken vessel, so I have sent an email just for info to Highland Council’s Environmental health team just in case anything develops” [stated an email from Food Standards Scotland in December 2021](#)

- “The incident is inside the Inner Hebrides and the Minches SAC (for harbour porpoise) and there are a few PMF records in the area but we are not too concerned at the moment given the vessel is intact” [wrote Nature Scotland in November 2021](#) “Please keep us informed re salvage”

- “Briggs Marine are looking at a method of removing the feed from the barge and those plans are ongoing” [stated an email in December 2021](#) (name & affiliation redacted). “We are seeing signs that the feed is starting to degrade hence the urgency to get the vessel to site to start sealing the barge”

- “We have appointed Briggs Marine as our contractor for the recovery of our barge at Portree” [reported Bakka Frost in an email to various government agencies in May 2022](#) “We would like to take you through the plans for recovery. The recovery at this time is looking like mid to late July”

- “As you are aware, from our ongoing correspondence with you, we have been carrying out lifting and fish feed removal works on the sunken feed barge at Portree” [wrote Bakka Frost in an email to various government agencies \(including Highland Council and the Crown Estate\) on 5 August 2022](#) “As previously advised and predicted we have readings and samples, from our contractor, that suggest that the feed remaining and sealed in the barge, has begun to naturally decompose and is producing gas. Our investigations to date would suggest that the gas is Hydrogen Sulphide. There also appears to be a small leakage of gas through the concrete wall of a feed silo. As a result of those investigations and to ensure that the issue is dealt with swiftly, we have taken the safety precaution of pausing operations, while our contractor and specialist advisors assess and determine the appropriate technical and safe operational solutions. Our advisors are making use of various risk management/guidance materials, including the internationally recognised ‘2020 Emergency Response Guidebook’. Given the nature and the scale of works undertaken to prepare for the recovery operation, we have put an exclusion zone in place and a Notice to Mariners has been issued for the site on that basis. We will now extend the active time period for the Notice to Mariners”

Method of Work		
Item	Task	Persons responsible
	NO SMOKING ALLOWED!	
	<p>Note: Project team and Vessel Master assess weather conditions and sea state are within parameters to carry out tasks.</p> <p>Maximum operational limits:</p> <p>Water current: 0.8 knots</p> <p>Surface visibility: ≤1km</p> <p>Lightning Risk: Lightning forecast within 4hrs</p> <p>Wind speed: 20 knots</p> <p>Significant wave height: 1m</p>	
	Notice to mariner's exclusion zone for operation	

This graphic ([published by Marine Masters in September 2022](#)) shows how close the “explosive” operation is to Portree (the capital of the Isle of Skye with a population of 2,000 – but with many more in Summer with tourists including cruise ships like The World which [docked in Portree on 24 August 2022](#)):

Overview of operation



- A [Facebook post by the Isle of Skye Pipe Band on 24 August 2022](#) shows ‘The World’ cruise ship moored off Portree close to the “explosive” barge with the Isle of Skye Pipe Band still playing for residents despite the explosion risk close by:



Isle of Skye Pipe Band added 16 new photos to the album: The world.

August 24 · 🌐

The [Isle of Skye Pipe Band](#) this evening had the honour of playing for the residents aboard The World. What an amazing experience for us all, luxury beyond belief and 5* service all around. Kathleen even serenaded the residents on the piano.

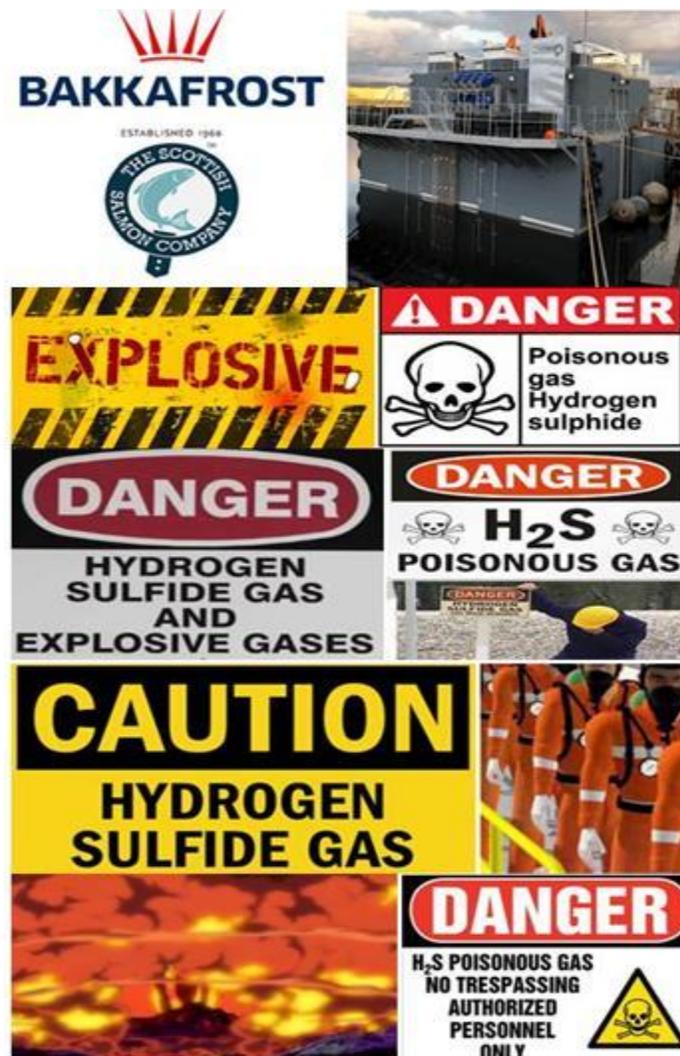
We all tried to stow away but were unfortunately kicked off!!

Images of the outside of the ship by Murdo Bain



- “It’s disappointing to note you have not included the Harbour Authority in your communications or consulted with us on the proposed exclusion zone” [wrote Highland Council’s Harbour HQ in an email to Bakkafrost on 9 August 2022](#). “Please provide us with a copy of your NoM and advise what impacts your works will have on other operations in the harbor”

- “We have had a dive team onsite today to carry out some works to prepare for the venting of the barge; sample readings were taken by our specialist contractor during this operation, which have registered high levels of H₂S within one of the sealed silos (55,000 ppm) and low levels on the site (2 ppm), due to the small amount being released at present” [wrote Bakkafrost in an email to various government agencies \(including Fire Scotland\) on 12 August 2022](#) “The team are working on a solution to introduce an inert gas during the venting portion of the operation to reduce risk. We are working to carry out this operation out as soon as possible given this latest information. Given the nature and the scale of works needing to be undertaken to prepare for the recovery operation, we will put an exclusion zone in place and a Notice to Mariners will be issued advising of this, we hope to have this updated today with assistance from the Harbour Master”



- “I just wanted to check with you that the local emergency services, namely fire and rescue for their HAZMAT expertise, and the local authority are actually aware of this newly identified issue, and they understand what it means” [wrote the Maritime & Coastguard Agency in an email to Bakkafrøst on 12 August 2022](#) “Whilst these email updates are valuable and helpful, unless you have a positive response back, it’s not possible to confirm who has read (and understood) them, and what action has been taken to mitigate any risks. If you could attempt to speak to the local representatives (fire and authority) to ensure they are in receipt of this information and understand it, that would be appreciated. You mentioned there is a local footpath not too far from site, which could be impacted, but was unsure what measures the Local Authority had put in place to deal with this. You also mentioned that cruise liners do transit near the area (although not expected until late next week), but you advised the HM is aware of this and will give notice to any cruise liners coming in to give the area a wide berth”



Don Staniford
@TheGAAIA

How many miles is the safety exclusion area around Bakkafrøst Scotland’s Portree salmon farm? When cruise ships such as 'The World' visit Skye how far away from toxic Scottish salmon do they steer? @MCA_media @H_S_E @scotgov #Toxic #Scottish #Salmon tinyurl.com/3dpm8x8t



VisitScotland and 3 others

9:44 AM · Aug 30, 2022 · Twitter Web App



Don Staniford
@TheGAAIA

Is this the sun setting on the booming tourist industry on the Isle of Skye? An exclusion zone - due to dangerous toxic gasses - around the salmon farm off Portree is not good for business! @_KateForbes @Ianblackford_MP @SkyeforAll @VisitScotland @VisitScotNews @MairiGougeon



WHFP and 4 others

10:05 AM · Aug 30, 2022 · Twitter Web App

- “I have tried to call a few numbers today to speak to people regarding our notification on Friday at the bottom of this email, I have not managed to get through to the right people or no answer from the phone lines” [wrote Bakkafrost in an email to various government stakeholders on 13 August 2022](#) “I will try to get in touch on Monday. In the meantime can you confirm that you have read and fully understood the implications of the notification on Friday by replying to this email. Please feel free to get in touch as always. I have tried to contact the council resilience team unsuccessfully, but found an email address which I have included on this email”

- [An email from Highland Council’s Harbour HQ to Bakkafrost and other stakeholders including Fire Scotland on 15 August 2022](#) asked for a “risk assessment so that we may understand the nature of the hazard and the subsequent risks, fire, explosion, toxicity, etc”:

We have read your latest NoM and as Harbour Authority have a number of concerns about public and maritime safety.

In the first instance, please provide us with:

- Your risk assessment so that we may understand the nature of the hazard and the subsequent risks, fire, explosion, toxicity, etc
- The control measures to be out into place to ensure no vessels wander inadvertently in to the exclusion zone. guard boat, lights, etc.
- The impacts risks this may pose to pedestrians on the nearby coastal path and the control measures proposed to protect them.



-An [email dated 16 August 2022 from Bakkafrost](#) to various government stakeholders including Fire Scotland, Police Scotland, NHS Scotland, Highland Council, the Scottish Government, Crown Estate Scotland, the Northern Lighthouse Board and the Maritime & Coastguard Agency attached a RAMS [Risk Assessment Method Statement] from Briggs Marine on the venting of the feed barge which included ‘emergency procedures’ and a Risk Assessment from Bakkafrost’s ‘expert’ [named redacted]

Document 34: Email communications between operational organisations regarding Subject: Portree Barge Gas Venting plan :update

From: [redacted] <[redacted]@scottishsalmon.com>

Sent: 16 August 2022 15:22

To: AHSH@sepa.org.uk; [redacted]@crownstatescotland.com; [redacted] <[redacted]@highland.gov.uk>; [redacted] <[redacted]@highland.gov.uk>; [redacted] <[redacted]@highland.gov.uk>; [redacted] <[redacted]@scottishsalmon.com>; [redacted].cldr@highland.gov.uk; Dundee fire serviceHQ <N.DundeeControl@firescotland.gov.uk>; [redacted]@mcga.gov.uk; HQ_CounterPollution@mcga.gov.uk; HQ_SOSRep@mcga.gov.uk; [redacted]@briggsenvironmental.com; [redacted] <[redacted]@mcga.gov.uk>; [redacted]@highland.gov.uk; [redacted].cldr@highland.gov.uk; [redacted] <[redacted]@nlb.org.uk>; [redacted]@mcga.gov.uk; navigation@nlb.org.uk; [redacted]@mcga.gov.uk; [redacted] <[redacted]@mcga.gov.uk>; [redacted] <[redacted]@mcga.gov.uk>; [redacted] <[redacted]@scottishsalmon.com>; [redacted]@nlb.org.uk; [redacted] <[redacted]@firescotland.gov.uk>; [redacted]

([redacted])[redacted] <[redacted]@gov.scot>; [redacted].cldr@highland.gov.uk; [redacted] <[redacted]@mcga.gov.uk>; [redacted] <[redacted]@highland.gov.uk>; [redacted]@highland.gov.uk; zone36@hmcg.gov.uk; [redacted] <[redacted]@firescotland.gov.uk>; [redacted] <[redacted]@firescotland.gov.uk>; [redacted] <[redacted]@firescotland.gov.uk>; [redacted] [redacted]@firescotland.gov.uk>; [redacted] [redacted]@consultingmarinechemist.nl>; [redacted] [redacted]@scottishsalmon.com>; [redacted] <[redacted]@briggsmarine.com>; [redacted]@scotland.pnn.police.uk; [redacted]@scotland.pnn.police.uk; [redacted]@nhs.scot; [redacted]@highland.gov.uk; [redacted]@highland.gov.uk; [redacted]@scotland.police.uk; [redacted] <[redacted]@scotland.police.uk>; [redacted] (Property and Facilities Management) <[redacted]@highland.gov.uk>; [redacted] (Planning and Environment) <[redacted]@highland.gov.uk>
Cc: [redacted] <[redacted]@mcga.gov.uk>; [redacted] <[redacted]@nhs.scot>; [redacted] <[redacted]@firescotland.gov.uk>; HIGHLAND, Hpt (NHS HIGHLAND) <hpt.highland@nhs.scot>; [redacted] (Environmental and Amenity Services) <[redacted]@highland.gov.uk>; [redacted] <[redacted]@nhs.scot>; [redacted], [redacted] <[redacted].[redacted]@scotland.police.uk>
Subject: Portree Barge Gas Venting plan :update

All

Please see attached RAMS from Briggs on the Venting and also the RA from [redacted] our expert. For discussion tomorrow.

This document is a risk assessment based on assumptions (pressure, volume, ect, ect) and weather forecast

Calculation model used : ALOHA

This document can only be used as a guideline and all data used is subject to (unforeseen) changes

The events mentioned in de RA 1 until 4 you will find back on the calculation sheet and drawing numbered M1, M1A, M2 ect ect

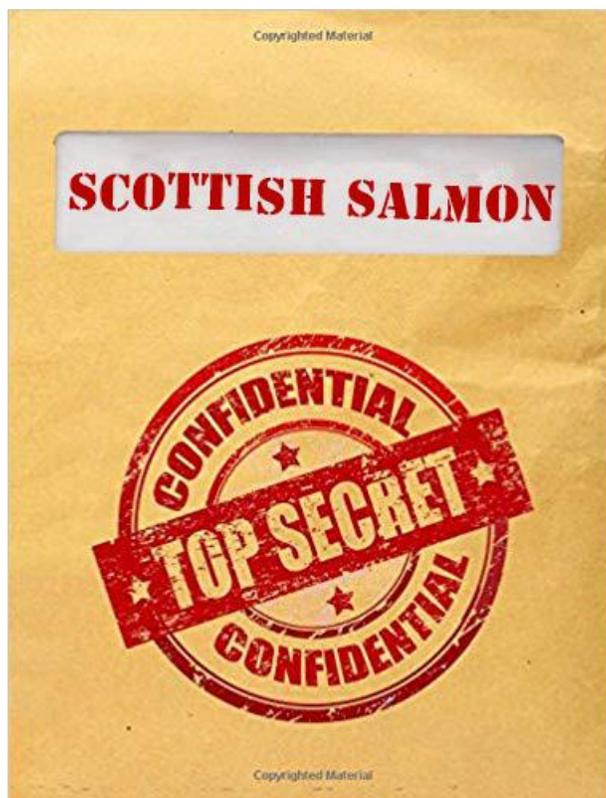
The worst case scenario is shown in the drawings NNE, SSE and ENE

Best regards / Vinarliga

[redacted]

[Note that ‘Vinarliga’ is not the name of the Bakkafrost employee sending but it means ‘Best Regards/Thanks’ in Faroese – [Bakkafrost is based in the Faroe Islands](#)]

- Sadly, neither the RAMS from Briggs Marine nor the Risk Assessment from Bakkafrost's 'expert' were disclosed by the Scottish Government via FOI on 11 November 2022. "A further exception under regulation 10(5)(b) of the EIRs (substantial prejudice to course of justice) applies to a limited amount of the information you have requested because the information was produced by a company (Briggs Marine Limited) contracted by Bakkafrost Scotland Ltd to salvage the feed barge" [wrote the Scottish Government in a letter to Scamon Scotland dated 8 November 2022](#) "This company is currently involved in legal proceedings with Bakkafrost Scotland Ltd. To release the documents is likely to substantially prejudice this legal action, even though the information is considered to be within scope of the EIR enquiry. This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, this is outweighed by the strong public interest in allowing the courts space to make judgements and not release information that would prejudice this process"



- "There were some discussions in terms of worst case scenario" [wrote Marine Scotland in an email dated 25 August 2022](#) "Should the barge explode mitigations are in place to protect public health. Rest centre for those inside sectors that could be impacted should the gas come to shore will be set up at Portree High school. The council offices would be used for emergency response centre. Public health will advise that people close windows and

doors as well to protect themselves should the gas reach shore. There was no mention of potential environmental impacts for this scenario”

From: [redacted] <[redacted]@gov.scot>
Sent: 25 August 2022 13:56
To: [redacted] <[redacted]@gov.scot>
Subject: Portree Barge gas venting plan update

Good afternoon [redacted].

[redacted]

I just wanted to give you a quick update in regards to the Portree Barge gas venting following the call this afternoon.

The key updates are as follows:

- Earliest timeframe for reducing gas on site is next Monday (29 August 22) as this is the earliest a vessel can arrive at site in order for nitrogen to be provided. May be worth briefing [redacted] on this incident as he is on rota next week.
- No change to barge condition and no increase in gas being released but gas bubbles still coming up to the surface.
- No change to alarms
- Site patrols – all going well. The use of guard vessels is working well.
- Dives – the dives have started on site to begin laying down hoses to remove gas from barge.
- Clearance for nitrogen to be used on vessel causing delays. MCA to be contacted for update on this.
- Water sampling. One sample was taken yesterday and another one is due to be taken today.
- Next meeting: Monday approx at 3pm but no confirmation has been sent.

There were some discussions in terms of worst case scenario. Should the barge explode mitigations are in place to protect public health. Rest centre for those inside sectors that could be impacted should the gas come to shore will be set up at Portree High school. The council offices would be used for emergency response centre. Public health will advise that people close windows and doors as well to protect themselves should the gas reach shore. There was no mention of potential environmental impacts for this scenario.



- Despite known safety concerns and discussions of emergency responses “should the barge explode” no public warnings were issued by Bakkafrost, Fire Scotland, Police Scotland or any other government agency (Highland Council actually [issued a ‘message of reassurance’ on 2 September 2022](#) to allay concerns expressed by Portree residents). Life in Portree continued as normal as tourists poured into town and children played in the harbour and walked along the coastal path blissfully unaware of the explosion risk – with the [RNLI in Portree going ahead with a family fun day on 27 August 2022 featuring Stormy](#):

 RNLI Portree
August 27 · 🌐

Lifeboats

Portree Lifeboat Open Day

Portree Lifeboat Station
Saturday 27 August 2022
2pm - 6pm

Come and join us, as we open our doors after 3 long years, for our annual Open Day!

Plenty of fun for all the family, come and grab one of our burgers, whilst browsing our stalls and have a look in our Trent Class Lifeboat! With friends coming too from our Emergency Service family, and Kyle Lifeboat will be coming over too! You never know, Stormy himself may make an appearance!!



Lifeboat Fundraisers (Skye and Raasay)
August 27 · 🌐

At last its here!! Time for Lifeboat Open Day after a long 3 year gap. Come along for a day of family fun at Portree Pier. Lots of fun things to do and some great stalls will be there from 2pm - 6 pm. Isle of Skye Pipe Band will be marching from Portree Square down to the Pier around 2pm. Come along and meet Stormy Stan.

👍 27 1 Share

As tourists looked on laughing (still not notified of the explosion risk) [lifeboats entertained in Portree harbour](#):

 RNLI Portree
August 30 · 🌐

What a great video sent to us from June and Craig Jackson!!!
Nothing beats a bit of power!
Thanks
IB



The show must go on (still with radio silence).....

 **RNLI Portree**
August 25 · 🌐

If you have missed the show, why not catch up & use the Radio Skye Listen again feature on their website.

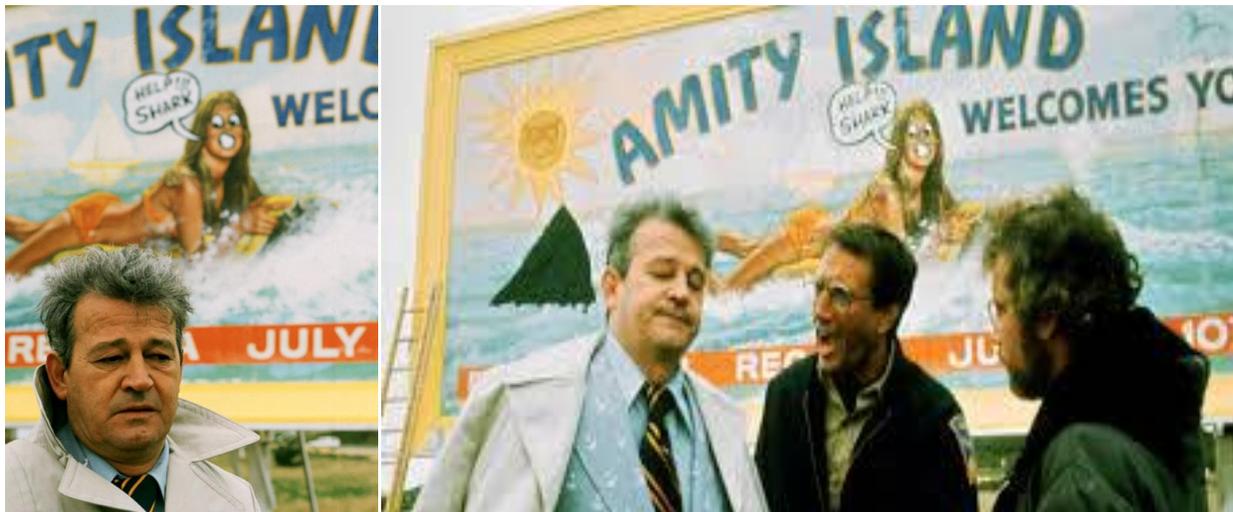


Radio Skye
August 25 · 🌐

Radio Skye went down to Portree Harbour on Saturday for the **RNLI Portree Lifeboat Open Day** and what fantastic day it was too. Lots of fun for all the family and a great way to raise much needed funds for this vital service. We got a chat with **Lifeboat Fundraisers (Skye and Raasay)** David Beaton plus HM Coastguards and the Mountain Rescue. Tune in to the **Breakfast Show** this morning from 7.30am.

The Monday Breakfast Show is kindly sponsored by **MGL Contractors Kyleakin**.

...no need to worry the tourists at the height on August bank holiday weekend!



Scamon Scotland would like to know why politicians and local councilors downplayed the “explosion” risks and why warnings were not issued to the general public (especially when Portree was “bursting at the seams” with tourists)?



Did the government agencies involved in keeping the explosion risks under wraps think the general public could not handle the truth about the ‘emergency response’ and ‘worst case scenario’ (certainly not when Skye’s tourist season was in full swing)?



- “At August 26 BMC [[Briggs Marine Contractors](#)] was released of their duties and a different contractor was brought in to assist SSC [Scottish Salmon Company/Bakkafrost] with the gas purging works” [reported Marine Masters via a report published in September 2022 \(obtained via FOI from SEPA in November 2022\)](#)

- “Briggs Marine have pulled out of site and demobilized” [reported Bakkafrost in an email to various stakeholders on 29 August 2022](#) “An official statement on this will be issued shortly. Rest assured the safety measures are still in place we have the patrol vessels continuing onsite. All the gas monitoring equipment was supplied via [redacted] so that all remains in place and this is still being monitored. We have engaged with a different salvage team and I will give more details on where we are at 3pm”

- An [email from Marine Scotland to Nature Scotland dated 29 August 2022](#) included:

The Seamate 450 fish feed barge owned by the Scottish Salmon Company sank during the tail end of 2021 in Portree Harbour, Isle of Skye with approximately 400t of feed on board.

Preliminary diving work started in July 2022 where bubbles were observed during the relief of the gas and oils from the silos. It became apparent that the gases were toxic in composition with Hydrogen Sulphide and Methane. Air gas monitors have been placed in ten locations surrounding the site and remotely monitored 24 hours a day to allow for early warning of any large release. The incident is very much public health focused, with little environmental impact discussed.

As far as I'm aware; there has been no change to the barge condition and no increase in gas being released, however gas bubbles are still being observed coming up to the surface.

I'm looking to see if you have any further input regarding environmental impacts in the area, such as; any seal haul out sites in the area to the east of Portree, under the cliffs that may be impacted if a catastrophic release were to happen.

- An [email from Marine Scotland to Marine Scotland \[names redacted\] dated 29 August 2022](#) stated that “3 draft media statements have been prepped in case of any release etc”:

The key updates are as follows:

- Marine Masters are taking over from Briggs
- Divers and support equipment expected on site either Thursday or Friday at the earliest with familiarisation dives aimed for Saturday
- Venting not expected to happen until Monday the very earliest
- No change to barge condition and no increase in gas being released
- No change to alarm monitoring and 24 hour site patrols going well
- New vessel secured and clearance for nitrogen has now been approved on it
- 3 draft media statements have been prepped in case of any release etc
- I highlighted the advice from Nature Scotland that the area is a European designated site for harbour porpoise. Nature Scot had nothing further to raise and want to be kept in the loop with further updates

- “I can confirm that my understanding was that the main concern was around public health based on the meeting I attended on Thursday” [stated an email from Marine Scotland to Marine Scotland \[names redacted\] dated 29 August 2022](#) “There was no mention of environmental impacts even for the worst case scenario. At the meeting on Thursday I didn’t say anything as my understanding was that Marine Scotland were there for information/awareness with no advice requested”
- “Over the past few weeks, there have been ongoing conversations regarding a fish farm barge that sunk last year” [stated an email from Marine Scotland to Marine Scotland \[names redacted\] dated 28 August 2022](#) “Gas from the feed being stored on the barge has built up and so regular discussions are being held with all relevant parties to plan to reduce the gas and also come up with contingency plans for if the situation worsens”
- A [media query from BBC News on 30 August 2022 prompted discussion by Scottish Government officials \[names redacted\]](#):

From: [redacted] <[redacted]@gov.scot>
Sent: 30 August 2022 13:51
To: [redacted] ([redacted])[redacted] <[redacted][redacted]@gov.scot>
Cc: [redacted] ([redacted]) <[redacted]@gov.scot>; [redacted] <[redacted]@gov.scot>; MS SpillResponse <MS.SpillResponse@gov.scot>
Subject: FW: Media query - Portree fishfarm - BBC

Hi [redacted],

I spoke to [redacted] and at the moment, we don't see the need for a submission to ministers. Please note; I can't see any previous submission to ministers on e-RDM regarding this (not sure if you know of one [redacted]?)

I've said I'll have this back to [redacted] for 3pm, so would appreciate your input below.

Please see a draft copy of the response below;

Marine Scotland has been liaising with Police Scotland and local authorities regarding the safety/exclusion zone approximately 2km from Portree, Isle of Skye. The safety/exclusion zone is connected to the sunken barge belonging to Bakkafrost Scotland which sank on the 27th of November 2021.

Initial salvage operations successfully removed the diesel from the fuel tanks, cleared the superstructure and the hatches and silos on board were sealed to prevent the release of the fish food on board. The sealed hatches have allowed the build up of gases which would otherwise have been released.

To prevent risk to the public and the environment, an exclusion zone is in place for the slight risk of toxic gases escaping. Guard vessels and gas monitors are monitoring the site 24 hours a day to provide an early warning of any release of gases whilst salvage operations are ongoing. It is proposed that gases will be flushed with nitrogen from the structure in a controlled release which will not pose any health risk before the structure is recovered

I don't see any correspondence of it being an exclusion zone, so would safety zone be used instead? Not sure if it is a statutory or advisory safety zone can you find notice to mariners? Safety zone is probably better

Thanks,
[redacted]

Here is the [BBC's media query forwarded by Scottish Government staff \[names redacted\] in the morning of 30 August 2022](#) [note that the BBC media query cites [Iain Macinnes - BBC Scotland's Highlands and Islands Senior Journalist](#) – and uses the phrase “explosive gases...in dangerous quantities” sourced from a Highland Council statement although [the article published by BBC News later on 30 August 2022](#) does not include “explosive” or “dangerous” and Highland Council’s ‘explosive’ statement is not online];

As discussed, we are running a story this morning about an exclusion zone in place off Portree Harbour. I just wondered if Marine Scotland are aware of this, and if they are investigating? Any information you can provide would be appreciated.

Story :

Its emerged that an exclusion zone is in place near Portree Harbour amid concerns that dangerous gases are being emitted from a sunken barge. The vessel was being used by a fish-farming company and people are being urged not to go within five hundred meters of the barge. Iain Macinnes has more.

The barge, which was being used by Bakkafrost Scotland - formerly known as the Scottish Salmon company - sunk on the outskirts of Portree harbour - while loaded with salmon feed. The company are organising a salvage operation which includes the precaution of an exclusion zone to protect vessels and the public. There is said to be a slight risk of toxic and explosive gases being emitted from the decomposing cargo in the barge - in dangerous quantities. Highland Council say that monitoring of gases will continue as the salvage operation progresses - and that the exclusion zone will stay in place in the area.

Highland Council statement :

A Highland Council spokesperson said: "There is currently an exclusion zone in place in an area of Portree Harbour in connection with a salvage operation on a sunken salmon feed barge belonging to the Scottish Salmon Company. The owners of the barge are organising a salvage operation that includes the precaution of an exclusion zone to protect vessels and the public from the slight risk of toxic and explosive gases being emitted from the decomposing cargo in the barge in dangerous quantities. As the salvage operation progresses, monitoring of the atmosphere for gases in and around the exclusion zone will continue."

- Marine Scotland's Communications officer [name redacted] [shortened the response to the BBC in the afternoon of 30 August 2022](#):

From: [redacted] <[redacted]@gov.scot>
Sent: 30 August 2022 15:54
To: [redacted] <[redacted]@gov.scot>
Cc: [redacted] <[redacted]@gov.scot>; [redacted] <[redacted]@gov.scot>; Communications Net Zero & Rural Affairs <CommunicationsNetZero&RuralAffairs@gov.scot>; [redacted] <[redacted]@gov.scot>; MS SpillResponse <MS.SpillResponse@gov.scot>
Subject: RE: Media query - Portree fishfarm - BBC

Thanks [redacted]

Suggest just shortening a bit - this still accurate?

"Marine Scotland officials have been liaising with Police Scotland, local authority representatives, NatureScot and the Maritime and Coastguard Agency following the sinking of a salmon farm feed barge near Portree, Isle of Skye. An exclusion zone is in place to protect the public from any potential health risk and Marine Scotland officials will continue to liaise with partner organisations to help ensure risks to both the public and the environment are identified and addressed."

[redacted] | Communications: News (Net Zero and Energy)
[redacted]
Scottish Government, St [redacted]'s House
e: [redacted]@gov.scot
[redacted]

- The BBC's media query and response from the Scottish Government [tripped a switch with the office of the Cabinet Secretary for Rural Affairs and Islands later in the evening of 30 August 2022:](#)

From: ([redacted]) <[redacted]@gov.scot> **On Behalf Of** Cabinet Secretary for Rural Affairs and Islands
Sent: 30 August 2022 18:07
To: [redacted] <[redacted]@gov.scot>; Cabinet Secretary for Rural Affairs and Islands <CabSecRAI@gov.scot>
Cc: [redacted] <[redacted]@gov.scot>; [redacted] <[redacted]@gov.scot>; Communications Net Zero & Rural Affairs <CommunicationsNetZero&RuralAffairs@gov.scot>; [redacted] <[redacted]@gov.scot>; MS SpillResponse <MS.SpillResponse@gov.scot>; [redacted] <[redacted]@gov.scot>; [redacted] (Special Adviser) <[redacted]@gov.scot>
Subject: RE: To clear - Media query - Portree fishfarm - BBC

[redacted]

Ms Gougeon hasn't yet had a chance to come back on this line so grateful if it could issue on SpAds clearance.

Thanks

[redacted] [redacted]
[redacted]
Cabinet Secretary for Rural Affairs and Islands
[redacted]

- Highland Council's 'Resilience Officer' (Corporate Communications) [emailed Bakkafrost, Police Scotland, NHS Scotland, SEPA and Scottish Government on 1 September 2022](#) suggesting a short "message of reassurance" via Highland Council's social media be issued to allay concerns from Portree residents in response to the [BBC article:](#)

From: [redacted] (Corporate Communications) <[redacted]@highland.gov.uk>
Sent: 01 September 2022 12:54
To: [redacted] <[redacted]@scottishsalmon.com>; [redacted] <[redacted]@scotland.police.uk>; [redacted] <[redacted]@mcga.gov.uk>; [redacted] ([redacted])[redacted] <[redacted][redacted]@gov.scot>; [redacted] <[redacted]@nhs.scot>; [redacted]@sepa.org.uk
Cc: [redacted] (Corporate Communications) <[redacted]@highland.gov.uk>
Subject: Portree Barge Incident - message of reassurance

Hi,

Since the BBC published [this](#), Highland Council has received a number of enquiries from concerned Portree residents. It's been suggested that a short 'message of reassurance' issued via Highland Council's social media ahead of tomorrow's meeting might allay some of these concerns. Suggested wording is below. I'd be very grateful if you could confirm if your agency is comfortable with this approach, or provide any feedback to the contrary.

"Regular multi-agency meetings, involving Police Scotland, the Coastguard, Marine Scotland, SEPA, The Highland Council, NHS Highland and Scottish Salmon, are taking place to progress the recovery of the sunken salmon feed barge and its cargo off Portree Harbour. The situation is being monitored and there is not considered to be any risk to the public as a result of the low levels of hydrogen sulphide detected. Monitoring equipment remains in place and further updates will follow as the incident is brought to a safe conclusion."

- Here is Highland Council's 'message of reassurance' [issued on 2 September 2022](#) (at a time when "explosive" toxic gases had been detected with contingency plans drawn up to use Council offices as an 'emergency response centre' in case of an explosion – and yet there was still no public warning re. the 55,000 ppm Hydrogen Sulphide reading!):



Statement on behalf of the Highlands and Islands Resilience Partnership – Portree barge incident

This article was published
2 Sep 2022

[NEWS ARCHIVE](#)

[News RSS feed](#)

A spokesperson for the agencies involved in the recovery of a sunken barge at Portree said: "Regular multi-agency meetings involving, the Coastguard, Marine Scotland, SEPA, The Highland Council, NHS Highland, Police Scotland and Bakkafrost (Scottish Salmon), are taking place to progress the recovery of the sunken salmon feed barge and its cargo off Portree Harbour.

Due to the decomposition of the fish feed within the sunken barge, small amounts of hydrogen sulphide gas have been released from the barge. The situation is being monitored and there is not considered to be any risk to the public as a result of the low levels of hydrogen sulphide detected. Monitoring equipment remains in place and further updates will follow as the incident is brought to a safe conclusion."

2 Sep 2022

Share this story

[Facebook](#) [Twitter](#) [LinkedIn](#) [Email](#)

- Highland Council's [Tweet \(2 September 2022\)](#) has still not received any likes or reTweets (no post can be found on [Highland Council's Facebook page](#) or on [Highland Council's Instagram page](#)):



The Highland Council 
@HighlandCouncil

...

Statement on behalf of the Highlands and Islands Resilience Partnership – Portree barge incident - ow.ly/9se950KyQZL

3:07 PM · Sep 2, 2022 · Hootsuite Inc.



- An [email from the Scottish Government to the Scottish Government \[names redacted\] dated 7 September 2022](#) detailed how the salvaged barge “all going well” would be taken to Kishorn (mis-spelled Keshorn) with the “feed offloaded at the port” and how Bakkafrost was “aware of licensing needing renewed within 12 months” with the anticipated timeline of recovery of the barge given as “middle of October”:

Please see the main points from the today’s meeting below:

- The vessel supporting the incident arrived in Portree this morning with all required equipment on board
- Small issue with the size of the vessel and the moorings available for it to be tied up for a period of time. Adequate moorings should be on site tomorrow
- There has been a delay with diving permits - initial dives now planned for the afternoon of 08/09/2022
- Still no detection of gases escaping
- Anticipated timeline of recovery of the barge is middle of October – dependent on how venting operations go
- All going well, the barge will be taken to Keshorn and feed offloaded at the port
- Bakkafrost aware of licensing needing renewed within 12 months
- No date for the follow up meeting – Bakkafrost will send out an updated invitation once they’re happy venting can go ahead

- “I’m pleased to say that the team onsite have managed to complete the hose connections quicker than anticipated” [updated Bakkafrost to various stakeholders on 11 September 2022](#) “And the Bakkanes [[a delousing vessel operated owned by Bakkafrost](#)] will move into venting position early this morning. After all the connections are checked and reading taken the venting operation will commence as long as the wind direction is favourable”

- [Bakkafrost emailed a statement to various stakeholders on 15 September 2022](#) (again there was no public warning or [press release issued on their website](#)):

Please see below statement from Bakkafrost Scotland.

A Bakkafrost Scotland spokesperson said:

“Bakkafrost Scotland can confirm the successful and safe completion of the initial recovery stage of venting gas from the submerged feeding barge at the Portree farm site, which was damaged during Storm ‘Arwen’ in November 2021.

“Throughout the recovery process we have been working closely with the relevant authorities including SEPA, Marine Coast Guards and Fire Brigade, alongside other experts, and we are now progressing to the next stage of the operation which will include lifting the barge.

“An exclusion zone was in place as a precaution throughout the venting operation and a ‘Notice to Mariners’ was issued on 5 August to ensure all affected were advised of the incident.

“The relevant authorities are being kept informed of progress and we will work with the recovery experts to ensure a safe conclusion to the operation.

“Bakkafrost Scotland is fully committed to ensuring public safety in relation to all of its operations, vessels and equipment.”

Best regards / Vinarliga

- An official report – ‘Salmon Feeder Barge: H2S Gas Purging’ – for Bakkafrost/The Scottish Salmon Company authored by Marine Masters in September 2022 (obtained via FOI from SEPA on 4 November 2022) included:

The Seamate 450 fish feed barge supplying pellet food to the salmon farm in Portree Harbour, Isle of Skye sank during Storm Arwen in Q4 2021 with approximately 400t of feed on board. Owners, Scottish Salmon Company (SSC), instructed Briggs Marine Contractors (BMC) shortly thereafter to secure the feed silos with temporary hatch covers to control and prevent the emission of feed oils that are part of the feed pellets from being emitted to the environment. In May 2022 BMC was awarded the contract to recover the barge. An ROV survey was conducted in June 2022 to aid the preparation of the salvage plan. Preliminary diving work started on site July 2022 with the aim of preparing the barge for recovery August 2022. During these works it was noticed that gas bubbles were escaping from the temporary hatch covers and from previously unidentified cracks in the concrete wall of the accommodation block on the starboard stern. These gas bubbles had not been identified during the ROV survey or during the early preparatory works.

41.

Hoses recovered with the FRC and run to the 1st of the Northern pens on the inshore side to the manifold for venting, and discharge of oils into the boomed off area in the 3rd pen North inshore side.



Figure 1 Proposed boomed off area (image for reference only)

FRC
Skipper
Crew

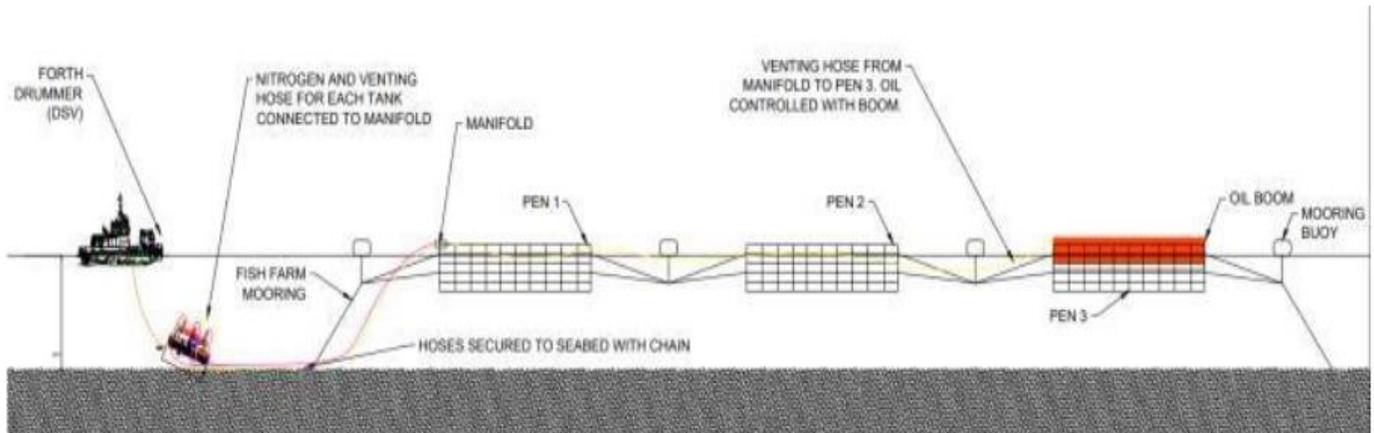
From the manifold at pen 11 the discharge pipe will continue onto pen 3 for discharge into the boomed off area.

The discharge pipe is tethered to the pen using ropes, there will be 4 pellet buoys placed between pens 1 and 2, then 4 pellet buoys placed between 2 and 3.



VENTING MANIFOLD		
51.	Surface operator opens valve A1 on venting Manifold and records pressure reading before opening discharge valve to containment boom in pen 3.	
52.	Pressure reading and sample gas to be taken. <ul style="list-style-type: none"> • Pressure reading = • Sample gas H₂S = Marine Chemist to be on station to provide direction / confirmation	Diver DS Chemist
53.	Nitrogen to be very slowly, continually trickle fed, into the silos with constant monitoring of the pressure readings, to dilute the H₂S until limit is achieved <20 % lower explosive limit or 8600ppm H₂s Marine Chemist to be on station to provide direction	DS Chemist

Overview of subsea setup



- Despite the build-up of “explosive” and toxic Hydrogen Sulphide gases, neither Bakkafrost nor the relevant authorities issued a warning to the general public (a ‘Notice to Mariners’ advising shipping of the salvage operation was [issued on 5 August 2022](#) but there is no evidence of a public warning to divers, tourists, open-water swimmers, kayakers, coastal path walkers, cruise ship holidaymakers and others being issued or an updated ‘Notice to Mariners’ warning of the “explosive” gases)

- \$camon \$cotland [broke the news early on 30 August 2022](#) following a tip-off on 28 August 2022 from a whistleblower in Portree who warned of “very high levels of toxic gasses

emerging from the barge” which “lead to an exclusion zone being put in place around the farm because of the dangers of these gasses and there is a 24hr guard by a boat”

Date: Sun, Aug 28, 2022 at 7:57 PM
Subject: Portree salmon farm
To: <salmonfarmingkills@gmail.com>

Hi

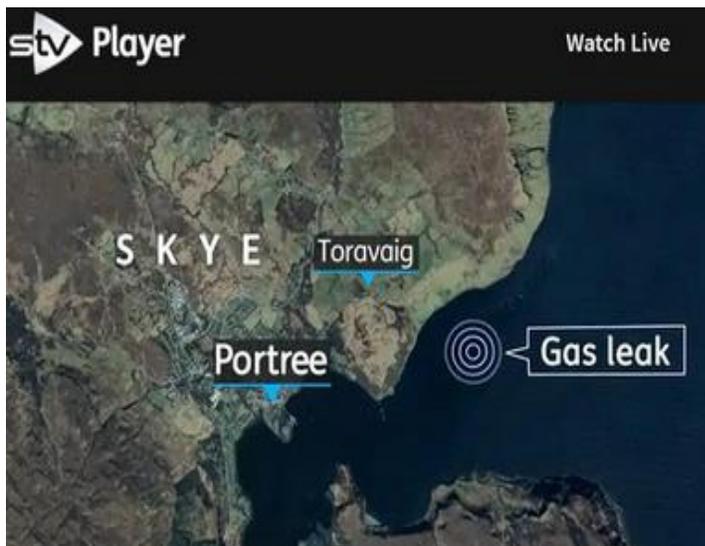
I recently came back to my home town of Portree for a visit, and found out the problems that have been going on at the Scottish Salmon Company (now Bakkafrost). Their feed barge sank end of last year with over 400t of feed on board and I believe the deck was also full of tubs filled with mortalities.

This barge has laid on the seabed since then and a few weeks ago a team of divers have come to the site to start the process of raising the barge, however this was stopped for over a week as there was found to be very high levels of toxic gasses emerging from the barge and the old feed, this has lead to an exclusion zone being put in place around the farm because of the dangers of these gasses and there is a 24hr guard by a boat.

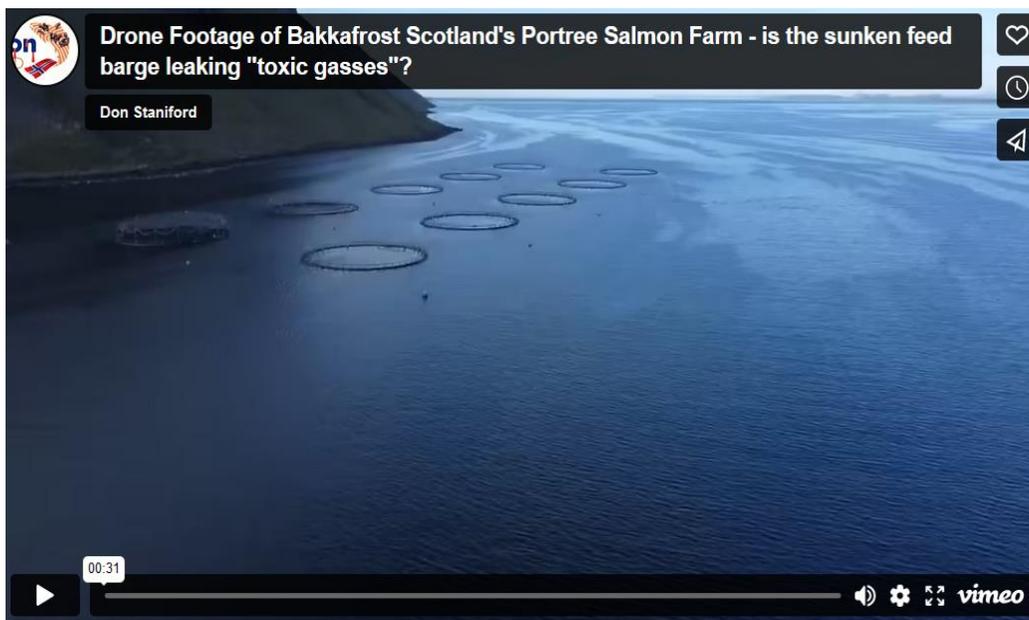
I am not sure if you are aware of this that has been happening and all the risks that is happening to the environment, its just another of a long list of how salmon farms are damaging the environment.

Thanks

- On 30 August 2022, [BBC News reported](#): “Rotten egg gas leaking from fish feed barge wreck”; followed by [The Press & Journal](#): “Exclusion zone set up around Skye barge giving off rotten eggs smell”; [Fish Farming Expert](#): “Experts tackle lethal gas leaking from sunken feed barge”, [Radio Skye](#) & [STV’s Evening News](#)



- On 31 August 2022, [The National reported](#): “500m exclusion zone near Portree Harbour in Skye as barge gives off rotten eggs smell” and [Yahoo News reported](#): “500m exclusion zone set up around sunken barge giving off smell of rotten eggs”; [Intrafish reported on 2 September 2022](#): “Toxic gases halt salvage of sunken Bakka Frost salmon feed barge off Scottish coast”; [Salmon Business reported on 6 September 2022](#): “Potentially toxic gas leaks from sunken salmon feed barge near Scottish coast”; and [The Oban Times reported on 8 September 2022](#): “‘No risk’ from Portree sunken feed barge, say experts”



- Bakka Frost’s feed barge – [manufactured by Gael Force and launched in March 2019](#) - was in operation for less than 3 years before it sank on 26 November 2021

- A [FOI reply by the Maritime & Coastguard Agency dated 1 November 2022](#) gave a summary of the ongoing situation – with ‘specialist contractors’ completing “works to vent the silos” and reduce gas levels in September 2022:

At the beginning of July 2022, the initial preparation for recovery works was ongoing when levels of Hydrogen Sulphide were identified within the feed silos. It is believed that the natural decomposition of the fish feed was causing the production of the gas. Consequently, operations were halted while a technical solution to reduce the gas levels was sought. A number of multi-agency meetings involving the previously mentioned stakeholders, Local Councillors, Emergency Services and the NHS were convened to identify a solution and ensure public safety was maintained. An exclusion zone was put in place and a guard vessel was deployed to patrol the area.

Specialist contractors commenced works to vent the silos and this work was completed in September 2022, when the gas levels were reduced, allowing the recovery operations to re-commence. It is expected that the barge will be lifted to the surface during November 2022 and removed from site for processing. The Maritime & Coastguard Agency and other environmental stakeholders will continue to monitor the operation until its full completion.

The Owners of the barge, Bakka Frost, continue to lead the recovery operation, with assistance and engagement from all other stakeholders as appropriate.

The Secretary of State’s Representative for Maritime Salvage & Intervention (SOSREP) has been engaged in the process from the outset and is also monitoring the recovery operation.

- A [FOI reply by the Scottish Government on 20 September 2022](#) summarized the situation as follows:

Marine Scotland Directorate were advised that a salmon farm feed barge had sunk in the vicinity of Bakkafrost Scotland's Portree site on 27 November 2021. Since the sinking, Marine Scotland Directorate has worked with partner organisations providing environmental advice.

The immediate response to the sinking saw the removal of both fuel & plastics from the sunken barge and the fish feed compartments were sealed to prevent the loss of fish feed to the marine environment prior to any wider salvage operations being taken forward.

Marine Scotland Directorate was recently made aware that low-levels of hydrogen sulphide had been detected at the salvage site. Bakkafrost Scotland confirmed on 15 September 2022 the safe and successful conclusion of gas venting from the sunken barge.

Marine Scotland Directorate continue to provide an advisory role helping to ensure that potential environmental impacts are considered and mitigated against where necessary as the salvage operations continue.

- Bakkafrost [disclosed a 10,000 tonne farmed salmon shortfall in Scotland via their Q3 2022 report published on 8 November](#)
- [Bakkafrost's 2021 Annual Report](#) published in October 2022 detailed a "deadly cocktail" of reduced gill health and "severe mortality":

In Scotland, we had severe mortality in Q3 and Q4, with a total of 262 mDKK in exceptional mortality costs. The underlying issue was linked to the reduced gill health the fish develops due to the extended growth cycle in the marine environment, up to 22 months, due to the small average smolt size on release. The fish are exposed to hazards that impair their gills during this period. Late in Q3 and into Q4, there was a significant bloom of hydrozoans and micro-jellyfish, which deteriorated the gill health even more and led to very high mortality across several sites. In short, the micro-jellyfish bloom on top of reduced gill health was a deadly cocktail.

- Bakkafrost was hailed as the 'King of Death' in a [damning report on mass mortalities published by Scamon Scotland in September 2022](#)

Data [published by Salmon Scotland](#) reveals that Bakkafrost/The Scottish Salmon Company continued to operate their Portree salmon farm [until harvesting out in June 2022 when 30.6% cumulative mortality was reported](#). According to [data published by Salmon Scotland](#), Bakkafrost/The Scottish Salmon Company harvested out Portree Outer salmon farm in January 2022 but the fish were “not harvested” (presumably that means the fish were moved to another location).

Bakkafrost operate two salmon farms off Portree – the one closest to Portree harbour is [named by Scotland’s Aquaculture database as Loch Portree \(Torvaig\)](#):



The other – further out into the Sound of Raasay – is [named Portree Outer](#):



The “explosive” feed barge sank at the inner Loch Portree (Torvaig) salmon farm – as detailed by this map [disclosed by SEPA via SEPA on 4 November 2022](#):



Area gas monitors to be positioned at below locations for continuous readings of H2s to the North, East, South and West from casualty location.

“Scottish salmon is dead in the water,” said Don Staniford, Director of \$camon \$cotland. “Bakkafrost is a danger to public health and should carry a hazardous warning label. Investors including the Norwegian Government (the largest shareholder in Bakkafrost) are haemorrhaging money as Bakkafrost Scotland lurches from one crisis to another. After this unmitigated disaster is over, Bakkafrost will struggle to salvage even a shred of their reputation in Scotland. It beggars belief that Bakkafrost shunned an ‘extremely expensive’ salvage operation and continued to farm salmon at Portree for over six months whilst toxic gases were building up underneath the cages to ‘explosive’ levels. Did the Food Standards Agency test the farmed salmon for contaminants? However you slice it, Scottish salmon is cheap, nasty and leaves a bad taste in the mouth.”



A [letter from the Scottish Government dated 8 November 2022](#) (received by Scamon Scotland via email on 11 November 2022) cited ongoing legal action between Bakkafrost Scotland and Briggs Marine (the salvage company first hired by Bakkafrost after the barge sinking in November 2021 – replaced by Marine Masters in late August 2022) as the reason to refuse some information [2]:

A further exception under regulation 10(5)(b) of the EIRs (substantial prejudice to course of justice) applies to a limited amount of the information you have requested because the information was produced by a company (Briggs Marine Limited) contracted by Bakkafrost Scotland Ltd. to salvage the feed barge. This company is currently involved in legal proceedings with Bakkafrost Scotland Ltd. To release the documents is likely to substantially prejudice this legal action, even though the information is considered to be within scope of the EIR enquiry.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, this is outweighed by the strong public interest in allowing the courts space to make judgements and not release information that would prejudice this process.

The Scottish Government's [belated document dump on 11 November 2022](#) follows a FOI review request by Scamon Scotland in September which led to a reversal of the Scottish Government's initial non-disclosure. A [letter from the Scottish Government dated 8 November 2022](#) (received via email on 11 November 2022) apologised for the original FOI reply from the Scottish Government on 20 September which only gave a brief summary rather than full disclosure of documents [2]:

Response to your review request

Having reviewed our initial response, I have concluded that a new decision should be substituted. The original request was not handled correctly under the EIRs and that we should have considered what recorded information was held by us on the incident to which your request refers, and provided you with this information where possible. I apologise that we did not do this, and have fed back my review findings to the business area that handled the initial request in order to improve future handling of

requests.

I have now reviewed the recorded information held that falls within the scope of your request, and I enclose a copy of most of the information you requested. This primarily comprises correspondence between the relevant areas of Marine Scotland which provided support to the on-going salvage operation and partner organisations involved in the response.

“Serious questions must now be asked of Bakkafrost, the Scottish Government, Highland Council and other government agencies for failing to notify the general public of the dangers posed by the toxic feed barge,” continued Staniford (who [first broke the explosive story in August 2022 following a tip-off by a whistleblower](#)). “If HM Coastguard issued a warning to cruise ships coming into Portree harbour to give the salmon farm a ‘wide berth’ then why weren’t tourists, kayakers, divers and other boat users warned? Emails clearly highlight risks posed to walkers on the coastal path running alongside the salmon farm and question the safety of shipping – including cruise ships visiting Portree. Yet even when divers discovered the explosive nature of the leaking toxic gases in mid-August the public were kept in the dark.

Bakkafrost has been caught cutting corners in terms of costs and safety and will ultimately pay a hefty price for failing to defuse this explosive incident. That it's now almost a year since the feed barge sank and it's still causing a headache shows the dangerous incompetence of this toxic salmon company – aided and abetted by government agencies that sacrifice public safety for reckless economic benefits.”

\$camon \$cotland today (14 November 2022) wrote to Bakkafrost ([known as The Scottish Salmon Company until June 2022](#)) asking why the general public, investors and the Norwegian stock exchange have not been notified about the ‘emergency’ situation involving “explosive” Hydrogen Sulphide toxic gases [4].

\$camon \$cotland will also be writing to government agencies asking for an explanation and investigation into why the general public were not notified of the risks. Further FOI requests on the “explosive” incident have been filed by \$camon \$cotland with Highland Council, Police Scotland, NHS Scotland and Fire Scotland. A FOI review request has been filed following [SEPA’s FOI disclosure on 4 November 2022](#).



Contact:

Don Staniford: 07771 541826 (salmonfarmingkills@gmail.com)

Notes to Editors:

[1] Download all the documents disclosed by the Scottish Government via FOI on 11 November 2022 [online here](#)

FOI Backgrounder re. the “Explosive” Bakkafrost/Scottish Salmon Company Sunken Feed Barge Off Portree (Isle of Skye)



Scottish Government review reply to Scamon Scotland dated 11 November 2022

From: <casehandling.service@gov.scot>
Date: Fri, Nov 11, 2022 at 12:10 PM
Subject: Your recent correspondence with Scottish Government and partner agencies - 202200321470
To: salmonfarmingkills@gmail.com

Please find attached a response to your correspondence.

3 Attachments • Scanned by Gmail ⓘ



[2] FOI correspondence with the Scottish Government:



Don Staniford
salmonfarmingkills@gmail.com

Our Reference: 202200317900

8 November 2022

Dear Mr. Staniford,

Further to my letter of 29 September 2022, I have now completed my review of our response to your request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on an incident regarding a sunken barge operated by Bakkafrost Scotland (formerly The Scottish Salmon Company) at a location near Portree on the Isle of Skye.

Background information;

A salmon feed-barge owned by Bakkafrost Scotland reportedly sank at its moorings in November 2021 near Portree on the Isle of Skye. Initial works by the owners to retrieve plastics and fuel containers were successful. As part of those works to stabilise the situation, the stocks of fish feed were sealed to prevent release into the natural environment. In 2022, preparations were made for the recovery of the barge. During these preparations it was identified that there had been a build-up of gases within the barge which might pose a hazard if released in an uncontrolled manner. The owners put in place safety measures to protect the public and environment from this potential hazard and have dealt with the build-up of gases.

Marine Scotland has continued to work with the owners and key partner organisations to identify sensitivities, helping to ensure that should there be any pollution event as a result of the barge sinking, mitigation is in place to minimise potential impacts.

Response to your review request

Having reviewed our initial response, I have concluded that a new decision should be substituted. The original request was not handled correctly under the EIRs and that we should have considered what recorded information was held by us on the incident to which your request refers, and provided you with this information where possible. I apologise that we did not do this, and have fed back my review findings to the business area that handled the initial request in order to improve future handling of

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot

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www.gov.scot



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Until 2020



requests.

I have now reviewed the recorded information held that falls within the scope of your request, and I enclose a copy of most of the information you requested. This primarily comprises correspondence between the relevant areas of Marine Scotland which provided support to the on-going salvage operation and partner organisations involved in the response.

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

A further exception under regulation 10(5)(b) of the EIRs (substantial prejudice to course of justice) applies to a limited amount of the information you have requested because the information was produced by a company (Briggs Marine Limited) contracted by Bakkafrost Scotland Ltd. to salvage the feed barge. This company is currently involved in legal proceedings with Bakkafrost Scotland Ltd. To release the documents is likely to substantially prejudice this legal action, even though the information is considered to be within scope of the EIR enquiry.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, this is outweighed by the strong public interest in allowing the courts space to make judgements and not release information that would prejudice this process.

If you are unhappy with the outcome of this review you have the right to appeal to the Scottish Information Commissioner about our decision within 6 months of receiving this letter. Information on how to make an appeal, along with an application form, is available on the Commissioner's website at: <http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>. You can also contact the Commissioner at:

The Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS
E-mail: enquiries@itspublicknowledge.info
Telephone: 01334 464610

Should you then wish to appeal against the Commissioner's decision, there is a right of appeal to the Court of Session on a point of law only.

Yours sincerely

Bernadette Moloughney
FISH : Sea Fisheries Marine Conservation

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Sep 20, 2022 at 5:18 PM
Subject: Review re: 202200317900
To: <directormarinescotland@gov.scot>

Please consider this a formal request for a review of FOI-2022-00317900.

The reasoning behind this FOI review request is simple - the 'reply' did not include any documentation (e.g. emails, letters and any other specific information). It merely alluded to how Marine Scotland were "advised" and how MS have "worked"- without providing the requested documentation:

Response to your request

Marine Scotland Directorate were advised that a salmon farm feed barge had sunk in the vicinity of Bakkafrost Scotland's Portree site on 27 November 2021. Since the sinking, Marine Scotland Directorate has worked with partner organisations providing environmental advice.

The immediate response to the sinking saw the removal of both fuel & plastics from the sunken barge and the fish feed compartments were sealed to prevent the loss of fish feed to the marine environment prior to any wider salvage operations being taken forward.

Marine Scotland Directorate was recently made aware that low-levels of hydrogen sulphide had been detected at the salvage site. Bakkafrost Scotland confirmed on 15 September 2022 the safe and successful conclusion of gas venting from the sunken barge.

Marine Scotland Directorate continue to provide an advisory role helping to ensure that potential environmental impacts are considered and mitigated against where necessary as the salvage operations continue.

Please therefore provide the source documents and specific information.

Please provide a receipt for this review request.

The next email encloses the FOI request.

Thanks,

Don Staniford

Director, \$camon \$cotland



Don Staniford
salmonfarmingkills@gmail.com

Our Reference: 202200317900

20 September 2022

Dear Don Staniford,

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

Thank you for your request dated 29 August 2022 under the Environmental Information (Scotland) Regulations 2004 (EIRs).

Your request

You asked for:

"Could you please provide information on the alleged incident at Bakkafrost Scotland's Portree salmon farm? Marine Scotland is listed above on the distribution list. Presumably, if there has been a toxic leak, then Marine Scotland would have been notified and would have been involved. Further information on this alleged pollution incident would be much appreciated."

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

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

the outcome of your request.

Response to your request

Marine Scotland Directorate were advised that a salmon farm feed barge had sunk in the vicinity of Bakkafrøst Scotland's Portree site on 27 November 2021. Since the sinking, Marine Scotland Directorate has worked with partner organisations providing environmental advice.

The immediate response to the sinking saw the removal of both fuel & plastics from the sunken barge and the fish feed compartments were sealed to prevent the loss of fish feed to the marine environment prior to any wider salvage operations being taken forward.

Marine Scotland Directorate was recently made aware that low-levels of hydrogen sulphide had been detected at the salvage site. Bakkafrøst Scotland confirmed on 15 September 2022 the safe and successful conclusion of gas venting from the sunken barge.

Marine Scotland Directorate continue to provide an advisory role helping to ensure that potential environmental impacts are considered and mitigated against where necessary as the salvage operations continue.

Your right to request a review

If you are unhappy with this response to your EIR request, you may ask us to carry out an internal review of the response, by writing to Annabel Turpie, The Director of Marine Scotland Directorate, Area 1B South, Victoria Quay, The Shore, Edinburgh, EH6 6QQ or by emailing: Directormarinescotland@gov.scot. Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at: [Appealing to the Scottish Information Commissioner \(itspublicknowledge.info\)](https://itspublicknowledge.info).

Yours sincerely

Susan Burlinson
MPP : Licensing Operations

[3] Correspondence with Briggs Marine:

Erica Skoukine (Briggs Marine)

8 Nov 2022, 10:57 GMT

Hi Don,

There was no issue with our services, the reason for our departure was due to a commercial dispute regarding payment.

Kindest regards

Erica

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Nov 8, 2022 at 10:18 AM
Subject: Re: Update: Salvage of salmon feed barge off Portree?
To: Briggs Marine <enquiries@briggsmarine.com>

Thanks - did Briggs Marine not have the expertise to deal with "explosive" gases or were SSC/Bakkafrost not happy with the work of Briggs Marine?

One of the reports disclosed via FOI by SEPA includes:

https://donstaniford.typepad.com/files/email-3_salmon-feeder-barge-gas-purging_attachment.pdf

"At August 26 BMC was released of their duties and a different contractor was brought in to assist SSC with the gas purging works"

An explanation would be much appreciated.

Thanks,

Don

Erica Skoukine (Briggs Marine)

8 Nov 2022, 10:13 GMT

Hi Don,

Many thanks for getting in touch.

Unfortunately, I am unable to answer your query as this is a project Briggs Marine are no longer involved in.

Kind regards

Erica

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Nov 8, 2022 at 8:25 AM
Subject: Update: Salvage of salmon feed barge off Portree?
To: <enquiries@briggsmarine.com>

Do you know when the salvage operation of the salmon feed barge off Portree will be completed?

A FOI reply from MCA said the salvage was expected to be completed this month (November 2022):

[Toxic Salmon Barge Salvaged This Month Off Portree \(as revealed by FOI disclosure by the Maritime & Coastguard Agency\)](#)

There's more details disclosed today by SEPA including the Marine Masters report on gas purging:

["Explosive" FOI disclosure from SEPA on Toxic Gases Spewing from The Scottish Salmon Company \(Bakkafrost\) Off Portree!](#)

Tweet via: <https://twitter.com/TheGAAIA/status/1589885835687890945>

Have the "explosive" Hydrogen Sulphide gases been successfully purged/vented from the sunken salmon feed barge?

If you have any updated information it would be much appreciated.

Best fishes,

Don Staniford

Director, \$camon \$cotland

[4] Correspondence with Bakkafrost:

From: **Don Staniford** <salmonfarmingkills@gmail.com>

Date: Tue, Aug 30, 2022 at 12:52 PM

Subject: Toxic Gasses at Bakkafrost Scotland?

To: <toda@bakkafrost.com>, <sasi@bakkafrost.com>, <ruw@havsbrun.fo>, <reja@bakkafrost.com>

Cc: <dougie.macleod@scottishsalmon.com>

Can Bakkafrost please comment publicly on the toxic gasses spewing from a sunken feed barge off Portree on the Isle of Skye?

Details via: [Toxic Gasses Spew From The Scottish Salmon Company \(Bakkafrost Scotland\) Off Portree?](#)

The salvage operation for the sunken feed barge was notified to various agencies earlier this month via The Scottish Salmon Company:

http://whamassoc.org.uk/bundles/app/downloads/62f14a6b8b2b9_SSC_Notice%20to%20Mariners_Portree.pdf

3. VESSELS

Operations will be conducted by the following vessel. Contact can be made with the vessel using the details listed below.

Vessel Contact Details (MV Forth Drummer)	
Call Sign	2FIG9
Site Manager	Dougie MacLeod
Email	dougie.macleod@scottishsalmon.com
Tel	07717 328 414



I was just searching Bakkafrost's financial reports: <https://www.bakkafrost.com/en/investor-relations/>

Where is the sunken feed barge incident cited in Bakkafrost quarterly reports?

Grieg Seafood, for example, reported losses due to a sunken feed barge on the Isle of Skye in 2018 to shareholders and investors: <https://www.fishfarmingexpert.com/grieg-grieg-shetland-salmon/feed-barge-sinking-scuppers-grieg-shetlands-q1-profits/1256638>

Surely Bakkafrost has a duty to report such losses to shareholders and stock exchange?

Thanks,

Don Staniford

Director, Scamon Scotland