

## Media Backgrounder (April 2018)

### SEPA's Shame on Salmon Farming



#### Summary:

**There has not been a single successful prosecution of a salmon farm since November 2008 (between 1998 and 2008 there were at least 23 prosecutions with fines totalling at least £106,500)**

**91% of site inspections by SEPA to salmon farms are announced (i.e. only 9% are unannounced)**

**51 fish farms were assessed as "Very Poor", "Poor" or "At Risk" in 2016**

**Damning Report by the Scottish Parliament in March 2018**

**SEPA staff joining Marine Harvest as 'Head of Environment & Regulatory Affairs' and 'Applications Manager'**

**Toxic chemical ban on Emamectin benzoate reversed following lobbying by industry despite damning report showing lethality to lobsters**

**Rubber-stamping of expansion with new 'super-size' salmon farms over 2,500 tonnes in the pipeline (despite over 858 biomass exceedances between 2002 and 2016)**

**The use of the toxic chemicals Azamethiphos, Cypermethrin, Deltamethrin and Emamectin benzoate increased 1000% between 2006 and 2016**

**Chemical pollution of Scottish lochs - testing between 2006 and 2016 showed 45 lochs contaminated with Emamectin benzoate and Teflubenzuron**

**There has not been a single successful prosecution of a salmon farm since November 2008 (between 1998 and 2008 there were at least 23 prosecutions with fines totalling at least £106,500):**

A [FOI reply from SEPA dated 12 March 2018](#) detailed:



Our Ref: F0188509

If telephoning ask for:  
Cara Everitt

12 March 2018

Dear Mr Staniford

#### **REQUEST FOR INFORMATION**

Thank you for your recent request, received by SEPA on 12 February 2018, in which you asked for the following information:

*Please provide information on prosecutions involving fish farms since April 2006.*

*Please detail a list of successful prosecutions along the lines of the information detailed below.*

We have applied the exemption under Section 39(2) of the Freedom of Information (Scotland) Act 2002 as we have determined that the information sought in your request is environmental information. We are therefore handling your request under the terms of the Environmental Information (Scotland) Regulations 2004 (EIRs). In this case the public interest in maintaining this exemption and in dealing with the request in line with the requirements of the EIRs outweighs any public interest in disclosing the information under FOISA.

#### **Response**

We advise SEPA does not prosecute its own cases. SEPA reports cases to the Crown Office and Procurator Fiscal Service (COPFS) who receive reports relating to offences from SEPA, the police and other reporting agencies and then decide what action to take, including whether to prosecute.

We advise there have been two successful prosecutions involving fish farms since April 2006 resulting from SEPA reporting cases to the COPFS. Please refer to the summary below for details of each prosecution.

- Marine Harvest Scotland Ltd (following a plea of guilty were fined on 12 December 2007) – an unauthorised discharge of effluent to a river, depositing sludge on land and burning waste. All offences took place at the Amhuinnsuidhe Hatchery site on the Isle of Harris. Fined £23,500
- Lighthouse Caledonia Limited (pled guilty on 27 November 2008) - spilling diesel/fuel oil which leaked through a bund wall and then ultimately discharged to the Russel Burn. The Russel Burn flows into Loch Kishorn. Fined £12,000.

**From:** Don Staniford [mailto:salmonfarmingkills@gmail.com]

**Sent:** 12 February 2018 10:46

**To:** 'AccessToInformation'

**Subject:** FOI re. prosecutions of fish farms since April 2006 - Zero?

Please provide information on prosecutions involving fish farms since April 2006.

Please detail a list of successful prosecutions along the lines of the information detailed below.

The 2008 report [Scottish Farmed Salmon Exposed](#) reported 21 water pollution incidents involving fish farms from April 2006 to 1998:

## Water Pollution Incidents in Scotland

- **Lakeland Marine Farm** (27th April 2006) - cause or knowingly permit a trade effluent namely effluent containing uneaten fish food and fish faeces to be discharged to controlled waters by way of the nets of said fish farm cages, having caused or knowingly permitted the total biomass contained in the south cage group to exceed the maximum biomass permitted for said cage group in terms of the consent issued by SEPA on 11 August 2004, namely 750 tonnes: CONTRARY to the Control of Pollution Act 1974, Section 30F(3). Fined £1,000.
- **Kames Fish Farming** (12th January 2006) - poisonous/noxious/polluting matter - fish faeces & uneaten fish feed, to Loch Lochy, by way of nets of fish farm cages. Alternative charges under s30F(1) & (3) CoPA. Fined £8,000.
- **Marine Harvest Scotland** (27th July 2005) - cause or knowingly permit poisonous, noxious or polluting matter or any solid waste matter namely fish viscera, blood and congealed fat deposits, scum & grease to the River Lochy contra s30F(1) CoPA 1974. Fined £4,000.
- **Hoganess Salmon** (6th July 2005) - s30F(1) CoPA - Emamectin Benzoate to the Gruting Voe by way of administering to salmon in fish cages. Fined £2,000.
- **Wester Sound Salmon** (6th July 2005) - 2 charges under s30F(1) - Emamectin Benzoate to the Vaila Sound, by administering to salmon in cages at Burrastow and Cloudin sites. Fined £2,000.
- **Pan Fish Scotland** (17th February 2005) - causing or knowingly permitting diesel oil to enter Loch Torridon by way of a leak from compressor with no boom, bund, drip tray or impermeable base in place & no procedure in place for dealing with diesel spills- contra s30F(1) CoPA. Fined £10,000.
- **Wester Ross Salmon Hatcheries** (26th August 2004) - effluent from fish farm cages discharged to Loch Tollaidh contra s30F(3) CoPA, alternatively s30F(1). Fined £12,000.
- **Scottish Sea Farms** (25th September 2003) - causing or knowingly permitting trade effluent, namely effluent arising from Ardtornish Fish hatchery, to be discharged into the River Rannoch at Ardtornish, Morvern, Argyll by way of a pipe leading from a discharge treatment drum - contra s30F(3) CoPA 19. Fined £1,000.
- **WISCO Processing** (16th June 2003) - contravention of s30F(1) CoPA 1974 - sodium hypochlorite solution to controlled waters - the Glen River, Stormoway. Fined £8,000.

## Water Pollution Incidents in Scotland

- **Scottish Sea Farms** (19th December 2002) - Contravention of section 30F(1) CoPA 1974 - diesel oil to Loch Kishorn. Fined £3,000.
- **Kames Fish Farming** (12th February 2002) - fish-processing wastes to the Eas 'a Chaorainn, also known as the Kames Burn, in contravention of section 30F(1) or (3) CoPA 1974. Fined £5,000.
- **Setter Ness Salmon** (23rd January 2002) - Two charges of contravening section 30F(1) CoPA 1974 - ivermectin from fish cages to controlled waters. Fined £3,000.
- **Corrie Mhor Salmon** (15th February 2001) - Trade effluent from fish tanks/grader to controlled waters in contravention of 30F(3) CoPA 1974. Fined £3,000.
- **Aquascot Group** (24th October 2000) - Contravention of Section 30F(1) CoPA 1974 - unconsented trade effluent from fish cages to controlled waters. Fined £500.
- **Marine Harvest Scotland** (23rd August 2000) - Section 30F(3) CoPA 1974 - trade effluent (fish processing effluent) to controlled waters. Admonition.
- **Marine Harvest Scotland** (27th June 2000) - Contravention of section 30F(3) CoPA 1974 - trade effluent from a fish farm in the form of fish fat and fish oils to controlled waters. Fined £500.
- **Shetland Intensive Smolts** (19th May 2000) - section 30F(3) COPA trade (fish hatchery) effluent to controlled waters. Fined £3,000.
- **Aquascot Group** (1st December 1999) - section 30F(1) or 30F(3) COPA 74 - discharge of fish feed/faeces to Inner Loch Clash in contravention of consent. Fined £2,500.
- **Wadbister Offshore** (15th April 1998) - section 30F(3) COPA. Illegal use of Cypermethrin. Fined £1,000.
- **EWOS** (25th February 1998) - Discharge of trade effluent (heavy fuel oil) from fish food factory to controlled waters contrary to Section 30F(3) COPA 1974 (as amended). Fined £2,000.
- **EWOS** (undated) - section 30F(3) COPA - trade effluent from fish food factory to controlled waters. Fined £500.

GAAIA believes that very few, if any, prosecutions involving fish farms have been successful since 2006.

In 2010, The Sunday Herald [reported](#):

## Salmon farm facing prosecution over thousands of fish deaths

from [Sunday Herald, 26 September 2010](#)

One of Scotland's leading fish farm companies may face prosecution after many thousands of salmon were accidentally killed by an overdose of an unauthorised and highly toxic pesticide.

The Sunday Herald has learnt that investigator [S](#) found significant quantities of pesticides banned for use on fish farms during raids on boats used by Hoganess Salmon, run by the Lakeland Group at Burrastow near Walls on the west coast of Shetland.

Excessive amounts of the pesticides, meant to kill the lice that eat away at salmon, are thought to have been used to douse the fish, causing mass mortalities and destroying other marine wildlife.

The incident occurred on 15 August when salmon were being treated for lice in a well boat, which has containers for live fish. It was initially reported that 6,000 fish died, but investigators have told the Sunday Herald that the total could be up to 20,000.



An investigation has been launched by the [Scottish Environment Protection Agency \(Sepa\)](#), the [Scottish Society for the Prevention of Cruelty to Animals \(SSPCA\)](#), [Shetland Islands Council](#) and several other agencies. Though it is not yet completed, investigators say that there will be a prosecution.

The [Lakeland Group](#), which was owned by the Norwegian fish farming multinational, [Marine Farms](#), before being bought this month by the Polish company [Morpol](#), has admitted that "lice products not approved for salmon may have been used". It has suspended all harvesting of fish from Hoganess.

The company has also withdrawn from the salmon quality certification schemes run by industry bodies. According to the government's [Food Standards Agency](#), no fish from the site have entered the food chain since 6 August, nine days before the incident.

"Investigations are ongoing into the alleged use of unauthorised chemicals to treat sea lice at a salmon farm on the west side of Shetland," Sepa's chief executive, Campbell Gemmill reported to his board last week.

"Sepa officers visited the farm premises unannounced and removed items for further investigation, including chemical canisters, samples of fish and seaweed for analysis," he said.

"Results of the analysis appear to support the need for Sepa to investigate the matter further, and officers are carrying out interviews and further evidence-gathering with a view to taking appropriate enforcement action."

However, Shetland News [reported](#) in 2011:

# Salmon poisoning case slips through the net

17:25 Tuesday, 18 October 2011 | Written by Pete Bevington



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THE SCOTTISH Green Party have hit out after the Scottish government allowed a case of salmon poisoning which last year killed more than 20,000 fish in Shetland to slip through the net.

Environment agency SEPA announced on Tuesday that they had abandoned an investigation against a Shetland salmon farm for using illegal chemicals in August 2010, despite overwhelming evidence.

More than one year after the inquiry into Hoga Ness Salmon began, SEPA have said that they are unable to pursue the company because of a legal technicality.

Green MSP Patrick Harvie said: "This is a truly shocking case of environmental destruction and bureaucratic incompetence.

"A series of government agencies gathered strong evidence that illegal and dangerous chemicals were used at this salmon farm, chemicals that kill wildlife indiscriminately as well as killing salmon, yet none of them were prepared to act and bring prosecutions."

The investigation was led by SEPA and animal charity SSPCA after 100 tonnes of farmed salmon died suddenly at the fish farm off Shetland's west coast.

SSPCA officers submitted a report to the procurator fiscal five months later and two men were charged with cruelty to animals.

However the case relied on SEPA's report, who were pursuing the company under regulations covering the discharge of chemicals into the sea from fish farms.

Fourteen months after the initial raid, SEPA this week announced that they had dropped the case, saying they had been using the wrong legislation as the discharges had been from a well boat on which the fish had been treated for sea lice.

Insiders say that highly toxic chemicals Deosect and Cyperguard, commonly used for treating horses and sheep for lice, were found during the raid on the fish farm. These chemicals are banned from the marine environment because they are so toxic and long lasting.

Salmon companies have long been accused of using such chemicals because sea lice have built up a resistance to authorised treatments, such as Excis, Salmosan and Alphamax.

Sea lice have been described as the industry's biggest problem, and three years ago they cost Shetland's salmon farmers millions of pounds in dead fish.

On Tuesday SEPA said: "Following discussion of the circumstances with the procurator fiscal, it was identified that there was no basis for taking action under the Water Environment (Controlled Activities) (Scotland) Regulations 2011, the legislation used by SEPA to regulate fish farms."

However Marine Scotland, who should be responsible for this case, have also declined to submit a report to the fiscal.

A government spokeswoman said: "Given the time elapsed it would not now be appropriate or practical to pursue a case under another regulatory regime."

She added: "Apparent infringements of this type are by their very nature particularly complex and establishing what has happened after the fact is less than straightforward."

"We will consider whether there are any lessons to be learned in terms of simplifying the regulatory regime as we develop proposals for the forthcoming Aquaculture and Fisheries Bill."

Patrick Harvie warned of a danger that the fish farming industry might feel they could get away with poisoning the environment.

"SNP ministers must give clear instructions to their agencies that these crimes matter and prosecutions will be brought, otherwise the impression will grow that they have no interest in protecting Scotland's waters if that means running up against their friends in the fish farming industry," he said.

If there have been zero prosecutions since 2006 a simple reply along the lines of "Sorry, SEPA has not bothered to take any prosecutions against fish farms since 2006" will suffice.

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.



Please include warning letters, correspondence, the names of the companies responsible and any data analysis including Powerpoint slides, reports, briefings and other breakdowns of the data.

[SEPA's Enforcement Report](#) published today does not name the companies responsible.

Searching the [SEPA compliance web-page](#) finds three sites assessed as "Very Poor" in 2016 - but there are no details of the companies responsible:

Auth No.	Year	Regime	Site Name	Compliance Band	Sector	Team Area		
CAR/L/1003325	2016	CAR	Ardchattan Bay MCFE, Loch Etive	Very Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1008860	2016	CAR	Balure MCFE, Loch Spelve (Site A)	Very Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1002214	2016	CAR	Mingarry Hatchery	Very Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>

Searching the [SEPA compliance web-page](#) finds 41 sites assessed as "Poor" in 2016 - but there are no details of the companies responsible:

Auth No.	Year	Regime	Site Name	Compliance Band	Sector	Team Area		
CAR/L/1003012	2016	CAR	Ardessie MCFF, Little Loch Broom (Site A)	Poor	Fish farming	North Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1002942	2016	CAR	Baigh Chlann Neill MCFF, North Uist	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1002202	2016	CAR	Barvas Hatchery, Isle of Lewis	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1111048	2016	CAR	Bastaness MCFF, Mid Yell, Shetland	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1004031	2016	CAR	Bight Of Foraness MCFF, Yell Sound	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1009962	2016	CAR	Callert MCFF, Loch Leven	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003062	2016	CAR	Chalmers Hope MCFF, Bring Deeps	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1002193	2016	CAR	Clachan Hatchery, South Uist	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003929	2016	CAR	Collafirth Ness MCFF, Swining Voe (Site 3)	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1001809	2016	CAR	Corry MCFF, Loch Broom	Poor	Fish farming	North Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1002178	2016	CAR	Couldoran Hatchery	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1105276	2016	CAR	Creag an Sagairt (West), Arnisdale, Glenelg	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1001816	2016	CAR	Creag an Sagairt MCFF, Loch Hourn, Kyle	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003873	2016	CAR	Djuba Wick MCFF, Hascosay Sound	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003494	2016	CAR	Fishnish East MCFF, Sound of Mull (Site B)	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003493	2016	CAR	Fishnish West MCFF, Sound of Mull (Site A)	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>

CAR/L/1000329	2016	CAR	Furnace Hatchery Main Discharge	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1102386	2016	CAR	Gometra MCFF, Loch Tuath, Isle of Mull	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1011922	2016	CAR	Groatay MCFF, Cheese Bay, Isle of North Uist	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1095612	2016	CAR	Hellisay, Sound of Hellisay, Isle of Barra	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1000809	2016	CAR	Inch Kenneth MCFF, Loch na Keal	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1009162	2016	CAR	Invasion Bay MCFF, Loch Sunart	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1011300	2016	CAR	Invicta Trout Fish Farm	Poor	Fish farming	Dumfries & Galloway	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1001840	2016	CAR	Kinlochmoidart Hatchery	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1004225	2016	CAR	Kirk Noust MCFF, Rousay Sound	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1004208	2016	CAR	Kirkabister MCFF, Basta Voe	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1001791	2016	CAR	Kyles Vuia East MCFF, West Loch Roag	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1004209	2016	CAR	Laxo MCFF, Dury Voe (Site 2)	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1010433	2016	CAR	Letterfearn MCFF, Loch Duich	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003113	2016	CAR	Loura Voe MCFF, Dury Voe (Site 3)	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1129789	2016	CAR	North Shore East MCFF, Loch Erisort	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1002997	2016	CAR	Ouse Ness MCFF, Papa Sound	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1000810	2016	CAR	Port Na Cro MCFF, Shuna Sound	Poor	Fish farming	West Highlands & Argyll	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003954	2016	CAR	Puldrite MCFF, Wide Firth	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1040427	2016	CAR	Sound of Harris, Isle of Harris	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1015763	2016	CAR	South Linga MCFF, Yell Sound	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003943	2016	CAR	South Sound MCFF, Mangaster Voe	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003931	2016	CAR	Veantrow Bay MCFF, Shapinsay	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1005091	2016	CAR	Vee Taing MCFF, Uyea Sound	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1003928	2016	CAR	Vidlin Ness North MCFF, Vidlin Voe	Poor	Fish farming	Northern Isles	<a href="#">View Details</a>	<a href="#">View Reports</a>
CAR/L/1015852	2016	CAR	Vuia Beag MCFF, West Loch Roag	Poor	Fish farming	Hebrides and Central Highland	<a href="#">View Details</a>	<a href="#">View Reports</a>



In February 2017, GAAIA [reported](#):

## **The Global Alliance Against Industrial Aquaculture, 26 February 2017**

### **Failing Fish Farms - 18% rated "poor" by SEPA in 2015**

Exclusive information obtained via FOI from the Scottish Environment Protection Agency (SEPA) lifts the lid on the "poor" performance of Scotland's marine salmon farms - with almost a fifth (18%) classified by SEPA as failing and responsible for "at least one significant breach". Norwegian-owned Marine Harvest, Scotland's largest salmon farming company, is the worst operator with 13 "failing" salmon farms in 2015 (that's 27% of the [49 marine salmon farms operated by Marine Harvest Scotland](#)).

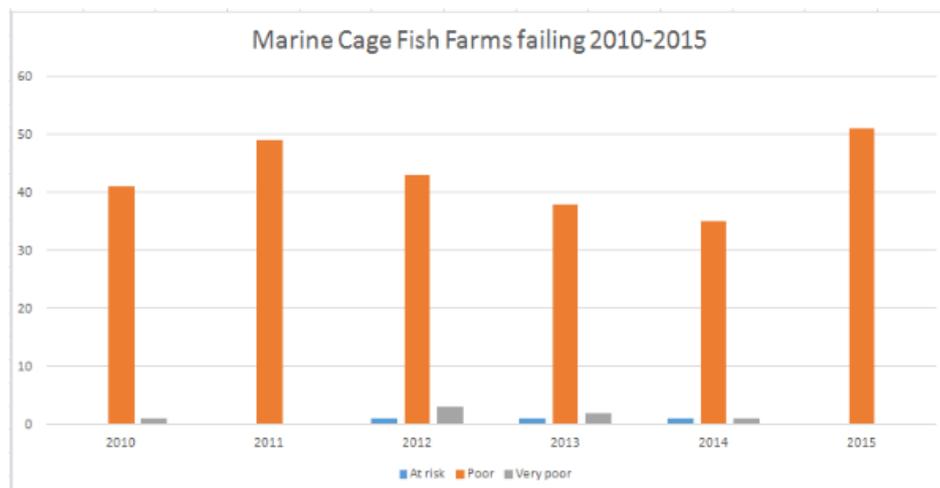
The number of marine salmon farms assessed by SEPA as "poor" rose from 37 in 2014 to 51 in 2015 (the worst year on record). Failures reported in 2015 included "biomass exceedance", "chemical residue exceedance", "insufficient monitoring", "chemical use exceedance" and "unsatisfactory seabed surveys".

In November 2016 SEPA published their '[Compliance Assessment](#)' scheme which rated 58 fish farms as "poor" in 2015 (an increase from 2014 when there were 42 fish farms assessed as "poor"). Importantly, the data did not name the operators prompting a FOI request from GAAIA.

And:

Based upon [documents disclosed by SEPA in February 2017](#) (via F0187239 and F0187139), GAAIA can now reveal:

- 18% of marine cage fish farms were rated "poor" in 2015
- 2015 is the worst year with 51 rated as "poor" (up from 37 in 2014)



- Marine Harvest is the worst operator followed by the Scottish Salmon Company, Scottish Seafarms, Cooke Aquaculture, Hjaltland Seafarms (Grieg Seafood) and Loch Duart

SEPA'S "FAILING" MARINE CAGE FISH FARMS - 2015		
OPERATOR	AUTH NO	LICENCED SITE
Marine Harvest	CAR/L/1009970	Ardgour MCFF, Loch Linnhe
Marine Harvest	CAR/L/1002887	Ardnish MCFF, Loch Ailort
Marine Harvest	CAR/L/1002346	Balmeanach Bay MCFF, Sound of Raasay
Marine Harvest	CAR/L/1078064	Eilean Grianain, Carradale
Marine Harvest	CAR/L/1025571	Grey Horse Channel MCFF
Marine Harvest	CAR/L/1095612	Hellisay, Sound of Hellisay, Isle of Barra
Marine Harvest	CAR/L/1002963	Isle of Ewe MCFF, Loch Ewe
Marine Harvest	CAR/L/1003887	Kingairloch MCFF, Loch A Choire
Marine Harvest	CAR/L/1028518	Marulaig Bay MCFF, Loch Boisdale, S Uist
Marine Harvest	CAR/L/1001968	Outer Loch Skipport MCFF, Loch Skipport
Marine Harvest	CAR/L/1004080	Scotasay MCFF, East Loch Tarbert
Marine Harvest	CAR/L/1009963	Seaforth MCFF, Loch Seaforth, Isle of Harris
Marine Harvest	CAR/L/1004053	Soay Sound MCFF, West Loch Tarbert

- The 16 worst salmon farms (who all "failed" for three years out of the five years of SEPA's compliance assessment) included four sites operated by Cooke Aquaculture, four by the Scottish Salmon Company, three by Grieg Seafood, three by Marine Harvest, one by Scottish Seafarms and one by Wester Ross Fisheries.

1	AUTH NO	LICENCED SITE	PRINCIPAL CONTACT	Number of Years Not Compliant
2	CAR/L/1001809	Corry MCFF, Loch Broom	WESTER ROSS FISHERIES LIMITED	3
3	CAR/L/1016394	Druimyeon Bay MCFF, Isle of Gigha	THE SCOTTISH SALMON COMPANY LTD	3
4	CAR/L/1078064	Eilean Grianain, Carradale	MARINE HARVEST (SCOTLAND) LIMITED	3
5	CAR/L/1010773	Gob a'Bharra North MCFF, Loch Fyne	THE SCOTTISH SALMON COMPANY LTD	3
6	CAR/L/1000809	Inch Kenneth MCFF, Loch na Keal	THE SCOTTISH SALMON COMPANY LTD	3
7	CAR/L/1002963	Isle of Ewe MCFF, Loch Ewe	MARINE HARVEST (SCOTLAND) LTD	3
8	CAR/L/1015765	Lax Firth East MCFF, Lax Firth	GRIEG SEAFOOD SHETLAND LIMITED	3
9	CAR/L/1004069	Mid Strome MCFF, Loch Carron	THE SCOTTISH SALMON COMPANY LTD	3
10	CAR/L/1002983	North of Papa MCFF, North Voe	GRIEG SEAFOOD SHETLAND LIMITED	3
11	CAR/L/1003106	Pobie Sukka MCFF, Ronas Voe	SCOTTISH SEA FARMS LIMITED	3
12	CAR/L/1004053	Soay Sound MCFF, West Loch Tarbert	MARINE HARVEST (SCOTLAND) LTD	3
13	CAR/L/1004035	Taing of Rallsborough MCFF, Cat Firth	GRIEG SEAFOOD SHETLAND LIMITED	3
14	CAR/L/1005091	Vee Taing MCFF, Uyea Sound	COOKE AQUACULTURE SCOTLAND LIMITED	3
15	CAR/L/1002996	Vest Ness MCFF, Papa Sound	COOKE AQUACULTURE SCOTLAND LIMITED	3
16	CAR/L/1001931	West Scargun Shoal MCFF, Wide Firth	COOKE AQUACULTURE SCOTLAND LIMITED	3
17	CAR/L/1004201	Wick of Vatsetter MCFF, South Sound	COOKE AQUACULTURE SCOTLAND LIMITED	3

Download the non-compliance data for 2011-2015 as an Excel spreadsheet [online here](#)

Read more via "[Failing Fish Farms: 18% rated 'poor' by SEPA in 2015](#)"

### **Damning Report by the Scottish Parliament in March 2018:**

 [A letter from the Environment, Climate Change and Land Reform Committee to the Committee regarding their report on the environmental impacts of salmon farming, 5 March 2018 \(1.19MB pdf\)](#)



A [report on the environmental impacts of salmon farming by the Scottish Parliament's Environment, Climate Change & Land Reform Committee \(5 March 2018\)](#) included:

110. The Committee was also keen to understand how many PMF's and MPA's have been affected by fish farms; in what locations; which features have been affected and whether licences have been adjusted or revoked. SEPA failed to provide any further information on the damage to maerl beds or to other protected features. SEPA further stated "SEPA has not had cause to reduce the permitted biomass at, or revoke the authorisation for, any fish farm for the purposes of ensuring the achievement of a protected area objective, including those for maerl." In addition, they stated "SEPA has reduced the permitted biomass at a number of farms where there were unacceptable impacts on the health of the sea bed, but this action was not taken to address impacts on maerl per se." SEPA did not provide any information on the nature of the unacceptable impacts; the number of times permitted biomass was reduced or the subsequent impact of that reduction. The Committee has written once again to SEPA on this issue.

116. The Committee asked SEPA how many unannounced visits it had made to fish farms. In revised follow up evidence SEPA provided percentages in relation to the

total number of unannounced visits which translate into the following numbers which shows a decline in the annual number of both visits and unannounced visits since 2015:

- In 2015, 14% of 174 visits were unannounced (24 unannounced visits)
- In 2016, 13% of 152 visits were unannounced (20 unannounced visits)
- In 2017, 9% of 160 visits were unannounced (14 unannounced visits)

130. The Committee asked if SEPA considers there to be gaps in the information in relation to the sea-bed in the vicinity of fish farms. In follow up correspondence SEPA referred the Committee to its general response on research and other initiatives so the Committee remains unclear as to what SEPA's view is on this important question. The Committee has written once again to SEPA.

166. John Aitchison referred to an internal document from SEPA accessed via a freedom of information request which states: "Fish farming is unique in that it is a sector which is allowed to discharge substantial quantities of biocides, some of them Priority Substances in terms of the Water Framework Directive and all at least List II substances in terms of the old EU 'Dangerous Substances Directive ... the waters in which salmon farming is practiced are usually the same waters in which Scotland's valuable crustacean fisheries are located ... it is not tenable for SEPA to adopt a position where commercial shellfish species are impacted by the day-to-day activities of fish farms."

182. The Committee is extremely concerned that SEPA may, in the past, or may currently, be permitting the discharge of priority substances and potentially damaging substances.

208. The Committee would welcome further information from SEPA on the development and implementation of a Scottish containment standard. The Committee has written to SEPA on this.

305. FMS confirmed when consenting biomass SEPA does not consider the impact of sea lice from that biomass on wild fish. "We consider that the biomass of farmed fish within a production area is a crucial factor determining the extent of any impacts on wild fish. The potential impacts of sea lice arising from farmed fish are a function both of the number of farmed fish within an area and the number of lice per fish."

307. The Committee asked SEPA, to what extent it undertakes independent monitoring and analysis, rather than relying on information provided by the sector. It also asked what additional resource is planned as a result of DZR. Some general information was provided but this was lacking in detail and it appears to the Committee that SEPA is heavily reliant on information provided by the sector and there is little independent monitoring and analysis.

314. The Committee is not convinced SEPA (or any other agency) is effectively monitoring the environmental impact of salmon fisheries. The Committee is also not convinced that the regulations, protocols and options for enforcement and prosecution for the sector are appropriate, and being appropriately deployed. The Committee understands that the industry and the regulators need to share information. The Committee is concerned that there is an over-reliance on data provided by the sector and insufficient independent monitoring and analysis by SEPA.

315. The Committee is keen to understand the resource SEPA is currently allocating to monitoring and reporting on the sector and what change in resource is planned as a result of the planned introduction of DZR and the expansion of the sector. The Committee has written to SEPA on this.

325. The Committee asked SEPA what work (including research) SEPA is engaged with, looking at solutions to the environmental issues of fish farming and alternative approaches. SEPA provided no specific detail to the Committee simply referring to the Finfish Sectoral Development Plan. From the information available to the Committee it appears that other than SEPA's engagement with the work of SARF on closed containment production the Committee must conclude that little proactive work is being done by SEPA to look at solutions and alternative approaches. The Committee would also be interested to understand what related research Marine Scotland Science is engaged in.

A [letter in reply from SEPA's Chief Executive \(28 March 2018\)](#) included:

**1. What were these unacceptable impacts and how were they identified? (p. 110 of the ECCLR Committee's report)**

The impacts were pollution of the sea bed. They were identified on the basis of environmental samples showing that:

- a) the diversity and abundance of the invertebrates had been so altered that pre-defined environmental standards for the condition of those invertebrates were breached. Breaches of the standards that apply close to the cages mean that impacts are so severe that even populations of those animals that are able to cope best in polluted conditions and breakdown organic wastes are reduced to very low numbers and low diversity; or
- b) concentrations of fish farm medicines were in excess of environmental standards and hence at levels likely to result in adverse effects on the health and diversity of invertebrate animals.

The majority of the samples used to identify these impacts were quality assured samples provided to us by the fish farmers in accordance with monitoring conditions specified in their licences.

<b>Sea bed monitoring results for the period 01/01/2015 to 31/12/2017</b>		
	Emamectin benzoate sampling results	Sea bed invertebrate survey results
Number of samples/surveys	466 results (188 farms)	312 surveys (224 farms)
Number of samples/surveys showing unacceptable impacts	38 (29 farms)	91 surveys (76 farms)

i.e. 15% of fish farms (29 out of 188) showed "unacceptable impacts" for Emamectin benzoate contamination of the sea bed and 34% of fish farms (76 out of 224) showed "unacceptable impacts" on sea bed invertebrates.

## **SEPA staff joining Marine Harvest as 'Head of Environment & Regulatory Affairs' and 'Applications Manager':**

### **- Ewan Gillespie:**

Ewan Gillespie was a [senior scientist at SEPA for 21 years from 1990 to 2011](#) - including managing SEPA's marine science work in the regulation of the marine aquaculture industry. In 2002, he worked with Marine Harvest on a [SNH project to assess the impact of fish farms on maerl](#). In 2006, he co-authored the scientific paper: "[Impact of fish farms on maerl beds in strongly tidal areas](#)".

"My own view on regulation is that both regulator and 'regulatee' must work in close co-operation with one another," wrote [Ewan Gillespie, Marine Harvest's Head of Environment and Regulatory Affairs, in a letter to SEPA's Chief Executive in August 2016](#):



19 August 2016

Dear Mr A'Hearn,

I would like to take this opportunity to introduce myself to you and to begin an open and constructive dialogue with you and your SEPA colleagues.

I have recently taken up a position with Marine Harvest as their Head of Environment and Regulatory Affairs, based in their Fort William office. I have been given a fairly wide-ranging remit, covering a number of activities, some of which have potential negative impacts upon the environment. For example, one of the important work areas is the need for Marine Harvest to improve its ability to reduce the benthic impact below and around its marine sites and to better meet SEPA's environmental standards. As a company we are committed to reducing our environmental footprint and overall use of finite resources and are investing heavily in technology and systems to achieve this. Another of my more pressing tasks is to prepare the company for the forthcoming change to the way that SEPA operates its licensing regime for marine aquaculture, with the pending launch of the Deposition Zone Regulations (DZR). We are hopeful that this system may be of use to us but at this late point in the process we do not know the detail of how it will work and are having to make some fundamental assumptions in our preparations. We look forward to being able to take part in the formal consultations that will be forthcoming and hope that the final package will have benefits to us.

My own view on regulation is that both regulator and 'regulatee' must work in close co-operation with one another to achieve the aims of the prescribed legislative framework; there is not 'one side or another'. In order to do this we must be able to conduct open and, sometime, frank discussion with each other.

In summary, I look forward to my new role within Marine Harvest and to working constructively with you and your staff.

Yours sincerely

Ewan Gillespie  
Head of Environment and Regulatory Affairs

Cc D.Sinclair – Orkney  
A.Rosie - Dingwall

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	PORTAL	MAIL ewan.gillespie@marineharvest.com	
		WEB http://marineharvest.com	

## - Stephen Macintyre:

In September 2016, [Stephen Macintyre was working for SEPA as a Senior Environment Protection Officer](#):

**From:** [Macintyre, Stephen](#)  
**To:** ["kate.mcintyre@scottishseafarms.com"](mailto:kate.mcintyre@scottishseafarms.com)  
**Subject:** Thermolicer & need for additional cage  
**Date:** 02 September 2016 14:57:37  
**Attachments:** [image001.png](#)

Thanks Kate – the principle of this is good and we would seek to minimise regulatory implications. As you outline there are some issues that we will need to consider further with a view to hopefully developing and agreeing some rules that, in preference to site by site considerations, could perhaps be applied uniformly. I have passed this on to colleagues in SEPA's Aquaculture team and we will come back to you in due course.

Regards  
Stephen

Stephen MacIntyre, Senior Environment Protection Officer  
West Highland and Argyll Team, Scottish Environment Protection Agency, Carrs Corner, Lochybridge, Fort William PH33 6TQ  
t: 01397 704426 e: [stephen\\_macintyre@sepa.org.uk](mailto:stephen_macintyre@sepa.org.uk) web: [www.sepa.org.uk](http://www.sepa.org.uk)

His work included the [successful prosecution of a fish farm in 2006 resulting in a fine of £8,000 for Kames Fish Farming](#).

In September 2017, he re-surfaces as the Applications Manager for Marine Harvest now arguing that SEPA do not take action against salmon farms operated by Marine Harvest and Kames Fish Farming:

**From:** MacIntyre, Stephen [mailto:Stephen.MacIntyre@marineharvest.com]

**Sent:** 26 September 2017 12:25

**To:** Gritten, Barbara <barbara.gritten@SEPA.org.uk>

**Cc:** Jamie McAndrew <JamieMcAndrew@kames.co.uk>; Craignish Kames <craignish@kames.co.uk>; Coetzer, Duane <Duane.Coetzer@marineharvest.com>; Gillespie, Ewan <Ewan.Gillespie@marineharvest.com>; Lynne Coley <lynnecoley@kames.co.uk>; Montague, Michael <Michael.Montague@SEPA.org.uk>

**Subject:** CAR/L/1020918 Port na Moine

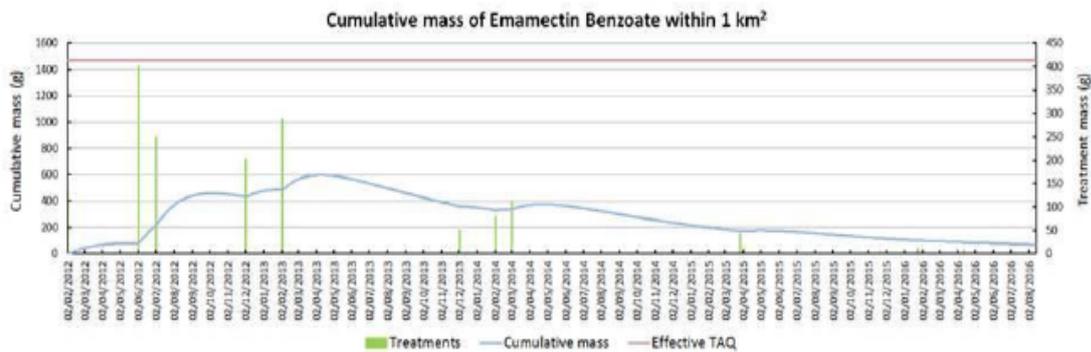
**Authorisation Reference - CAR/L/1020918**

**Port Na Moine Marine Cage Fish farm**

Dear Barbara,

I would refer to your recent e-mails relating to Slice residue and benthic sampling results at the Port na Moine fish farm. We note the issues identified have resulted in an interim Compliance Assessment for 2017 of Good. The issues have been discussed between Marine Harvest (Scotland) Ltd [as the CAR licence Responsible Person] and Kames Fish Farming Ltd [as the site operator] and I would refer you to the following commitments and actions in response.

On the issue of Slice, the site modelling was originally done on the basis of a maximum biomass of 1238 tonnes so it's surprising that the recent low scale Slice treatments have resulted in far field EQS breaches. I suspect this could be linked to previous Slice treatments in Loch Craignish which have historically been of greater scale and frequency over the past 10 years or interactions from Slice treatments carried out at farms outwith Loch Craignish, possibly resulting in areas of residue accretion by localised hydrographic conditions. However to address, moving forward Kames and MHS will give a commitment to reduce Slice usage at the site to 40% of the TAQ during future production cycles. This accords in with the interim voluntary approach that SEPA is requesting of operators. In practice this will maintain the Slice treatment pattern at an approx. equivalent of x2 treatments per cycle. It is also worth noting that the scale of EQS breach is declining over the 3 residue samplings at the site to date and a continuation of the recent reduced scale and frequency of Slice treatments should bring sediment quality under EQS in time when you factor in half-life residue decay rates. The Slice retreat spreadsheet for the site illustrates this -



Additionally the continued utilisation of functional feeds at the site, such as "Shield" will enhance the natural ability of fish to fight parasites before attachment by increasing the proportion of mucous cells in skin tissue. Trials show that farmed fish fed with "Shield" can result in decreased sea lice attachment.

On the issue of benthic impact, we note the Borderline classification of the last (2017) monitoring survey and the SEPA comment on the latest assessment report of declining sediment quality at AZE stations since the 2015 survey. During the next production cycle, operational practices will be reviewed and carefully considered in order to reduce the pressure upon the seabed. We believe that refining operational practices (including the approach to site stocking, grading and harvesting) will result in improvements in benthic fauna quality. Considering that recent production cycles have been significantly below licensed levels with regards to fish production it is also appropriate to consider if the Autodepomod model is able to accurately predict the potential impacts of the fish farm on the receiving environment. In some applications it has been recognised the model may produce low confidence predictions and with the recent development of NewDepomod any previous modelling predictions can now be reviewed and any identified shortfalls addressed. There is also a commitment therefore to collect new hydrographic data at the site and undertake new modelling simulations of the site with a view to establishing a more appropriate benthic sampling strategy. We will keep you advised of progress in this regards.

I hope the actions above demonstrates the commitment of Kames / MHS to ensure that site operations do not result in adverse environmental impacts.

Regards  
Stephen

Stephen Macintyre

Applications Manager  
MARINE HARVEST SCOTLAND LTD

Mobile:  
E. Mail: [Stephen.Macintyre@marineharvest.com](mailto:Stephen.Macintyre@marineharvest.com)

Office: Marine Harvest (Scotland) Ltd  
Stob Ban House  
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PH33 6RX

## Toxic chemical ban on Emamectin benzoate reversed following lobbying by industry despite damning report showing lethality to lobsters:

In March 2017, The Ferret [reported](#):



**The Scottish Environment Protection Agency (Sepa) secretly ditched a plan to ban a toxic pesticide contaminating sea lochs and killing wildlife after pressure from the fish farming industry.**

Sepa had been intending to prevent salmon farmers from using [emamectin](#) to kill sea lice in 2018, but dropped the idea when the [Scottish Salmon Producers' Organisation \(SSPO\)](#) warned that it would "undermine commercial confidence in the industry".

The Ferret [reported](#) in November 2017:

# How the Scottish Government 'nuanced' away fish farm pesticide ban

Rob Edwards on November 7, 2017

**The Scottish Government put pressure on its environmental watchdog to drop a plan to ban a toxic pesticide in 2018 so as not to upset the fish farming industry.**

Emails released by the [Scottish Environment Protection Agency \(Sepa\)](#) reveal that senior government officials intervened directly to delete any mention of the proposed 2018 ban from a policy briefing for the environment minister, [Roseanna Cunningham](#), following a complaint from the industry.

The pesticide, known as [emamectin](#) and marketed as [Slice](#), is widely used by fish farmers to kill the lice that plague caged salmon. But new [scientific evidence](#) suggests it is also causing widespread damage to wildlife in Scotland's sea lochs.

The Scottish Government has previously dismissed accusations that it "muzzled" Sepa on Slice as "unsubstantiated and false". It told [The Ferret in June](#) that officials didn't make "any recommendation" on how to proceed.

But the emails show that government officials persuaded Sepa to "nuance" policy by omitting the 2018 deadline because it was regarded as a "ticking bomb" by the £1.8 billion salmon farming business.

This latest revelations on the "Slicegate" scandal have prompted critics to accuse the government of a "cover-up" and of "misleading the public". Sepa had been "lobotomised" by civil servants acting on behalf of the industry, alleged one campaigner.

Read more via ["Slicegate: Anatomy & Chronology of an Environmental Lobotomy"](#) (November 2017)

In December 2017, The Ferret [reported](#):



## Scotland's green watchdog wined and dined by polluters

Rob Edwards on December 5, 2017

**The Scottish Environment Protection Agency (Sepa) has been repeatedly wined and dined by the fish farming, whisky and power industries, prompting questions to be raised about its impartiality.**

Information [released by Sepa](#) reveals that 13 board members and senior officials have been treated to 16 meals over the last two years. Five were paid for by fish farming firms, three by the whisky industry, three by power companies and five by other business groups.

Pollution from caged salmon farms, whisky distilleries and power plants is regulated by [Sepa](#), and has caused multiple problems in the past. The Ferret [has reported](#) how Sepa bowed to pressure from the fish farming industry to drop a proposed ban on a toxic pesticide harming wildlife in sea lochs.

Critics have accused Sepa of being “schmoozed” by polluters and are demanding a shake-up. Sepa, however, insists its engagement with companies is “entirely appropriate” and strongly defends its impartiality and independence.

The way Sepa regulates fish farming is undergoing a [major review](#), with deep divisions between industry and environmentalists on the way forward. The industry is [planning to double](#) its business from £1.8 billion in 2016 to £3.6 billion by 2030.

In March 2017 Sepa board member, [Bill McKelvey](#), and Sepa’s then head of regulatory services in the north, [Anne Anderson](#), attended an anniversary dinner hosted by the [Scottish Salmon Producers’ Organisation \(SSPO\)](#), which represents fish farmers.

Anderson was also given breakfast by two fish farming companies in June 2017, [Marine Harvest](#) and [Loch Duart Salmon](#). Sepa’s chief executive, Terry A’Hearn, was given dinner by SSPO in November 2015 and April 2016.

**Rubber-stamping of expansion with new 'super-size' salmon farms over 2,5000 tonnes in the pipeline (despite over 858 biomass exceedances between 2002 and 2016):**

The Sunday Herald [reported](#) in December 2013 that SEPA had approved 585 fish farm applications since 2006 and refused only one application:

GIVING FISH FARMS THE GO-AHEAD		
PUBLIC BODY	APPROVED	REJECTED
Scottish Environment Protection Agency	585 since 2006	1
Highland Council	66 since 2003	2
Comhairle nan Eilean Siar	73 since 2008	1
Argyll & Bute Council	32 since 2003	2

Spreadsheets are available to download giving the detailed information on approvals released by the Scottish Environment Protection Agency [here](#) and [here](#)

Read more via "[Scottish ministers accused of being ‘in bed’ with the fish farming industry](#)"

In January 2017, The Sunday Herald [reported](#):

# The Herald

sundayherald

## Plans to scrap fish farm limits slammed



PLANS to scrap limits on the amount of salmon that can be kept at fish farms around the coast would increase disease, worsen pollution and harm wild fish, campaign groups are warning.

The Scottish Environment Protection Agency (Sepa) is about to propose abandoning long-established limits on the mass of salmon that can be farmed in cages at particular locations in order to support the industry's "growth agenda".

The limits help reduce salmon overcrowding and seabed contamination from pesticides and waste, as well as controlling infestations by sea lice, which can affect wild fish. But they have been breached over 800 times at Scottish fish farms since 2002.

GAAIA [reported](#) in January 2017:

In Scotland, there are many sites with a maximum biomass limit of 2,500 tonnes with an industry average of 1,159 tonnes. Even with such high biomass limits there have been significant breaches of biomass limits:

Year	Biomass Exceedence (t)	Top 20 Biomass Exceedences (t)	Operator	Maximum Biomass Allowed (t)	Receiving Water	Local Authority
01-Jul-02	827	East of Hildasay	Scottish Sea Farms Ltd	1500	The Deeps	Shetland Islands
01-Mar-14	800	Poll na Gille	Marine Harvest (Scotland) Ltd	1500	Sound of Jura	Argyll and Bute
01-Feb-14	778	Poll na Gille	Marine Harvest (Scotland) Ltd	1500	Sound of Jura	Argyll and Bute
01-Mar-03	717	Mid Taing	Cooke Aquaculture Scotland	500	Gruting Voe	Shetland Islands
01-Jan-14	682	Poll na Gille	Marine Harvest (Scotland) Ltd	1500	Sound of Jura	Argyll and Bute
01-Feb-03	675	Mid Taing	Cooke Aquaculture Scotland	500	Gruting Voe	Shetland Islands
01-Jan-02	581	Mid Loch Shell / Pairc - West (A & B cage groups)	Marine Harvest (Scotland) Ltd	1331	Loch Shell	Eilean Siar
01-Jun-03	573	Dales Voe (South)	Hunter Salmon	100	Dales Voe, Delting	Shetland Islands
01-Apr-10	569	Maol Ban	Marine Harvest (Scotland) Ltd	2250	Inner Sound	Highland
01-Aug-07	565	Erisort, North Shore West	Marine Harvest (Scotland) Ltd	1650	Loch Erisort	Eilean Siar
01-Dec-12	549	Callert (Leven)	Marine Harvest (Scotland) Ltd	1450	Loch Leven	Highland
01-Jun-02	517	East of Hildasay	Scottish Sea Farms Ltd	1500	The Deeps	Shetland Islands
01-Nov-07	514	Erisort, North Shore West	Marine Harvest (Scotland) Ltd	1650	Loch Erisort	Eilean Siar
01-Jun-07	508	Ardgour (Linnhe)	Marine Harvest (Scotland) Ltd	2500	Loch Linnhe	Highland
01-Aug-02	505	East of Hildasay	Scottish Sea Farms Ltd	1500	The Deeps	Shetland Islands
01-Oct-07	495	Erisort, North Shore West	Marine Harvest (Scotland) Ltd	1650	Loch Erisort	Eilean Siar
01-Feb-02	491	Mid Loch Shell / Pairc - West (A & B cage groups)	Marine Harvest (Scotland) Ltd	1331	Loch Shell	Eilean Siar
01-Jun-08	485	Wick of Belmont North	Cooke Aquaculture Scotland	1720	Bluemull Sound	Shetland Islands
01-Aug-07	482	Isle of Ewe	Marine Harvest (Scotland) Ltd	1027	Loch Ewe	Highland
01-May-03	480	Dales Voe (South)	Hunter Salmon	100	Dales Voe, Delting	Shetland Islands

In fact, since 2002 there have been over 858 biomass exceedances totalling 74,284 tonnes with Marine Harvest alone accounting for 24,539 tonnes of exceedances:

<b>858 exceedances (2002-2016) totalling 74,284 tonnes</b>
<b>Marine Harvest (#249) = 24,539 t</b>
<b>The Scottish Salmon Company (#245) = 17,301 t</b>
<b>Cooke Aquaculture (#128) = 12,551 t</b>
<b>Scottish Sea Farms (#78) = 6,503 t</b>
<b>Grieg Seafood (#49) = 4,294 t</b>
<b>Loch Duart (#18) = 920 t</b>

Download an Excel spreadsheet of data obtained from SEPA [online here](#)

Read more via "[Recipe for Ruin - SEPA Lifts Limits on Salmon Farms](#)"

In February 2017, The Ferret [reported](#):

## Outrage over secret plan for giant salmon farm in Scotland

Rob Edwards on February 7, 2017

**Secret and lucrative plans for the world's biggest salmon farm around Orkney or Shetland would "abjectly" fail pollution limits and make "fools" of Scotland's environmental watchdog, according to internal documents published by The Ferret.**

The [Scottish Environment Protection Agency \(Sepa\)](#) has been privately considering proposals for a 6,000-8,000 tonne caged fish farm that its own expert says would be "utterly unsustainable", threaten Sepa's credibility and profit industry to the tune of tens of millions of pounds.

The amount of faecal waste from the two-million-fish mega-farm proposed by multinational companies would be equivalent to the sewage from between 400,000 and 800,000 people, one Sepa report estimates. The population of Glasgow city is about 600,000.

The revelations have been greeted with shock and horror by environmentalists, who question why such a hugely damaging scheme is even being countenanced by Sepa. The fish farming industry, however, defends the plan as an "alternative approach" that would bring jobs, benefit the economy and improve sustainability.

[Memos and emails released by Sepa](#) under freedom of information law reveal that active proposals for a large "innovation" salmon farm were discussed with companies and the Scottish Government in 2015 and 2016. Orkney and Shetland were suggested as locations.

The proposal would smash Sepa's current 2,500-tonne limit on fish farms, the documents pointed out. "The best available predictive models suggest it will be utterly unsustainable," said [an internal Sepa briefing in May 2016](#).

Read more via "[Outrage over secret plans to base world's biggest salmon farm in Scotland](#)"

Fish Farming Expert [reported](#) in September 2017:

## **9,000 tonnes**

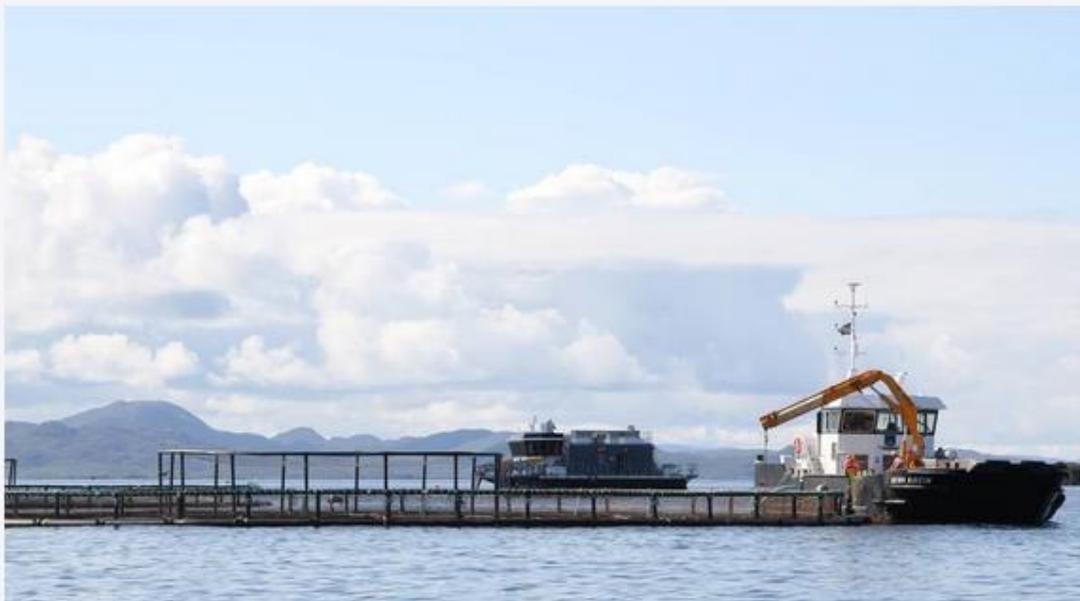
Scotland's biggest fish farmer, Marine Harvest, has four applications for new farms - Rum, South Uist, Sconser and Scalpay - which together would add just short of 9,000 tonnes of biomass. It has a further six CAR applications for alterations to existing licences.

Cooke Aquaculture Scotland wants a CAR licence for a new 2,500 tonne site at Westray, Orkney, and trout farmer Kames is waiting for a licence for a new farm - again with the maximum allowed 2,500 tonne biomass - at Dounie, Sound of Jura. The Scottish Salmon Company wants variations to licences to increase biomass at sites on Loch Fyne, and off Harris and Arran, and Grieg Seafood Scotland is also seeking a biomass increase at its Bight of Foraness site.

Fish Farming Expert [reported](#) in April 2018:

Home > News > Marine Harvest bids for bigger biomass consent on Muck

## Marine Harvest bids for bigger biomass consent on Muck



Marine Harvest hopes to gain its first fish farm consent for more than the previous de facto Scottish maximum biomass of 2,500 tonnes as part of plans to expand its high-performing farm off the Isle of Muck.

By [Gareth Moore](#)

The company has submitted a planning application to Highland Council to increase production at its salmon farm by extending its boundaries and adding two new pens to the 10 existing 120m-diameter pens.

This would allow for an increase in production from 2,500 to 3,500 tonnes, and MH Scotland has applied to the Scottish Environment Protection Agency (SEPA) for a variation in its Controlled Activities Regulations (CAR) licence to allow for the extra fish.

**The use of the toxic chemicals Azamethiphos, Cypermethrin, Deltamethrin and Emamectin benzoate increased 1000% between 2006 and 2016:**

The Sunday Times [reported](#) in January 2017:

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## Salmon industry toxins soar by 1000 per cent

Mark Macaskill

January 1 2017, 12:01am,  
The Sunday Times



Between 2006-16, farmed salmon production increased by 35 per cent while the use of chemicals to control flesh-eating lice rose 932 per cent.

The use of toxic chemicals to fight sea lice on Scottish salmon farms has soared by almost 1,000% in the past decade, according to official data that has sparked fresh criticism of the billion-pound industry.

Between 2006-16, farmed salmon production increased by 35% while the use of chemicals to control flesh-eating lice rose 932%.

They included compounds that have been linked to reduced fertility in wild salmon and mortality in shellfish such as lobsters.

Critics of salmon farming said this weekend that the growing use of chemicals to fight sea lice, a parasite that kills millions of farmed fish every year, raises serious questions about the industry's environmental impact.

It has rekindled calls for some of Britain's leading supermarkets to ban the sale of farmed salmon from parts of Scotland where sea lice infestations are "rampant" and pose a threat to the survival of wild salmon and sea trout.

"Scottish salmon farming is fighting a losing battle against chemically resistant sea lice," said Don Staniford of the Global Alliance Against Industrial Aquaculture. "The drugs don't work anymore. Sadly, Scotland's lobsters and other shellfish are collateral damage in the salmon farming industry's war on sea lice."

The latest figures, obtained under freedom of information from the Scottish Environment Protection Agency (Sepa), show that Scottish salmon farms used 45kg of chemicals in 2006 but this increased to 467kg in 2016.

Read more via [The Sunday Times: "Salmon industry toxins soar by 1000 per cent"](#)

### **Chemical pollution of Scottish lochs - testing between 2006 and 2016 showed 45 lochs contaminated with Emamectin benzoate and Teflubenzuron:**

The Sunday Herald [reported](#) in February 2017:



**sunday herald**

@newsundayherald

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Revealed: scandal of 45 Scottish lochs  
trashed by pollution

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AT least 45 lochs around [Scotland](#)'s coast have been contaminated by toxic pesticides from fish farms that can harm wildlife and human health, according to data released by the Scottish Environment Protection Agency (Sepa).

Levels of chemicals used to kill the sea lice that plague caged salmon have breached environmental safety limits more than a hundred times in the last 10 years. The chemicals have been discharged by 70 fish farms run by seven companies.

The pollution has been condemned as a "toxic timebomb" by environmental campaigners, who are lodging a formal complaint with the European Commission. The fish farming industry, however, insists that it always tries to abide by the rules.

Sepa released a spreadsheet under freedom of information law showing the results of over 1,200 sampling operations at about 280 fish farms. It revealed that between 2006 and 2016 levels of anti-sea lice pesticides found in sediment 100 metres away from salmon cages exceeded environmental quality standards in 45 sea lochs and inshore waters.

They included Loch Linnhe, Loch Kishorn, Loch Nevis, Loch Ewe, Loch Torridon and ten others in the Highland region. There were 11 contaminated lochs and waters in Argyll and Bute, including Loch Fyne, Loch Creran, the Firth of Lorn, and the sounds of Mull, Jura and Gigha.

Another 11 voes and firths around the Shetland islands were polluted, as were seven in the Western isles and Lamlash Bay in North Ayrshire (see table). The companies named as responsible included Marine Harvest, Scottish Sea Farms, The Scottish Salmon Company and Grieg Seafood Shetland.

The main pesticide detected was emamectin benzoate. According to Sepa, it "is toxic to birds, mammals, fish and other aquatic organisms, particularly those living on the sea bed".

Here's the table of contaminated lochs:

## THE 45 CONTAMINATED LOCHS

Inner Sound, Highland	Kilbrannan Sound, Argyll and Bute	Lax Firth, Shetland
Loch a Chairn Bhain, Highland	Loch Craignish, Argyll and Bute	Off Lunaness, Shetland
Loch Alsh, Highland	Loch Creran, Argyll and Bute	Olnafirth, Shetland
Loch Bracadale, Highland	Loch Fyne, Argyll and Bute	Ronas Voe, Shetland
Loch Broom, Highland	Loch Spelve, Argyll and Bute	Swarbacks Minn, Shetland
Loch Duich, Highland	Loch Tuath, Argyll and Bute	The Deeps, Shetland
Loch Ewe, Highland	Shuna Sound, Argyll and Bute	East Loch Tarbert, Eilean Siar
Loch Kishorn, Highland	Sound of Gigha, Argyll and Bute	Loch Boisdale, Eilean Siar
Loch Laxford, Highland	Sound of Jura, Argyll and Bute	Loch Erisort, Eilean Siar
Loch Linnhe, Highland	Sound of Mull, Argyll and Bute	Loch Roag, Eilean Siar
Loch Nevis, Highland	Cat Firth, Shetland	Loch Seaforth, Eilean Siar
Loch Sunart, Highland	Clift Sound, Shetland	Loch Shell, Eilean Siar
Loch Torridon, Highland	Clousta Voe, Shetland	Loch Skipport, Eilean Siar
Sound of Raasay, Highland	Colla Firth, Shetland	Lamlash Bay, North Ayrshire
Firth of Lorn, Argyll and Bute	Dury Voe, Shetland	

*Source: Scottish Environment Protection Agency*

Read more via "[Revealed: Scandal of 45 Scottish lochs trashed by pollution](#)"