



Competition and Markets Authority
25 Cabot Square
London
E14 4QZ
general.enquiries@cma.gov.uk

16 February 2022

Dear Sir/Madam,

Complaint Vs ‘Organic’ Salmon Sold by Ocado & Sainsbury’s with false green claims; namely: “responsibly sourced”, “farmed responsibly”, “responsible use of the environment” and “raised responsibly”& “100% Scottish”

Please consider this a formal complaint by Scamon Scotland against Ocado and Sainsbury’s and their supplier Mowi for breaches of trading and advertising standards over ‘organic’ Scottish salmon certified by the Soil Association and the Aquaculture Stewardship Council. Scamon Scotland maintains that the marketing and advertising of ‘organic’ Scottish salmon as “responsibly sourced” and “farmed responsibly” represents a breach of [The Consumer Protection from Unfair Trading Regulations 2008](#) with respect to [Regulation 5 \(Misleading Actions\)](#) and [Regulation 6 \(Misleading Omissions\)](#).

 **Don Staniford**
@TheGAAIA

Complaint filed vs @Ocado & @sainsburys for deceptive marketing of "responsibly sourced" Scottish salmon with Trading Standards @CMAgovUK
Breach of the 'Green Claims Code' over marketing of @MowiScotlandLtd 'organic' salmon @SoilAssociation @SoilAssocScot tinyurl.com/mr3bzpwu



ASC and 9 others

8:26 AM · Feb 16, 2022 · Twitter Web App

Scamon Scotland (formerly Scottish Salmon Watch) maintains that Ocado and Sainsbury's – as well as their supplier Mowi and certifiers (the Soil Association, Aquaculture Stewardship Council and RSPCA Assured) - are in breach of the ['Green Claims Code' published by the Competition and Markets Authority in September 2021](#):



Guidance

Green claims code: making environmental claims

Guidance for businesses making environmental claims in the UK

From: [Competition and Markets Authority](#)

Published 20 September 2021



[Making environmental claims on goods and services: printable version](#)

PDF, 505KB, 56 pages

Specifically in relation to 'business-to-consumer claims' [detailed on p8-9](#):

Business-to-consumer claims

- 2.20 Where claims are ultimately aimed at consumers, this guidance will apply, even if the claims are made by a manufacturer, wholesaler or distributor which does not have direct contact with a consumer.
- 2.21 In some cases, retailers and wholesalers (or manufacturers) could be liable for claims under consumer protection legislation. For example, retailers who sell products featuring misleading environmental claims made by manufacturers or wholesalers on their packaging can be liable for those claims (as well as the manufacturer or wholesaler). Retailers should assure themselves that any such claims are accurate and not misleading.
- 2.22 Online marketplaces also have responsibilities where they allow sellers to market products via their platform. They can be liable in relation to misleading environmental claims where they:
 - do not take adequate steps to ensure that products being sold on their platform comply with the law, for example, by taking steps to prevent misleading claims and removing claims which they know to be misleading;

Scamon Scotland's complaint is published online today via:
[Complaint vs Ocado & Sainsbury's 'Organic' Scottish Salmon "Farmed Responsibly" by Mowi Filed with Trading & Advertising Standards](#)

As background to our complaint, Scamon Scotland [filed an online complaint with Ocado on 3 February](#) but on 7 February Ocado passed the buck onto Mowi and failed to provide any evidence to substantiate their green claims:

“Having investigated together with the supplier, we can confirm that all organic salmon from Mowi is sourced from farms that are fully accredited by the Soil Association. Rest assured, we have very high standards for all our suppliers when it comes to the welfare of animals. If you have any specific queries relating to Mowi products, we'd suggest you contact them directly.”

Scamon Scotland's [request to Mowi on 8 February](#) to provide substantive evidence to back up their claims has gone unanswered and as of today (16 February 2022) Ocado has failed to remove the misleading claims. Hence this complaint to Trading Standards (copied to Advertising Standards).

Correspondence with Ocado and Mowi is attached as an Appendix and is available online via:
[Mowi Challenged to Back Up 'Green Claims' \(After Ocado Pass the Buck\)!](#)
[Mowi's "100% Scottish" Salmon Imported from Ireland - 100% 'Organic' Bullshit!](#)
[Organic Scamon: Ocado Challenged Over Mowi's 'Responsibly' Farmed Salmon - 100% Bullshit not 100% Scottish!](#)



Scamon Scotland’s complaint focuses on Ocado and Sainsbury’s ‘organic’ Scottish salmon (both sourced from Mowi). Here’s the [online marketing from Ocado for ‘Mowi Organic Smoked Salmon Slices’](#) (another product – Mowi Organic Salmon Fillets – is also [marketed online](#)):



Mowi Organic Smoked Salmon Slices 100g

£6 ~~£7~~

£60 per kg

★★★★☆ (4) [Leave a review](#)

Add to trolley



Intro Offer: Save £1, will be £7
Intro Offer: Save £1 when you order by 15/02/2022. Offer subject to availability. Maximum 18 promotional items per customer.

Overview **Information** Categories Reviews

Product information

Description ^

Certified as Organic by Soil Association, MOWI Organic salmon fillets are 100% Scottish and raised responsibly in the cool, clear coast waters off the West of Scotland. These beautiful salmon are hand selected and expertly cured and smoked over beech and oak chippings by MOWI kilnsmen over many houses.
Ready to eat.
We ensure every serving of MOWI salmon is high in Omega 3. Each portion typically has 850mg of Omega 3 fatty acids every day contributes to the normal function of the heart.
The Omega symbol is in our name.
MOWI organic salmon (and their feed) is fully traceable plus independent and regularly audited to ensure a responsible use of the environment.
RSPCA Assured - Certification Mark, The salmon in this product is from a producer inspected to RSPAC welfare standards by the RSPA's independently certified farm assurance scheme.

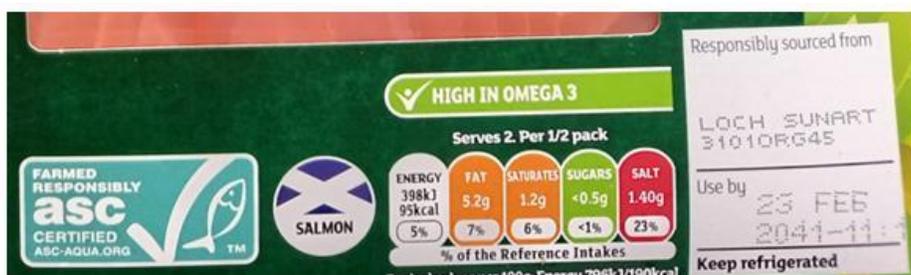
Country of Origin

Scotland, UK

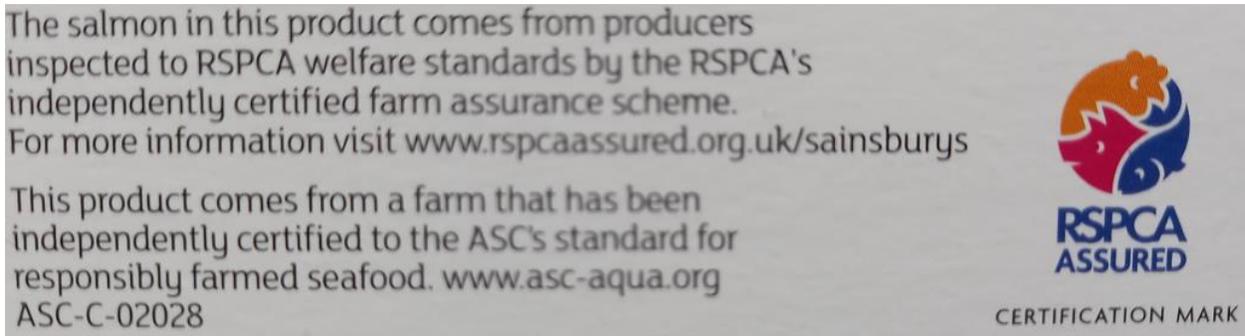
Here's a photo of Sainsbury's 'So Organic' Scottish smoked salmon bought in their store in Upton on the Wirral on Saturday 12 February 2022:



The packaging features the “Farmed Responsibly” ASC logo on the front (with the RSPCA logo on the back) although the [online marketing](#) still features the RSPCA logo on the front:



The offending Sainsbury's product carries the false green claim "responsibly sourced" on the front of the pack and on the back it claims that "this product come from a farm that has been independently certified to the ASC's standard for responsibly farmed seafood":



The 'organic' Scottish salmon products sold by Ocado and Sainsbury's are clearly marketed to consumers as green and environmentally responsible. Scamon Scotland believes these green claims represent a clear cut case of deceptive marketing and false advertising.



Scamon Scotland takes issue with the specific green claims made by Ocado and Sainsbury's; namely:

- 1) "Responsibly Sourced"
- 2) "Raised Responsibly"
- 3) "Responsible Use of the Environment"
- 4) "Farmed Responsibly"
- 5) "Responsibly Farmed"

We ask Trading Standards to investigate these claims and for them to be removed from the marketplace accordingly.

Before substantive evidence is presented against the above green claims, another false claim by Ocado can be easily addressed. The [marketing blurb for Ocado's 'organic' Mowi salmon](#) claims that "MOWI Organic salmon fillets are 100% Scottish". This is patently untrue since Mowi imports salmon eggs (ova) and young salmon (parr and smolts) from Ireland for on-growing in Scotland.

As Scamon Scotland [reported earlier this month \(8 February 2022\)](#):

A Freedom of Information disclosure by the Scottish Government late last week (4 February 2022) blows out of the water marketing and advertising claims made by online supermarket Ocado that Mowi's 'organic' salmon is "100% Scottish". Here's trade data disclosed by the Scottish Government via FOI-2022-00272899 detailing 300,000 parr (young salmon) imported from Mowi in Ireland to on-growing in [Mowi's controversial Loch Ness salmon farm](#):

Date consignment due	Trade purpose	Destination site name	Destination business name (Site operator)	Species	Stage	Number	Source Country	Import consignor	Import Site of Origin
19/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
19/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
19/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
20/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
20/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
16/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
16/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
16/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91400	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
17/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
17/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
17/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91400	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit

* Imports of parr to freshwater site

Scottish Salmon Watch [reported last month that the vast majority of ova used on 'Scottish' salmon farms are imported from Iceland, Ireland and Norway](#) so are not "100% Scottish" as claimed by Ocado. The [FOI disclosure from the Scottish Government](#) revealed that 582,000 salmon smolts were imported from Ireland in April 2020 to on-grow on [Norwegian-owned Mowi's 'organic' salmon farms in Loch Harport and Sconser on the Isle of Skye](#):

[FOI 2021-00259890](#) details 582,000 salmon smolts imported from Mowi Ireland via three shipments from Kindrum and Lough Altan in April 2020 for ongrowing at [Soil Association certified 'organic' sites at Loch Harport and Sconser](#) on the Isle of Skye (further imports of salmon parr were imported from Ireland by Mowi to Loch Ness and are subject of a further FOI):

Date consignment due	Destination site name	Destination business name (Site operator)	Number	Source Country	Import consignor	Import Site of Origin
04/04/2020	Loch Harport	Mowi Scotland	83,000	Republic of Ireland	Mowi Ireland	Kindrum Freshwater Unit
06/04/2020	Sconser	Mowi Scotland	249,500	Republic of Ireland	Mowi Ireland	Lough Altan Smolt Unit
08/04/2020	Sconser	Mowi Scotland	249,500	Republic of Ireland	Mowi Ireland	Lough Altan Smolt Unit

Scottish Salmon Watch [reported in July 2021](#) that Mowi imported smolts from Ireland for their 'organic' salmon farm at Sconser. Case Information' [slipped out by the Scottish Government's Fish Health Inspectorate](#) revealed that the origin of Mowi's '100% Scottish' organic salmon was 100% Irish (and the ova - salmon eggs - used to source the smolts may well have originally been imported from Iceland or Norway).

Case No:	2020-0461	Date of visit:	02/11/2020
Time spent on site:	2 hours	Main Inspector:	
Site No:	FS0602	Site Name:	Sconser
Business No:	FB0119	Business Name:	Mowi Scotland Ltd

Organic stock on site. Salmon input from Ireland

Pool/Fish No				
Fish nos	1	2	3	4
Pool Group				
Species	SAL	SAL	SAL	SAL
Average weight	1.4000	1.4000	1.4000	1.4000
Sex	N/A	N/A	N/A	N/A
Water Type	SW	SW	SW	SW
Stock Details	Stock Origin	Altan Freshwater Unit, Ireland	Altan Freshwater Unit, Ireland	Altan Freshwater Unit, Ireland
	Facility No	43	44	47

Scamon Scotland now focuses on the five false green claims; namely: “Responsibly Sourced” (Sainsbury’s), “Raised Responsibly” (Ocado), “Responsible Use of the Environment” (Ocado), “Farmed Responsibly” (Sainsbury’s) and “Responsibly Farmed” (Sainsbury’s).

In terms of Sainsbury’s the ‘So Organic’ Scottish smoked salmon product claims to be “responsibly sourced” from Loch Sunart where Mowi is the only salmon farming company (at other times of the year Sainsbury’s has sold ‘organic’ salmon “responsibly sourced” from other Mowi salmon farms in Loch Harport, Sconser, Loch Leven and Loch Ewe).

The Ocado ‘organic’ Mowi salmon does not give a location but [Fish Farming Expert reported in December 2022](#):

“Mowi Scotland’s Invasion Bay farm in Loch Sunart has received organic certification from the UK Soil Association. The site is Mowi Scotland’s fourth seawater farm to attain Soil Association certification in just over a year. Its Loch Leven site gained certification towards the end of last year, and the Sconser and Harport sites on Skye were certified in March and April 2021 respectively. The company is now working on additional sites to add to the organic portfolio.”

Consumers probably believe that ‘organic’ salmon is environmentally friendly and ‘responsible’. However, salmon certified by the Soil Association is permitted to be farmed with toxic chemicals. The Soil Association should be ashamed for corroding their 'organic' principles by certifying toxic salmon farms:

[Toxic Salmon Corrodes Soil Association's 'Organic' Principles Please Ban Deltamethrin Use by Scottish Salmon Pharmers!](#)

Data sourced from the Scottish Environment Protection Agency - submitted by salmon farming companies and [published online via ‘Scotland’s Aquaculture’](#) – reveals how ‘organic’ salmon farms are using [toxic chemicals](#). For example, Mowi’s 'organic' salmon farm in Loch Sunart at Invasion Bay used 13 doses of toxic chemicals between January 2019 and June 2021 including [lobster-killing Deltamethrin and Azamethiphos](#) and [crustacean-killing Emamectin benzoate](#):

Date	Submitted By	Site Name	Deltamethrin (g)	Azamethiphos (g)	Emamectin Benzoate (g)
01-Mar-20	Mowi Scotland	Invasion Bay	70	1800.000027	0
01-May-19	Mowi Scotland	Invasion Bay	0	1700.000063	0
01-Jun-19	Mowi Scotland	Invasion Bay	0	1515.00006	307.5
01-Feb-20	Mowi Scotland	Invasion Bay	17.5	1200.000009	0
01-Mar-19	Mowi Scotland	Invasion Bay	0	600.0000238	0
01-Oct-19	Mowi Scotland	Invasion Bay	0	600.0000179	0
01-Jul-19	Mowi Scotland	Invasion Bay	0	600.0000089	0
01-Jan-19	Mowi Scotland	Invasion Bay	0	450	0
01-Jan-20	Mowi Scotland	Invasion Bay	0	400.000006	0
01-Feb-19	Mowi Scotland	Invasion Bay	0	300	0

In [data reported for July 2021](#), Mowi's 'organic' salmon farm at Invasion Bay in Loch Sunart used the [lobster-killing chemical Deltamethrin](#):

Scotland's aquaculture		part of Scotland's environment	
Home Our Aquaculture Map Data Resources Glossary Help			
Fish Farms Monthly Biomass and Treatment Reports			
Fish Farm Monthly Biomass and Treatments Details		Location Details	
Year	2021	Receiving Water	Loch Sunart
Month	July	National Grid Reference	NM73316102
Submitted By	Mowi Scotland Ltd	View on Map	View on map
Licence Number	CAR/L/1009162/C1/V2	Data supplied by SEPA on 04/12/2020	
Licence active at time of report	CAR/L/1009162		
Report for Site	INV1 Invasion Bay		
Max licensed biomass on site (tonnes)	1680		
Actual biomass on site (tonnes)	1236		
Biomass Exceedance (tonnes)	0		
Feed (kg)	307953		
Mortalities (kg)	3203.10		
Seallice Treatments Used			
Seallice Treatment Product	Quantity Used (grams)		
Azamethiphos	0		
Cypermethrin	0		
Deltamethrin	82.81		
Emamectin Benzoate	0		
Teflubenzuron	0		
Data supplied by SEPA on 04/12/2020			

Mowi's 'organic' salmon farm at Callert in Loch Leven also used the [lobster-killing chemical Deltamethrin](#) in [November 2020](#):

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Fish Farms Monthly Biomass and Treatment Reports			
Fish Farm Monthly Biomass and Treatments Details		Location Details	
Year	2020	Receiving Water	Loch Leven
Month	November	National Grid Reference	NN07995950
Submitted By	Mowi Scotland Ltd	View on Map	View on map
Licence Number	CAR/L/1009962/V7	Data supplied by SEPA on 04/12/2020	
Licence active at time of report	CAR/L/1009962		
Report for Site	CALL1 Callert (Leven)		
Max licensed biomass on site (tonnes)	1607		
Actual biomass on site (tonnes)	1765		
Biomass Exceedance (tonnes)	158.40		
Feed (kg)	409998.9		
Mortalities (kg)	2416		
Seallice Treatments Used			
Seallice Treatment Product	Quantity Used (grams)		
Azamethiphos	0		
Cypermethrin	0		
Deltamethrin	48		
Emamectin Benzoate	0		
Teflubenzuron	0		
Data supplied by SEPA on 04/12/2020			

A peer-reviewed scientific paper [published in the journal Environmental Pollution in September 2020](#) details just how toxic Deltamethrin and Azamethiphos are to shellfish:

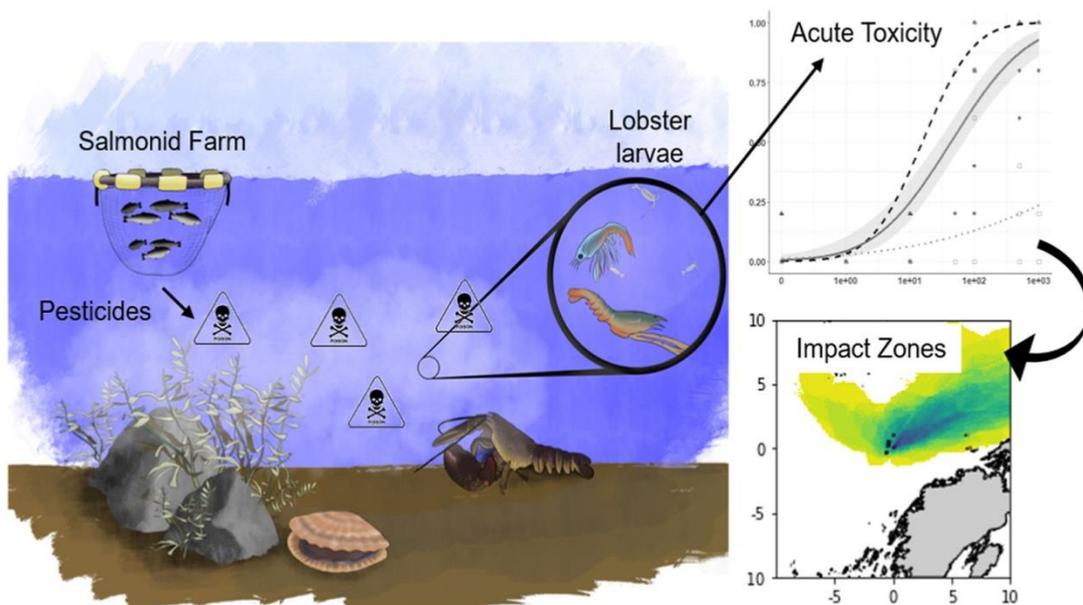


The impact of anti-sea lice pesticides, azamethiphos and deltamethrin, on European lobster (*Homarus gammarus*) larvae in the Norwegian marine environment ☆

Aoife E. Parsons ^a, Rosa H. Escobar-Lux ^{a, b}, Pål Næverlid Sævik ^a, Ole B. Samuelsen ^a ✉, Ann-Lisbeth Agnalt ^a

Highlights

- Azamethiphos and deltamethrin are acutely toxic to European lobster larvae.
- Calculated LC₅₀ and EC₅₀ values below recommended treatment doses for salmon farms.
- Azamethiphos impact zones around fish farms relatively small.
- Deltamethrin impact zones around fish farms covered large areas.
- Deltamethrin a significant risk to lobster larvae living near fish farms.



Yet [the Soil Association has recklessly and irresponsibly permitted the use of Deltamethrin under 'organic' standards for salmon farms.](#)



Don Staniford
@TheGAAIA



Toxic Salmon Corrodes Soil Association's 'Organic' Principles - will anyone stand up against the use of the toxic chemical Deltamethrin? @SoilAssociation @ClarenceHouse @dimpleby_jd @Charlotcostume @SoilAssocScot @HelenBOrganic @JoannaBlythman @peterk69 tinyurl.com/2k8kt3vw



11:20 AM · Mar 20, 2021



Don Staniford
@TheGAAIA



Think 'organic' salmon = zero toxic pesticides? Nope. "Parasite treatments, including Deltamethrin, are permitted in the organic standards" admit @SoilAssocScot @SoilAssociation Please boycott 'organically' farmed #Scottish #Salmon as well as @rspcaassured @ASC_aqua @SaumonLabel

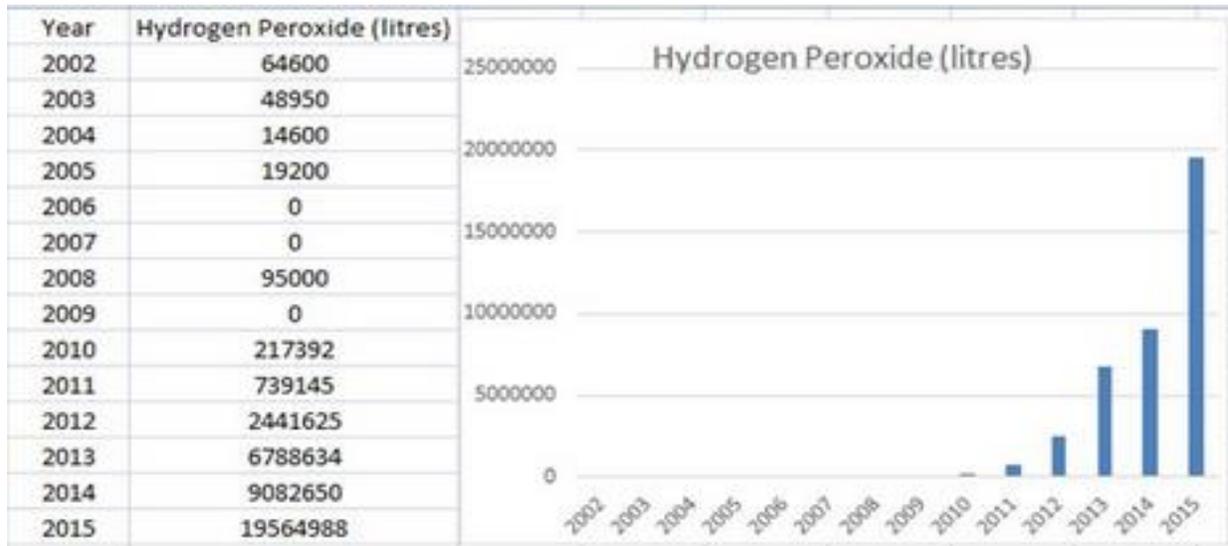


1:30 PM · Mar 30, 2021



Data for toxic chemical use since September 2021 is still not publicly available but is expected to be [published via Scotland’s Aquaculture next month](#). Even then [the data does NOT include toxic chemical use of Deltamethrin and Azamethiphos via wellboats](#) or any use of Hydrogen Peroxide ([shown by peer-reviewed science to kill shellfish](#) and [seaweeds](#)).

The Global Alliance Against Industrial Aquaculture [accessed data on the use of Hydrogen Peroxide back in 2017 via a Freedom of Information disclosure from the Scottish Environment Protection Agency](#) – detailing the use of 19.6 million litres of Hydrogen Peroxide by salmon farms in 2015 including at Marine Harvest’s (renamed Mowi in 2019) ‘organic’ salmon farm in Loch Ewe and other salmon farms now [certified as “farmed responsibly” via the ASC](#):



Site Name	Operator (at date of submission)	Local Authority	Hydrogen Peroxide (litres)
Camas an Leim (Torridon)	Marine Harvest (Scotland) Ltd	Highland	1018616
Ardintoul	Marine Harvest (Scotland) Ltd	Highland	753450
Creag an Sagairt West	Marine Harvest (Scotland) Ltd	Highland	464529
North Havra	Grieg Seafood Shetland Ltd	Shetland Islands	424000
Easter Score Holm	Grieg Seafood Shetland Ltd	Shetland Islands	417700
East of Langa	Grieg Seafood Shetland Ltd	Shetland Islands	398600
Greanamul	The Scottish Salmon Company Ltd	Eilean Siar	394091
Poll na Gille	Marine Harvest (Scotland) Ltd	Argyll and Bute	387150
Sgeir Dughall	The Scottish Salmon Company Ltd	Highland	382272
Rubh an Trilleachain	Kames Fish Farming Ltd	Argyll and Bute	376000
Isle of Ewe	Marine Harvest (Scotland) Ltd	Highland	369250
Spoose Holm (Oxna)	Grieg Seafood Shetland Ltd	Shetland Islands	368600
Aird Ardheslaig	The Scottish Salmon Company Ltd	Highland	343548
West of Burwick	Grieg Seafood Shetland Ltd	Shetland Islands	335700
Soay Sound	Marine Harvest (Scotland) Ltd	Eilean Siar	287455
Sron	Marine Harvest (Scotland) Ltd	Highland	281700
Papa, East Head of Scalloway	Grieg Seafood Shetland Ltd	Shetland Islands	277000
Stulaigh Island	Marine Harvest (Scotland) Ltd	Eilean Siar	276959

The irresponsible use of toxic chemicals by Mowi – including at ‘organic’ and ASC-certified sites - has previously been investigated via:

[Mowi's Pure Bullshit \(#1 in a regular series\): "hardly any chemical treatments at all"](#)

[Toxic Scottish Salmon - Chemical Use Doubles Since 2018!](#)

[Open letter to the ASC: Please cancel all certification of Mowi's toxic Scottish salmon!](#)

[Mowi's 'Host' With the Most....Toxic Chemicals & Antibiotics \(certified as "responsibly farmed" by the ASC\)!](#)



Here's the highest reported monthly uses of Deltamethrin since January 2018 (data up to September 2021) – which includes Mowi’s ‘organic’ salmon farm at Portnalong in Loch Harport:

Date	Site Name	Submitted By	Deltamethrin (g)
01-Mar-19	Port na Moine Site 2 (North)	Mowi Scotland Ltd	480
01-Aug-20	Colonsay	Mowi Scotland Ltd	390
01-Aug-20	Am Maol, Isle of Muck	Mowi Scotland Ltd	305
01-Sep-18	Isle of Rum	Marine Harvest (Scotland)	255
01-Aug-21	Erisort, North Shore West	Mowi Scotland Ltd	255
01-Aug-21	Isle of Rum	Mowi Scotland Ltd	255
01-Jul-21	Isle of Rum	Mowi Scotland Ltd	255
01-Aug-21	Am Maol, Isle of Muck	Mowi Scotland Ltd	240
01-Aug-19	Colonsay	Mowi Scotland Ltd	240
01-Jul-20	Colonsay	Mowi Scotland Ltd	225
01-Jul-21	MacLeans Nose	Mowi Scotland Ltd	200
01-Oct-18	Isle of Rum	Marine Harvest (Scotland)	195
01-Aug-20	Grey Horse Channel	Mowi Scotland Ltd	195
01-Aug-21	Grey Horse Channel Outer	Mowi Scotland Ltd	192
01-Sep-21	Duich	Mowi Scotland Ltd	180
01-Aug-21	Hellisay	Mowi Scotland Ltd	180
01-Jul-21	Duich	Mowi Scotland Ltd	180
01-Jul-19	Isle of Rum	Mowi Scotland Ltd	180
01-Aug-21	Duich	Mowi Scotland Ltd	168
01-Sep-20	Portnalong	Mowi Scotland Ltd	160
01-Jul-21	Colonsay	Mowi Scotland Ltd	152.78
01-Aug-21	Tabhaigh	Mowi Scotland Ltd	150
01-Aug-19	Isle of Rum	Mowi Scotland Ltd	150
01-May-19	Port na Moine Site 2 (North)	Mowi Scotland Ltd	150

Mowi's 'organic' salmon farm in Loch Ewe – [certified by the Soil Association](#) – used the [lobster-killing chemical Deltamethrin in August 2020](#) following an [outbreak of Anaemia, Amoebic Gill Disease and severe Proliferative Gill Disease](#):

Scotland's aquaculture
part of
Scotland's environment

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Fish Farms Monthly Biomass and Treatment Reports

Fish Farm Monthly Biomass and Treatments Details		Location Details	
Year	2020	Receiving Water	Loch Ewe
Month	August	National Grid Reference	NG83748857
Submitted By	Mowi Scotland Ltd	View on Map	View on map
Licence Number	CAR/L/1002963/V10	Data supplied by SEPA on 04/12/2020	
Licence active at time of report	CAR/L/1002963		
Report for Site	IOEWE2 Isle of Ewe		
Max licensed biomass on site (tonnes)	770		
Actual biomass on site (tonnes)	577		
Biomass Exceedance (tonnes)	0		
Feed (kg)	132106		
Mortalities (kg)	5457.0233672910		
Seallice Treatments Used			
Seallice Treatment Product	Quantity Used (grams)		
Azamethiphos	0		
Cypermethrin	0		
Deltamethrin	87.50		
Emamectin Benzoate	0		
Teflubenzuron	0		
Data supplied by SEPA on 04/12/2020			

When Scottish Salmon Watch [visited Mowi's Loch Ewe salmon farm in November 2018](#) we uncovered mass mortalities and disease-ridden skinless salmon:



The head of Mowi’s environment team [claimed in July 2021](#) that “no chemicals are used in raising the fish, and ‘medication’ is kept to a minimum” at their ‘organic’ salmon farm in Loch Harport. However, information [published via ‘Scotland’s Aquaculture’](#) reveals that the toxic chemicals Salmosan (Azamethiphos) and Alphamax (Deltamethrin) – both [shown by peer-reviewed science to be lethal to shellfish](#) – were used at Mowi’s ‘organic’ salmon farm at Loch Harport in November 2021 with an ‘Advisory Letter’ sent by the Scottish Government in December 2021 warning Mowi of repeated breaches of lice limits. Mowi’s ‘organic’ salmon farms at Sconser and Invasion Bay have also been guilty of breaching lice limits with so-called ‘cleaner fish’ used at Mowi’s organic salmon farms in Loch Harport and at Invasion Bay in Loch Sunart:

SITE_NAME	BUSINESS_NAME	Date	Average	Action	MITIGATION	ADDITIONAL_INFORMATION
Loch Harport	Mowi Scotland Ltd	22/11/2021	6.55		Bath	Salmosan
Loch Harport	Mowi Scotland Ltd	15/11/2021	6.06		Bath	Salmosan & Alphamax treatment ongoing
Loch Harport	Mowi Scotland Ltd	08/11/2021	4.3		Bath	Salmosan and Alphamax treatment
Invasion Bay	Mowi Scotland Ltd	24/01/2022	3.85			Redeployment of Cleaner fish/ Harvesting
Loch Harport	Mowi Scotland Ltd	29/11/2021	3.8		Bath	Salmosan treatment was scheduled but delayed until wk 40
Invasion Bay	Mowi Scotland Ltd	17/01/2022	3.62		Cleanerfish	
Invasion Bay	Mowi Scotland Ltd	03/01/2022	3.4		Cleanerfish	
Loch Harport	Mowi Scotland Ltd	11/10/2021	3.38		Cleanerfish	
Loch Harport	Mowi Scotland Ltd	04/10/2021	3.2		Cleanerfish	
Invasion Bay	Mowi Scotland Ltd	10/01/2022	2.98		Cleanerfish	
Loch Harport	Mowi Scotland Ltd	19/07/2021	2.88		Bath	Freshwater treatment.
Loch Harport	Mowi Scotland Ltd	29/03/2021	2.8		Bath	On going extended FW, should be finishing this weekend
Loch Harport	Mowi Scotland Ltd	18/10/2021	2.37		Cleanerfish	
Loch Harport	Mowi Scotland Ltd	12/07/2021	2.36		Harvesting	Freshwater treatment planned
Loch Harport	Mowi Scotland Ltd	01/11/2021	2.125			
Sconser	Mowi Scotland Ltd	31/05/2021	2.03		Bath	Freshwater extended treatment.
Loch Harport	Mowi Scotland Ltd	28/06/2021	2.01		Bath	Freshwater extended treatment
Invasion Bay	Mowi Scotland Ltd	27/12/2021	1.98			
Loch Harport	Mowi Scotland Ltd	13/12/2021	1.93			
Loch Harport	Mowi Scotland Ltd	06/12/2021	1.85	Advisory Letter		
Sconser	Mowi Scotland Ltd	19/07/2021	1.83			
Loch Harport	Mowi Scotland Ltd	27/09/2021	1.82			
Loch Harport	Mowi Scotland Ltd	05/07/2021	1.82			
Loch Harport	Mowi Scotland Ltd	27/12/2021	1.8			
Loch Harport	Mowi Scotland Ltd	10/05/2021	1.77			

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



The welfare nightmare of using cleaner fish (wrasse caught in the wild and farmed; and farmed lumpfish) was [raised earlier this month \(1 February 2022\) by Scamon Scotland](#) – including 4,971 dead cleaner fish at Mowi’s ‘organic’ salmon farm at Invasion Bay in Loch Sunart:

Cleaner fish 'Case Information' published by the Fish Health Inspectorate in 2021

Date	Company	Site	Species	# on site	Mort #s	% Mortality	% stocking	Details recorded by FHI 'Case Information'
Oct	Scottish Sea Farms	Toyness	Wrasse	5,953	5,765	47	6	First cycle of stocking wild caught wrasse (12,187 input in Sept 2021)
Oct	Mowi	North Shore	Both	149,728	117,414	49	46	234,028 lumpfish from Ocean Matters in Wales & 63,668 wild wrasse
Oct	Mowi	Tabhaigh	Both	67,650			12	Farmed lumpfish and wild caught wrasse on site
Oct	The Scottish Salmon Co	Druimyeon Bay	Lumpfish	50,000			14	Lumpfish on site from Ocean Matters
Oct	The Scottish Salmon Co	Portree	Lumpfish	90,980		12.4		Lumpfish (Ocean Matters) morts "attributed to general background losses"
Oct	The Scottish Salmon Co	East Tarbert Bay	Lumpfish	70,000			17	Lumpfish from Ocean Matters & Otter Ferry
Oct	Scottish Sea Farms	Westerbister						"Site to stock wrasse (local wild caught from Orkney) to help combat rising sea lice levels"
Sept	Mowi	Caolas a Deas	Both	90,720	53,596		100	Morts in lumpfish due to sealice treatment (freshwater) & Tenacibaculum
Sept	Scottish Sea Farms	Scallastle Bay	Wrasse	16,705			3	Ballan wrasse caught from the wild; hoping to get lumpfish
Aug	Mowi	Invasion Bay	Both	135,046	4,971		24	Lumpfish morts due to "emancipation", Pseudomonas, wounds & fin damage
May	Mowi	Harport	Both	34,463			13	Farmed & wild Ballan wrasse, wild Corkwing wrasse & lumpfish; "Cages stocked with wild wrasse reported to have had fewer sea lice interventions"

'Case Information' [published by the Scottish Government's Fish Health Inspectorate for an inspection in August 2021 \(Case 2021-0234, p25-46\)](#) details mortalities in lumpfish of up to 1,613 in a week due to [Pseudomonas \(a bacterial disease\)](#), wounds and fin damage and 'emancipation' (which by strict definition means "the freeing of someone from slavery") at Mowi's ‘organic’ salmon farm at Invasion Bay in Loch Sunart ([a site also certified as "farmed responsibly" by the ASC](#)):

Case No: **2021-0234** Date of visit: **04/08/2021**

Time spent on site: **4.5h** Main Inspector: **[REDACTED]**

Site No: **FS0212** Site Name: **Invasion Bay**

Business No: **FB0119** Business Name: **Mowi Scotland Ltd**

Case Types: 1 **ECl** 2 **CNI** 3 **VMD** 4 **SLI** 5 **DIA** 6 **[REDACTED]**

Water Temp (°C): **13.9** Thermometer No: **T173** FHI 045 completed

Observations: Region: **HI** Water type: **S** CoGP MA: **M-34**

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

Clinical signs of disease observed? If yes, see additional information/clinical score sheet.

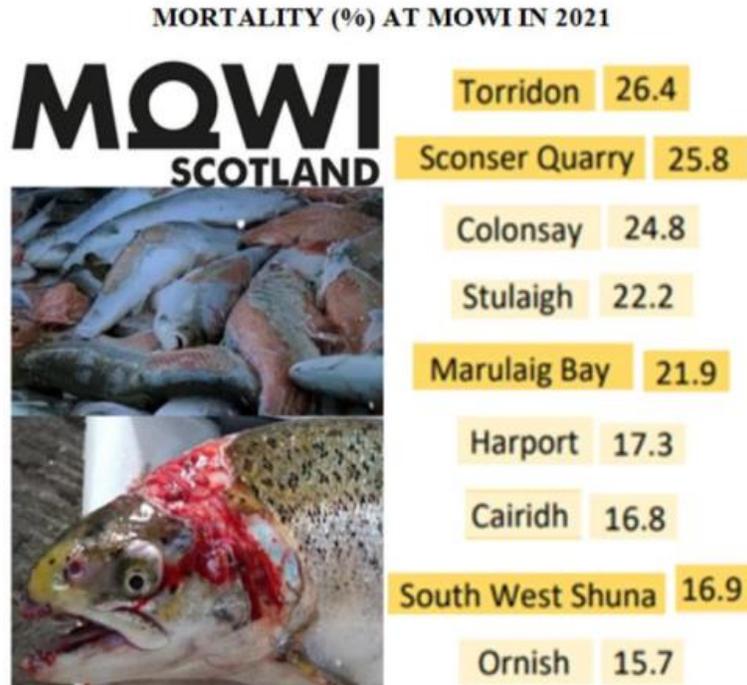
Gross pathology observed? If yes, see additional information/clinical score sheet.

Diagnostic samples taken?

Cleanerfish:
Lumpfish peak mortality- 2020 Wk28, 1613 ,pseudomonas; 2021 Wk18 1217, wounds and fin damage; 2021 Wk24 1004 emancipation; 2021 Wk25 1137, pseudomonas

Site Details (include cleaner fish for all sections)			
Total No facilities	18		Facilities stocked
Species	SAL	LUM	WRS
Age group	2020 Q4	2020	wild
No Fish	564,274	104,058	30,988
Mean Fish Wt	1.743kg	100g	mix

Another metric of ‘responsibility’ - or more aptly of ‘irresponsibility’ - is the mortality rate on salmon farms. Scottish Salmon Watch [reported in December 2021](#) that Mowi’s Loch Harport salmon farm – certified by the Soil Association as ‘organic’ – had a mortality rate of 17.3% (that’s one in six ‘organic’ salmon dying) which was higher than other non-organic sites:



Mortality data for Mowi’s ‘organic’ salmon farm at Invasion Bay in Loch Sunart is not published yet as the site is not yet harvested out (or the data has still not been published). However, mortality data [published by the Scottish Government’s Fish Health Inspectorate](#) reports mass mortalities at Mowi’s ‘organic’ salmon farms in Loch Harport, Loch Ewe and at Sconser with Cardiomyopathy Syndrome, Anaemia, Proliferative Gill Disease and Amoebic Gill Disease:

Mort Event #	Business Name	Site Name	Date reported	Mortality %	Explained reasons	Total mortality during event	Additional information
MRT02301	Mowi Scotland	Loch Harport	20/08/2021	3.51	CMS and Jellyfish Bloom	1861	Site is now fallow
MRT02262	Mowi Scotland	Loch Harport	09/08/2021	4.18	Micro jellyfish bloom	5564	
MRT02265	Mowi Scotland	Loch Harport	09/08/2021	5.05	Jellyfish Bloom (updated 17/8/21 AZM)	5377	4 cages remain stocked. Expected to be harvested out by 14th Aug. 2021
MRT02179	Mowi Scotland	Sconser	21/06/2021	1.12	CMS	2150	CMS related to extended FW treatment
MRT01910	Mowi Scotland	Isle Ewe	18/10/2020	1.86	AGD, Anaemia, and severe PGD	2256	Morts were high end of week and post AMX treatment

Consumers would be forgiven for thinking that ‘organic’ salmon reached their plates free of diseases, toxic chemicals and the use of antibiotics. However, even antibiotics have been used at ‘organic’ salmon farms in Scotland – here’s data on antibiotic use disclosed by SEPA via Freedom of Information earlier this month (2 February 2022):

Year	Operator	Site Name	Florocol (grams)	Aquatet (grams)
2019	Mowi Scotland Ltd	Invasion Bay		17138.64
2020	Mowi Scotland Ltd	Invasion Bay		12861
2019	Mowi Scotland Ltd	Isle of Ewe	420	
2018	Marine Harvest (Scotland) Ltd	Isle of Ewe	13.5	
2017	Marine Harvest (Scotland) Ltd	MacLeans Nose	9000	20000
2019	Mowi Scotland Ltd	MacLeans Nose	2580	79126
2021	Mowi Scotland Ltd	MacLeans Nose		1836000
2019	Mowi Scotland Ltd	Portnalong	1920	
2020	Mowi Scotland Ltd	Sconser Quarry	431	
2021	Mowi Scotland Ltd	Sconser Quarry		105000
2019	Mowi Scotland Ltd	Sconser, Balmeanach Bay	1166	
2018	Marine Harvest (Scotland) Ltd	Sconser, Balmeanach Bay	1.259	

The use of antibiotics by Mowi at Soil Association certified ‘organic’ salmon farms at Invasion Bay in Loch Sunart, in Loch Ewe, Loch Harport (Portnalong) and Balmeanach Bay at Sconser is the antithesis of responsibility – especially in the context of [antibiotics resistance](#) and chemical contamination of the sea-bed under salmon farms. How can the use of Florfenicol (Florocol) and Oxytetracycline (Aquatet) be branded in any way as “responsible” via ‘organic’ certification?

Yet the Soil Association’s salmon standards permit the use of antibiotics. Data [published in December 2021](#) reveals that antibiotic use on salmon farms in Scotland increased 14-fold between 2015 and 2019 and then doubled in 2020 (data for 2021 shows even further increases)!

Antibiotic Use on Marine Salmon Farms in Scotland (2015 to 2019)

Year	Aquatet (g)	Florocol (g)	Total	Kg	Tonnes
2019	188494.642	1895841	2084335.642	2084	2.1
2018	513288.61	762596.681	1275885.291	1276	1.3
2017	206800	551192	757992	757	0.8
2016	72000	74568	146568	147	0.1
2015	12500	131600	144100	144	0.1
Total	993083.252	3415797.681	4408880.933	4408	4.4

Scamon Scotland takes issue with [Ocado's marketing claim](#) that: "MOWI organic salmon (and their feed) is fully traceable plus independent and regularly audited to ensure a responsible use of the environment". The Scottish Environment Protection Agency (SEPA) - the one truly independent agency responsible for auditing environmental impacts – has not regularly or recently conducted any environmental monitoring surveys or concluded in any shape or form that Mowi is responsible.

The Ferret and Sunday National [reported earlier this month](#) (6 February 2022) that SEPA has not been able to perform their environmental functions for years due to a cyber attack. Scamon Scotland understands that SEPA no longer conducts environmental monitoring surveys or audits of salmon farms. More background is detailed via:

[Fish Farm Pollution Rules Relaxed for Brexit](#)

[Environmental rules for salmon farming industry relaxed](#)

[Under the Cloak of Coronavirus: SEPA open the floodgates to lobster-killing chemicals!](#)

In fact, there is no [published data on environmental monitoring survey of any salmon farm in Scotland since March 2020](#). The last environmental monitoring survey of Mowi's 'organic' salmon farm at Invasion Bay in Loch Sunart (the current supplier of 'organic' salmon for Sainsbury's and presumably Ocado) was in 2018 and it was [classified as "Unsatisfactory"](#) (i.e. it failed). Other environmental surveys in [2016](#), [2014](#) and [2006](#) reported "Unsatisfactory" results:

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Water Type: --All-- Species: --All--

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Survey Date	Survey Type	Monitoring Method	SEPA Classification	Licence Site ID	Licence Site Name	Local Authority	Licence Holder	Actions
					invasion bay			
28/02/2018	Self Monitoring	Benthic	Unsatisfactory	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More
10/02/2016	Self Monitoring	Benthic	Unsatisfactory	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More
15/05/2014	Self Monitoring	Benthic	Unsatisfactory	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More
19/06/2012	Self Monitoring	Benthic	Not Accepted	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More
13/07/2010	Self Monitoring	Benthic	Satisfactory	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More
02/04/2008	Self Monitoring	Benthic	Satisfactory	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More
31/05/2006	Self Monitoring	Benthic	Unsatisfactory	INV1	Invasion Bay	Highland	Mowi Scotland Ltd	More

Go back even further and BBC presenter John Humphrys recounts an “absolutely horrifying” dive under a salmon farm in Loch Sunart in his [2002 book ‘The Great Food Gamble’](#).

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News

BBC's Humphrys 'swam under salmon cage'

By [Jenny Hjul](#) - 14th August 2019



Scuba diver: Today show host John Humphrys

BBC Today show host John Humphrys has revealed that he once swam beneath a salmon cage to inspect fish waste.

During an interview with Mowi Scotland director of communications Ian Roberts this morning, the veteran broadcaster made clear his opposition to salmon farming.

Quizzing Roberts about Mowi's proposal to build a 'huge' farm off the coast of Canna in the Inner Hebrides, Humphrys said: 'The amount of filth they deposit on the sea floor, on the loch floor or wherever they happen to be, is enormous isn't it?'

'I've seen it myself, I've swum beneath salmon cages and it is absolutely horrifying...that's my own word, other people might quarrel with it but, nonetheless, I was absolutely appalled by the depth and the extent of the filth on the floor.'

Humphrys said he had been scuba diving beneath a farm, but gave no further details.

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You don't need to be a Mastermind to understand that a farming system which discharges untreated waste effluents directly into the sea can cause environmental pollution. Here's [video footage of the “filth on the floor” from under a salmon farm operated by Mowi \(broadcast by BBC Panorama in May 2019\)](#):



SEPA has not published ‘emissions’ data on the waste effluents discharged by salmon farms for 2020 or 2021 (it may be [available on the Dark Web via the cyber-hackers behind the ransom attempt on SEPA in 2020](#)). However, [data on annual emissions of copper, zinc, nitrogen, phosphorus and carbon is available for 2019](#) – here’s the [waste discharges for Mowi’s ‘organic’ salmon farm at Invasion Bay in Loch Sunart](#):

Fish Farms Annual Emissions

Annual Emissions Details		Location Details	
Licence Site Name	Invasion Bay	Receiving Water	Loch Sunart
Year	2019	National Grid Reference	NM73316102
Submitted By	Mowi Scotland Ltd	View on Map	View on map
Licence active at time of report		Data supplied by SEPA on 04/12/2020	
Total copper from feed and nets (kg)	14.8995346163		
Zinc from feed (kg)	311.7946729270		
Nitrogen (kg)	110431.84480338		
Phosphorus (kg)	15250.1119014192		
Total organic carbon (kg)	354302.1687441780		
Data supplied by SEPA on 04/12/2020			

And here are the [waste discharges for Mowi’s ‘organic’ salmon at Sconser on the Isle of Skye in 2019](#):

Fish Farms Annual Emissions

Annual Emissions Details		Location Details	
Licence Site Name	Sconser, Balmeanach Bay	Receiving Water	Sound of Raasay
Year	2019	National Grid Reference	NG53453415
Submitted By	Mowi Scotland Ltd	View on Map	View on map
Licence active at time of report		Data supplied by SEPA on 04/12/2020	
Total copper from feed and nets (kg)	10.9789351979		
Zinc from feed (kg)	229.7503645098		
Nitrogen (kg)	81373.2844082454		
Phosphorus (kg)	11237.2630849482		
Total organic carbon (kg)	261072.6208097870		
Data supplied by SEPA on 04/12/2020			

In layman terms, salmon farms discharge untreated waste effluents (including toxic chemicals and antibiotics) directly into the sea with zero sewage treatment. To put the pollution into perspective, [The Herald reported in 2018](#):

The Herald

NEWS

15th March 2018

One fish farm produces waste equivalent to 'all of Scotland's west coast towns'



By Alistair Grant | [@alistairgrant](#)
Political Correspondent

ONE fish farm produces the same amount of waste as all of Scotland's west coast towns put together, an expert has said.

Dr Richard Luxmoore, senior nature conservation adviser at the National Trust for Scotland, said a moderately-sized farm dumped the same amount of sewage as a town twice the size of Oban.

It comes as a string of experts warned salmon farming was having a deadly impact on the environment.

Dr Luxmoore said fish farms were pumping “huge quantities” of organic waste into the sea, making up around 80 per cent of all sewage.

He told a **Holyrood** committee: “A single fish farm, which currently has a maximum size at the moment of 2,500 tonnes, produces the sewage equivalent of a town twice the size of Oban.

“So if you added up all of the towns on the west coast, virtually, they are producing the same amount of sewage as one fish farm – a moderately large fish farm.

“Now of course, you're not allowed to discharge waste from a single septic tank into the sea without it being treated.

“And if you were to suggest building two Obans somewhere in the Sound of Mull, saying, ‘Is it alright if we just chuck the sewage straight in the sea?’, you would get very short shrift over it.

Given the untreated plumes of waste effluents spewing from salmon farms across Scotland it is not surprising that they cause environmental pollution under the cages. If you look at the

environmental monitoring survey data [published by SEPA](#) for Mowi’s ‘organic’ salmon at Sconser (Balmeanach Bay) you can see that the Soil Association certified site was classified as “Unsatisfactory” in [2017](#), [2015](#), [2014](#), [2010](#), [2008](#) and [2006](#):

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Water Type: --All-- Species: --All--

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Survey Date	Survey Type	Monitoring Method	SEPA Classification	Licence Site ID	Licence Site Name	Local Authority	Licence Holder	Actions
20/07/2019	Self Monitoring	Benthic	Satisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
12/05/2017	Self Monitoring	Benthic	Unsatisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
04/11/2015	Self Monitoring	Benthic	Unsatisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
05/06/2014	Self Monitoring	Benthic	Unsatisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
04/04/2012	Self Monitoring	Benthic	Satisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
21/07/2010	Application - existing site	Visual - Video	Satisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
24/02/2010	Self Monitoring	Benthic	Unsatisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
08/04/2008	Self Monitoring	Benthic	Unsatisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More
27/04/2006	Self Monitoring	Benthic	Unsatisfactory	BALM1	Sconser, Balmeanach Bay	Highland	Mowi Scotland Ltd	More

If you dare to take a peek at the environmental monitoring surveys [published by SEPA](#) for Mowi’s ‘organic’ salmon farm in Loch Ewe there’s a similar picture of irresponsible benthic pollution of the marine environment with “Unsatisfactory” surveys 2018, 2017, 2015, 2013, 2011, 2009 and 2006. Benthic pollution was behind the closure of Mowi’s Loch Ewe salmon farm [according to Salmon & Trout Conservation](#).

MONITORING subform for PRE-INSPECTION FORM - master

Survey Date	Classification	Type	Biomass
05/12/2018	Unsatisfactory	Benthic	59
15/01/2017	Unsatisfactory	Benthic	306
16/04/2015	Unsatisfactory	Benthic	1235
20/05/2013	Unsatisfactory	Benthic	789
12/04/2011	Unsatisfactory	Benthic	1135
14/07/2009	Unsatisfactory	Audit	1356
21/05/2009	Unsatisfactory	Benthic	1150
13/04/2007	Unclassified	Benthic	1667
13/09/2006	Unsatisfactory	Benthic	700
06/06/2005	Borderline	Benthic	1076

Here's the "Unsatisfactory" nature of 'organic' salmon farming in black and white [via 'Scotland's Aquaculture'](#):

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Water Type: --All-- Species: --All--

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Survey Date	Survey Type	Monitoring Method	SEPA Classification	Licence Site ID	Licence Site Name	Local Authority	Licence Holder	Actions
					ewe			
08/04/2020	Self Monitoring	Benthic	To be evaluated	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
05/12/2018	Self Monitoring	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
15/01/2017	Self Monitoring	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
16/04/2015	Self Monitoring	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
20/05/2013	Self Monitoring	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
12/04/2011	Self Monitoring	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
14/07/2009	SEPA Audit	Audit	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
21/05/2009	Self Monitoring	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
13/04/2007	Self Monitoring	Benthic	Unclassified	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More
13/09/2006	SEPA Audit	Benthic	Unsatisfactory	IOEWE2	Isle of Ewe	Highland	Mowi Scotland Ltd	More

Mowi's 'organic' salmon farm at Portnalong in Loch Harport (Loch Bracadale) was [classified by SEPA as "Unsatisfactory" in 2019, 2010 and 2001](#) – how irresponsible of this Soil Association certified site:

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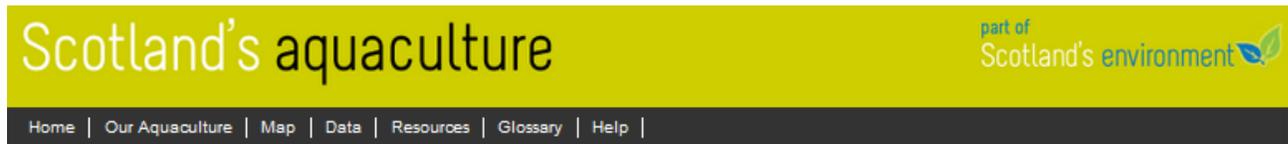
Water Type: --All-- Species: --All--

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Show/Hide Advanced Filters

Survey Date	Survey Type	Monitoring Method	SEPA Classification	Licence Site ID	Licence Site Name	Local Authority	Licence Holder	Actions
					portnalong			
02/09/2019	Self Monitoring	Benthic	Unsatisfactory	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More
30/08/2016	Self Monitoring	Benthic	Satisfactory	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More
11/06/2015	Self Monitoring	Benthic	Satisfactory	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More
06/02/2014	Self Monitoring	Benthic	Not Accepted	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More
23/01/2012	Self Monitoring	Benthic	Satisfactory	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More
02/03/2010	Self Monitoring	Visual - Video	Baseline	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More
02/02/2010	Self Monitoring	Benthic	Unsatisfactory	PORL1	Portnalong	Highland	Mowi Scotland Ltd	More

Moreover, SEPA has not [published data on environmental surveys for chemical residues under salmon farms since July 2020](#) (presumably because SEPA no longer conducts environmental monitoring of salmon farms). When SEPA did conduct environmental monitoring of chemical contamination under salmon farms, Mowi's 'organic' salmon farm at Callert in Loch Leven breached the Environmental Quality Standard for the [crustacean-killing chemical Emamectin benzoate](#) in a [survey published in 2011](#) and in other surveys [published in 2003](#) and [2002](#):



Sealice In-Feed Treatment Residues

Sealice In-Feed Treatment Residues Details					
Site Name	Callert (Leven)				
Submitted By	Marine Harvest (Scotland) Ltd				
Licence active at time of report	CAR/L/1009962				
Treatment Name	Slice				
Active Ingredient	Emamectin Benzoate				
End of Treatment Date	28/03/2011				
Sample Date	28/06/2011				
Days between End of Treatment and Sample Date	92				
	Residues Results Micrograms per Kilogram			Environmental Quality Standard Micrograms per Kilogram	
Replicate	1	2	3	Emamectin Benzoate	Teflubenzuron
Cages	6.21	10.82	4.51	7.63	10000
25m				7.63	10000
100m	ND	ND	ND	0.763	2
150m				0.763	2
Data supplied by SEPA on 04/12/2020					

Location Details	
Receiving Water	Loch Leven
National Grid Reference	NN07995950
View on Map	View on map
Data supplied by SEPA on 04/12/2020	

Mowi's 'organic' salmon farm at Portnalong in Loch Harport (Loch Bracadale) breached the Environmental Quality Standard for the [crustacean-killing chemical Emamectin benzoate](#) in surveys [published by SEPA in 2015](#), [2010](#), [2008](#), [2006](#), [2003](#) and [2002](#).

Mowi's 'organic' salmon farm at Invasion Bay in Loch Sunart breached the Environmental Quality Standard for the [crustacean-killing chemical Emamectin benzoate](#) in surveys [published by SEPA in 2018](#), [2016](#), [2014](#) and [2010](#).

Mowi's 'organic' salmon farm at Sconser in Balmeanach Bay breached the Environmental Quality Standard for the [crustacean-killing chemical Emamectin benzoate](#) in a survey [published by SEPA in 2019](#).

Scamon Scotland maintains that there is no substantive difference between ‘organic’ salmon and conventionally farmed salmon. Scamon Scotland believes that [so-called 'organic scamon'](#) is a scam, sham and a consumer con.

The vast majority of Scottish salmon products are marketed and advertised as “responsibly sourced” and “responsibly farmed” with the ASC’s “farmed responsibly” logo stamped on both conventional and ‘organic’ products. This is shameless greenwashing of toxic Scottish salmon via the Soil Association, ASC and RSPCA Assured.



Scamon Scotland recommends that the Soil Association withdraw from certifying salmon farms as ‘organic’ and that the ASC changes their marketing logo to better reflect the reality of irresponsible salmon farming.



Back in 2006, award-winning food writer Joanna Blythman [wrote in The Observer](#):

The Observer
Food

Why organic salmon is causing a nasty smell

What's the difference between organic farmed salmon and the much-demonised variety that's kept in cages, stuffed with colours and pesticides, doomed to swim in its own faeces and prematurely slaughtered? Surprisingly little, discovers Joanna Blythman

But here's the nub of the problem with organic salmon: it doesn't deliver the radical difference in production methods that consumers have come to expect from other categories of organic food. To make a very unsubtle joke, there just isn't enough clear blue water between conventional salmon farming - condemned by its critics as the biggest environmental disaster to afflict the west coast of Scotland in living memory - and the organic alternative. Indeed, delve into the supposed differences between the two and the water looks rather murky; so murky, in fact, that even some long-standing advocates of organic farming won't have any truck with it. As Iain Tolhurst, a highly respected organic grower and a key figure in the foundation of the modern British organic movement puts it: 'If the public was given the full facts about organic salmon, they would demand something better. So-called "organic" salmon is making a mockery of organic standards.'

BBC News [reported in 2006](#):

BBC NEWS LIVE **BBC NEWS CHANNEL**

Last Updated: Thursday, 5 October 2006, 13:06 GMT 14:06 UK

[E-mail this to a friend](#) [Printable version](#)

Concern over organic salmon farms

The licensing of salmon farms by the Soil Association has led to some within the UK's organic movement to voice concerns that standards are slipping.

A confidential study for the UK's top organic body highlighted gaps between its principles and the standards it accepted, BBC Newsnight reported.



The study highlights the possibility some fish could escape

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'Very regrettable'

But purists argued that the only kind of organic fish were wild ones. Lawrence Woodward, former chairman of the Soil Association's standards committee, believed the decision to license the farms was a mistake.

"Salmon farming in cages has nothing at all to do with organic principles," he said.

"It is very regrettable that the Soil Association has gone down this line of trying to certify

something that is so distant from the principles."

Back in 2018, Salmon & Trout Conservation [lambasted the con of 'organic' salmon](#):



Salmon & Trout
Conservation
Scotland

DEFENDING OUR WILD WATERS - EST 1903



"Organic" farmed salmon – let's get real

"Organic" farmed salmon

Similar scenarios play out at dinner tables up and down the UK, particularly during the festive season.

Salmon, either smoked or "fresh", is served and the host, feigning environmental awareness, announces along the lines of:

"Don't worry, we are always very responsible – we only ever buy 'organic' salmon."

But is eating "organic" farmed salmon really environmentally responsible?

The blunt and unequivocal answer is, no!

"Organic" salmon is a con. It is simply a marketing ploy, aimed at the naive and ignorant well-heeled, especially those who frequent the more prestigious supermarkets and food emporiums, to persuade them to pay a premium price for something that is almost the same as bog standard farmed salmon.

The only real difference is that "organic" salmon is stocked in open net cages at a lower density. There is no separation between the farmed fish and the wider environment; fish faeces, in vast quantities, still pollutes and destroys the integrity of the seabed.

"Organic" salmon farmers still use all the same chemicals, including lice treatments, thus killing other crustaceans in the vicinity.

The [problems with lice](#) and escapes are just as prevalent in "organic" salmon - hence the impacts on wild fish are identical.

The Soil Association's indefensible endorsement of any farmed salmon undermines the credibility of, and indeed is an indelible stain on, the organisation's reputation.

So, the next time you hear a smug announcement from your host that the salmon being served is so-called "organic" and therefore by implication "is ok to eat", I suggest giving it a wide berth.

At the same time, you should tactfully explain that he or she is being duped and, if they give a damn about the environmental damage all salmon farming, including that purporting to be "organic", causes (especially to wild salmon and sea trout in the west Highlands and Islands), they should not allow such dross of sham pedigree to besmirch and contaminate their table.

Yet [the Soil Association has corroded their principles](#) to welcome the toxic salmon farming industry into the 'organic' movement. The latest version of the Soil Association's 'organic' salmon standards ([published in February 2021](#)) shamefully permits the use of the [lobster-killing chemical Deltamethrin](#):



Don Staniford
@TheGAAIA

Toxic 'Organic' Scamon - Why does @SoilAssociation allow 'organic' salmon farmers to use the toxic chemical Deltamethrin (shown by peer-reviewed science published in 2020 to be lethal to lobsters)? @SoilAssocScot @HelenBOrganic @jamescashmore @JoLewisSA tinyurl.com/4vs7xsd6

8:57 AM · Mar 20, 2021

Suffice to say that complaints against ‘organic’ Scottish salmon will only increase as the industry – especially [Norwegian behemoth Mowi](#) – target increased production of ‘organic’ salmon in a desperate attempt to greenwash their toxic business. Scottish Salmon Watch [reported in October 2021](#) how ‘organic’ salmon farming had trebled in a year as the Soil Association rakes in the Salmoney!

 **Don Staniford**
@TheGAAIA 

The scam that is 'organic' Scottish salmon - aka 'Organic Scamon' - has almost trebled in a year: increasing from 4,462 tonnes of 'organic' salmon reported in 2019 to 12,528 tonnes in 2020. That's a leap of 181% in a single year! tinyurl.com/cw6kbz6r @SoilAssociation

Organic Production
Table 39: Organic production of Atlantic salmon during 2011-2020

Year	Number of active cage sites	Number of cage sites certified as organic	Production (tonnes)
2011	252	10	3,104
2012	255	7	4,597
2013	253	8	5,207
2014	257	8	3,588
2015	250	5	2,382
2016	248	5	3,903
2017	222	5	4,644
2018	217	5	4,219
2019	224	4	4,462
2020	231	9	12,528

Of the 231 active Atlantic salmon seawater cage sites in 2020, nine were certified as organic, producing 12,528 tonnes.

10:11 AM · Oct 8, 2021 

Scamon Scotland therefore seeks a ruling against Ocado and Sainsbury’s marketing of ‘organic’ Scottish salmon – sourced from Mowi – as “responsibly sourced”, “farmed responsibly”, “responsible use of the environment” and “raised responsibly”.

As context, Scottish Salmon Watch (rebranded Scamon Scotland on 1 February 2022) filed complaints against supermarkets including Sainsbury’s for breach of [The Consumer Protection from Unfair Trading Regulations 2008](#) with respect to [Regulation 5 \(Misleading Actions\)](#) and [Regulation 6 \(Misleading Omissions\)](#) in terms of marketing and advertising Scottish salmon as “responsibly farmed” and “responsibly sourced”. Key documents detailing hard evidence to back up the complaints are online via:

[Trading Standards & CMA Letter of Complaint Vs Supermarkets](#) (19 November 2021)

[Hard Evidence Vs 'Responsibly Farmed' & 'Responsibly Sourced' Scottish Salmon](#) (submitted to Trading Standards & the CMA on 19 November 2021)

[Advertising Standards Authority Complaint & Hard Evidence Vs 'Responsibly Farmed' Mowi salmon sold by Tesco & Sainsbury's \(19 November 2021\)](#)

More background is available online via:

[Irresponsibly Farmed Scottish Salmon - Complaints Filed Vs Supermarkets with Advertising & Trading Standards!](#)

[Supermarkets Investigated by Competition and Markets Authority - "Responsibly Farmed/Sourced" Green Claims Questioned!](#)

[Bullshit Called on M&S's "Responsibly Sourced" Scottish Salmon!](#)

[Gotcha: Mowi's "Responsibly Farmed" Scottish Salmon Caught in Advertising Standards Net!](#)



The scam of 'sustainable' and 'responsible' Scottish is showcased further via:

[Greenwashing 'Sustainable' Salmon - how supermarkets brand themselves as "responsible" via ClientEarth!](#)

[Scamon Alert: The Pished Fish Challenged Over "Sustainably Sourced" Scottish Salmon](#)
[Victory: The Pished Fish Sobers Up to False Claims Over "Sustainable" Scottish Salmon!](#)
[Scottish salmon firm drops 'sustainable' branding](#)



**Greenwashing
Scottish Salmon**

Yours sincerely,

Don Staniford

Director, Scamon Scotland

Cc: Advertising Standards Authority:
enquiries@asa.org.uk; davidb@ASA.Org.UK and celiah@asa.org.uk
National Trading Standards: nationaltradingstandards@actso.org.uk
Soil Association
Aquaculture Stewardship Council

Appendix:

Scamon Scotland [submitted an online complaint with Ocado on 3 February 2022:](#)



Submit a request

We aim to get back to you within 24 hours, so if your query is urgent or relates to a delivery due to arrive within the next 24 hours, we recommend that you use our chat function or give us a call for a speedier resolution. You can find our details at ocado.com/customer-care

Your registered email address *

salmonfarmingkills@gmail.com

Reason for contact *

I'd like to make a complaint

Your message *

Before filing a formal complaint with Trading and Advertising Standards, could Ocado please provide specific details to substantiate your claims about Mowi's 'Organic' Smoked Salmon marketed online via:

https://www.ocado.com/products/mowi-organic-smoked-salmon-576903011?ds_rl=1291426&ds_rl=1291531&gclid=Cj0KCQiA9OiPBhCOARIsAI0y71DvcTJ3NJ4jOx97DaUE_aIyAbf1zMjZpdvVrjPvBRSsYFCxGFmytE4aApBrEALw_wcB&gclsrc=aw.ds

Ocado claims under 'Product Information' that Mowi's 'organic' salmon is "independently and regularly audited to ensure a responsible use of the environment".

Scamon Scotland understands that the Scottish Environment Protection Agency no longer conducts environmental monitoring surveys or audits of salmon farms - please read:

<https://theferret.scot/fish-farm-pollution-rules-relaxed-brexite/>

<https://theferret.scot/environmental-rules-salmon-farming-relaxed/>

In fact, there is no published data on environmental monitoring surveys since March 2020:

http://aquaculture.scotland.gov.uk/data/environmental_monitoring_surveys.aspx

And there is no published data on environmental surveys for chemical residues under salmon farms since July 2020:

http://aquaculture.scotland.gov.uk/data/sealice_in_feed_treatment_residues.aspx

If Ocado is referring to RSPCA, ASC or Soil Association audits these are not independent as they are industry schemes which are no more than greenwashing the toxic salmon farming industry:

<https://donstaniford.typepad.com/my-blog/2021/07/rspca-compromised-by-cash-industry-bias.html>

<https://donstaniford.typepad.com/my-blog/2022/01/open-letter-to-the-asc-please-cancel-all-certification-of-toxic-scottish-salmon-.html>

<https://donstaniford.typepad.com/my-blog/2021/03/toxic-salmon-corrodes-soil-association-principles.html>

Ocado's claim that Mowi's organic salmon is "100% Scottish" is undermined by the fact that ca. 90% of 'Scottish' salmon is sourced from ova (eggs) imported from Iceland, Ireland and Norway and the fact that Mowi imports smolts from Ireland to on-grow on 'organic' salmon farms at Sconser and Harport on the Isle of Skye.

The suggestion by Ocado that Mowi's 'organic' Scottish salmon are "raised responsibly" is simply not true and demands clear evidence from Ocado to back up the green claims.

The implication is that Ocado's Mowi 'organic' Scottish salmon is environmentally friendly and sustainable (as detailed in yesterday's Grocer article: <https://www.thegrocer.co.uk/new-product-development/premium-salmon-brand-mowi-launches-organic-lines-on-ocado/664095.article>). However, the claim of sustainability for Scottish salmon is unfounded and was debased by a ruling by the Advertising Standards Authority back in 2019: <https://theferret.scot/loch-duart-sustainable-advertising/>

And just last year in the United States, Mowi settled a class action lawsuit which stopped the marketing of "sustainably sourced" Mowi salmon for 2 years:

<https://donstaniford.typepad.com/my-blog/2021/03/mowi-settles-class-action-lawsuit-for-13-million-.html>

Just last month, online Scottish salmon retailer The Pished Fish deleted their "sustainable" claims following a complaint by Scottish Salmon Watch: <https://donstaniford.typepad.com/my-blog/2022/01/scamon-alert-the-pished-fish-challenged-over-sustainably-sourced-scottish-salmon.html>

In November 2021, Mowi's "responsibly farmed" Scottish salmon (as sold via Tesco and Sainsbury's) was the subject of complaints filed with Trading and Advertising Standards:

<https://donstaniford.typepad.com/my-blog/2021/11/gotcha-mowis-responsibly-farmed-scottish-salmon-caught-in-advertising-standards-net-.html>

<https://donstaniford.typepad.com/my-blog/2021/11/irresponsibly-farmed-scottish-salmon-complaints-filed-vs-supermarkets-with-advertising-trading-stand.html>

Further background is detailed via a blog published this morning via:

"Organic Scamon: Ocado Challenged Over Mowi's 'Organic' Credentials - 100% Bullshit not 100% Scottish!": <https://donstaniford.typepad.com/my-blog/2022/02/organic-scamon-ocado-challenged-over-mowis-organic-credentials-.html>

Please respond within 7 days or Scamon Scotland will file formal complaints with Trading and Advertising Standards.

Thanks,

Don Staniford

Director, Scamon Scotland

From: **Ocado Customer Services** <ocado@ocado.com>
Date: Thu, Feb 3, 2022 at 7:17 PM
Subject: RE: I'd like to make a complaint REF: ##32274402##
To: salmonfarmingkills@gmail.com
Hello,

Thank you for your reply, your email is on its way to our team of advisors. We'll do our best to get back in touch within 24 hours.

Best wishes,

Ocado Customer Service Team

Chat & Help ocado.com/contactus | Tweet @ocado | facebook.com/ocado

From: **Ocado Customer Services** <ocado@ocado.com>
Date: Sat, Feb 5, 2022 at 10:53 AM
Subject: RE: I'd like to make a complaint REF: ##32274402##
To: <salmonfarmingkills@gmail.com>
Good morning Mr Staniford,

I just wanted to let you know I haven't forgotten about this - I'm still waiting for a response from

our team.

If I haven't heard anything by Monday I will chase this up for you.

If there's anything else I can do in the meantime, just let me know.

Kind regards,

Emily Lonsdale
Ocado Customer Service Team

From: **Ocado Customer Services** <ocado@ocado.com>
Date: Mon, Feb 7, 2022 at 11:59 AM
Subject: RE: I'd like to make a complaint REF: ##32274402##
To: <salmonfarmingkills@gmail.com>
Good afternoon Mr Staniford,

I hope this email finds you well.

I have received the following statement from our team:

Hi there. Thank you for getting in touch and making us aware of your concerns. Having investigated together with the supplier, we can confirm that all organic salmon from Mowi is sourced from farms that are fully accredited by the Soil Association. Rest assured, we have very high standards for all our suppliers when it comes to the welfare of animals. If you have any specific queries relating to Mowi products, we'd suggest you contact them directly. Many thanks.

I hope this satisfies your query. If there's anything else I can do for you, please let me know.

Kind regards,

Emily Lonsdale
Ocado Customer Service Team
ocado.com/contactus | 0345 656 1234 | [@ocado](https://twitter.com/ocado) | facebook.com/ocado
Please include reference number ##32274402## in all email correspondence.

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Mon, Feb 7, 2022 at 12:52 PM
Subject: Re: I'd like to make a complaint REF: ##32274402##
To: Ocado Customer Services <ocado@ocado.com>

Thanks for your reply. However, your response fails to address the concerns raised in our complaint last week; as detailed via:
<https://donstaniford.typepad.com/my-blog/2022/02/organic-scamon-ocado-challenged-over-mowis-organic-credentials-.html>

Specifically, Ocado has failed to substantiate the claims on your website that:

"MOWI Organic salmon fillets are 100% Scottish and raised responsibly".

As [detailed in our complaint](#), Mowi 'organic' salmon is imported as smolts from Ireland and is sourced from ova (eggs) which are not Scottish. Neither is Mowi salmon "raised responsibly" ([Scottish Salmon Watch detailed extensive documentation on this issue in complaints to Trading and Advertising Standards in November 2021](#)).

Ocado has failed to provide any evidential information at all on the false claim that Mowi 'organic' salmon is "100% Scottish" and "raised responsibly". To pass the buck onto Mowi - who does not reply to emails - is simply unacceptable. Ocado is the advertiser making green claims and you have patently failed to substantiate them which, Scamon Scotland believes, is a breach of the green claims code.

Furthermore, as detailed in our complaint last week, Scamon Scotland takes issue with Ocado's marketing claim that: "MOWI organic salmon (and their feed) is fully traceable plus independent and regularly audited to ensure a responsible use of the environment".

The Soil Association profits from certification of farmed salmon as 'organic' even if it is lice-infested and it is farmed via the use of toxic chemicals. Nor has the Scottish Environment Protection Agency (SEPA) - the one truly independent agency responsible for auditing environmental impacts - regularly or recently conducted any environmental monitoring surveys or concluded in any shape or form that Mowi is responsible.

In fact, The Ferret and Sunday National reported yesterday that SEPA has not been able to perform their environmental functions for years due to a cyber attack:
<https://theferret.scot/pollution-data-lost-cyber-attack/>

At the end of this week, Scamon Scotland will therefore be filing a formal complaint with Trading and Advertising Standards. If Ocado wishes to reconsider and provide the substantive documentation requested then it would be still much appreciated. If Ocado cannot provide the substantiation requested then editing your website's marketing and advertising claims accordingly would be a corrective step to this complaint.

Thanks,

Don Staniford

Director, Scamon Scotland

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Feb 8, 2022 at 10:22 AM
Subject: Re: I'd like to make a complaint REF: ##32274402##
To: Ocado Customer Services <ocado@ocado.com>

I strongly suggest your 'team' revisit your response and look at the 'Green Claims Code' published by the Competition and Markets Agency in September 2021:
<https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>

The onus is clearly on Ocado - as the online retailer - to correct the misleading claims of Mowi's products.

Details via: [Mowi's "100% Scottish" Salmon Imported from Ireland - 100% 'Organic' Bullshit!](#)

Best fishes,

Don

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Feb 8, 2022 at 1:15 PM
Subject: Misleading marketing claims re. Mowi salmon marketed via Ocado - please correct by the end of this week
To: <mowi.uk@mowi.com>, <media@mowi.com>
Cc: Ocado Customer Services <ocado@ocado.com>, <contact@soilassociation.org>, <norway@mowi.com>, <ivan.vindheim@mowi.com>, <ben.hadfield@mowi.com>

Will Mowi Scotland please substantiate the misleading claims made via Ocado's 'organic' salmon?

As advertised online via:

<https://www.ocado.com/products/mowi-organic-salmon-fillets-576899011>
<https://www.ocado.com/products/mowi-organic-smoked-salmon-slices-576903011>

Mowi's misleading claims are as follows:

- "100% Scottish"
- "raised responsibly"
- "independently and regularly audited to ensure a responsible use of the environment"

Ocado told Scamon Scotland yesterday (7 February 2022): "Having investigated together with the supplier, we can confirm that all organic salmon from Mowi is sourced from farms that are fully accredited by the Soil Association. Rest assured, we have very high standards for all our suppliers when it comes to the welfare of animals. If you have any specific queries relating to Mowi products, we'd suggest you contact them directly."

Please see below for Scamon Scotland's complaint filed with Ocado on 3 February 2022 and other email correspondence. This issue is also highlighted via:

[Mowi's "100% Scottish" Salmon Imported from Ireland - 100% 'Organic' Bullshit!](#)
[Organic Scamon: Ocado Challenged Over Mowi's 'Responsibly' Farmed Salmon - 100% Bullshit not 100% Scottish!](#)

Scamon Scotland points Mowi - and Ocado who are copied into this email - to the 'Green Claims Code' published by the Competition and Markets Authority in September 2021:

<https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>

p6-7 includes:

Whom is this guidance for?

- 2.17 This guidance is for all businesses who make environmental claims.
- 2.18 The claims may be made by manufacturers, wholesalers, distributors and retailers. The claims may be made about goods or services, or particular components or aspects of them. They may also be made about a process or a brand or business as a whole.
- 2.19 The guidance will also be of relevance to organisations who produce codes of practice and to third parties who develop certification schemes.

Business-to-consumer claims

- 2.20 Where claims are ultimately aimed at consumers, this guidance will apply, even if the claims are made by a manufacturer, wholesaler or distributor which does not have direct contact with a consumer.
- 2.21 In some cases, retailers and wholesalers (or manufacturers) could be liable for claims under consumer protection legislation. For example, retailers who sell products featuring misleading environmental claims made by manufacturers or wholesalers on their packaging can be liable for those claims (as well as the manufacturer or wholesaler). Retailers should assure themselves that any such claims are accurate and not misleading.
- 2.22 Online marketplaces also have responsibilities where they allow sellers to market products via their platform. They can be liable in relation to misleading environmental claims where they:
 - do not take adequate steps to ensure that products being sold on their platform comply with the law, for example, by taking steps to prevent misleading claims and removing claims which they know to be misleading;

Since Mowi knowingly imports parr and smolts for on-growing as 'organic' salmon in Scotland from Ireland (as well as depends on ova imports from outside Scotland), it is clear that the "100% Scottish" claim by Ocado and Mowi is misleading. Scamon Scotland politely requests that this claim is removed immediately by Mowi and Ocado. As I blogged this morning:

Here's trade data disclosed by the Scottish Government via FOI-2022-00272899 detailing 300,000 parr (young salmon) imported from Mowi in Ireland to on-growing in [Mowi's controversial Loch Ness salmon farm](#):

Date consignment due	Trade purpose	Destination site name	Destination business name (Site operator)	Species	Stage	Number	Source Country	Import consignor	Import Site of Origin
19/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
19/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
19/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
20/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
20/07/2021	Farming	Loch Ness	Mowi Scotland Ltd	SAL	SMO*	60000	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
16/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
16/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
16/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91400	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
17/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
17/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91300	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit
17/07/2020	Farming	Loch Damph	Torridon Smolts Ltd	SAL	SMO*	91400	Republic_of_Ireland	Mowi_Ireland	Pettigo Freshwater Smolt Unit

* Imports of parr to freshwater site

Scottish Salmon Watch [reported last month that the vast majority of ova used on 'Scottish' salmon farms are imported from Iceland, Ireland and Norway](#) so are not "100% Scottish" as claimed by Ocado.

The [FOI disclosure from the Scottish Government](#) revealed that 582,000 salmon smolts were imported from Ireland in April 2020 to on-grow on [Norwegian-owned Mowi's](#) 'organic' salmon farms in Loch Harport and Sconser on the Isle of Skye:

[FOI 2021-00259890](#) details 582,000 salmon smolts imported from Mowi Ireland via three shipments from Kindrum and Lough Altan in April 2020 for ongrowing at [Soil Association certified 'organic' sites at Loch Harport and Sconser](#) on the Isle of Skye (further imports of salmon parr were imported from Ireland by Mowi to Loch Ness and are subject of a further FOI):

Date consignment due	Destination site name	Destination business name (Site operator)	Number	Source Country	Import consignor	Import Site of Origin
04/04/2020	Loch Harport	Mowi Scotland	83,000	Republic of Ireland	Mowi Ireland	Kindrum Freshwater Unit
06/04/2020	Sconser	Mowi Scotland	249,500	Republic of Ireland	Mowi Ireland	Lough Altan Smolt Unit
08/04/2020	Sconser	Mowi Scotland	249,500	Republic of Ireland	Mowi Ireland	Lough Altan Smolt Unit

More details are presented via [Mowi's "100% Scottish" Salmon Imported from Ireland - 100% 'Organic' Bullshit!](#)

In terms of the claim by Mowi and Ocado that 'organic' farmed salmon is "raised responsibly", Scamon Scotland and Scottish Salmon Watch has presented extensive evidence of how Mowi's 'organic' salmon farms (certified via the Soil Association) have discharged shellfish-killing chemicals into the marine environment as well as suffered from lice-infestation, infectious diseases and precipitated other environmental impacts. Scamon Scotland maintains that 'organic' salmon is raised irresponsibly not responsibly.

Scamon Scotland believes that 'organic' salmon is a scam, sham and a consumer con. Shame on the Soil Association for corroding their 'organic' principles by certifying toxic salmon farms - read more via:

[Toxic Salmon Corrodes Soil Association's 'Organic' Principles](#)

[Please Ban Deltamethrin Use by Scottish Salmon Pharms!](#)

For example, Mowi's 'organic' and [ASC-certified salmon farm at MacLeans Nose in Loch Sunart/Sound of Mull](#) has reported a crustacean-killing 23 doses of toxic chemicals since January 2018 including the triple whammy of Azamethiphos, Deltamethrin and Emamectin benzoate use in August 2021 and 10 doses of toxic chemicals in the first nine months of 2021:

Date	Site Name	Submitted By	Azamethiphos (g)	Deltamethrin (g)	Emamectin Benzoate (g)
01-Aug-21	MacLeans Nose	Mowi Scotland	900	40	491.4
01-Jul-21	MacLeans Nose	Mowi Scotland	0	200	0
01-Jun-21	MacLeans Nose	Mowi Scotland	2250	0	0
01-May-21	MacLeans Nose	Mowi Scotland	900	0	0
01-Apr-21	MacLeans Nose	Mowi Scotland	6840	0	0
01-Mar-21	MacLeans Nose	Mowi Scotland	4160	0	0
01-Feb-21	MacLeans Nose	Mowi Scotland	2250	0	0
01-Jan-21	MacLeans Nose	Mowi Scotland	3150	0	210
01-Dec-20	MacLeans Nose	Mowi Scotland	0	0	98.8
01-Apr-20	MacLeans Nose	Mowi Scotland	1200.000018	0	0
01-Jul-19	MacLeans Nose	Mowi Scotland	1200.000018	0	0
01-Jun-19	MacLeans Nose	Mowi Scotland	1000.000015	0	441
01-May-19	MacLeans Nose	Mowi Scotland	2760	0	0
01-Apr-19	MacLeans Nose	Mowi Scotland	6060.000092	0	0
01-Mar-19	MacLeans Nose	Mowi Scotland	2400.000036	0	0
01-Feb-19	MacLeans Nose	Mowi Scotland	4000	0	0
01-Jan-19	MacLeans Nose	Mowi Scotland	690	0	0
01-Dec-18	MacLeans Nose	Marine Harvest	230.0000021	0	0
01-Jan-18	MacLeans Nose	Marine Harvest	600	0	0

Fish Farms Monthly Biomass and Treatment Reports

Fish Farm Monthly Biomass and Treatments Details	
Year	2021
Month	August
Submitted By	Mowi Scotland Ltd
Licence Number	CAR/L/1002965/V7
Licence active at time of report	CAR/L/1002965
Report for Site	MCLN1 MacLeans Nose
Max licensed biomass on site (tonnes)	3000
Actual biomass on site (tonnes)	2345
Biomass Exceedance (tonnes)	0
Feed (kg)	597622
Mortalities (kg)	12526.40
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	900
Cypermethrin	0
Deltamethrin	40
Emamectin Benzoate	491.40

Location Details	
Receiving Water	Sound of Mull
National Grid Reference	NM52396213
View on Map	View on map
Data supplied by SEPA on 04/12/2020	

Mowi's other 'organic' salmon farm in Loch Sunart at Invasion Bay used 13 doses of toxic chemicals between January 2019 and June 2021 including [lobster-killing Deltamethrin](#) and [crustacean-killing Emamectin benzoate](#):

Date	Submitted By	Site Name	Deltamethrin (g)	Azamethiphos (g)	Emamectin Benzoate (g)
01-Mar-20	Mowi Scotland	Invasion Bay	70	1800.000027	0
01-May-19	Mowi Scotland	Invasion Bay	0	1700.000063	0
01-Jun-19	Mowi Scotland	Invasion Bay	0	1515.00006	307.5
01-Feb-20	Mowi Scotland	Invasion Bay	17.5	1200.000009	0
01-Mar-19	Mowi Scotland	Invasion Bay	0	600.0000238	0
01-Oct-19	Mowi Scotland	Invasion Bay	0	600.0000179	0
01-Jul-19	Mowi Scotland	Invasion Bay	0	600.0000089	0
01-Jan-19	Mowi Scotland	Invasion Bay	0	450	0
01-Jan-20	Mowi Scotland	Invasion Bay	0	400.000006	0
01-Feb-19	Mowi Scotland	Invasion Bay	0	300	0

More information on Mowi's use of toxic chemicals is detailed via:

[Organic Scamon: Ocado Challenged Over Mowi's 'Responsibly' Farmed Salmon - 100% Bullshit not 100% Scottish!](#)

[Mowi's Pure Bullshit \(#1 in a regular series\): "hardly any chemical treatments at all"](#)

[Toxic Scottish Salmon - Chemical Use Doubles Since 2018!](#)

[Mowi's 'Host' With the Most....Toxic Chemicals & Antibiotics \(certified as "responsibly farmed" by the ASC\)!](#)

In November 2021, [Scottish Salmon Watch filed complaints against supermarkets - including Sainsburys and Tesco for marketing Mowi Scottish salmon as "responsibly farmed" - with Advertising and Trading Standards.](#)

Scottish Salmon Watch [wrote to the Advertising Standards Authority on 19 November 2021](#) attaching substantive evidence to counter Mowi's "responsibly farmed" claim:

Here's a complaint filed by Scottish Salmon Watch and Animal Concern which includes 'hard evidence' against Mowi's "responsibly farmed" Scottish salmon:

[Complaint to the Advertising Standards Authority Vs 'Responsibly Farmed' Mowi Scottish salmon as advertised by Tesco & Sainsbury's \(19 November 2021\)](#)

Hopefully you can take enforcement action against Tesco and Sainsbury's and work with CMA and Trading Standards to address the issue of deceptive marketing and misleading advertising of "responsibly farmed" and "responsibly sourced" Scottish salmon.

The Competition and Markets Authority report ['Green Claims Code' \(20 September 2021\)](#) gives scope for coordinated action to address false environmental claims in relation to Scottish salmon.

There is certainly overlap in our complaints and the ASA is copied into:

[Complaint to the Competition & Markets Authority and Trading Standards Vs Supermarkets \(Aldi, ASDA, Lidl, M&S, Morrisons, Sainsbury's, Tesco & Waitrose\) for deceptive marketing of 'Responsibly Farmed' & 'Responsibly Sourced' Scottish Salmon \(19 November 2021\)](#)

[Hard Evidence Submitted with CMA & Trading Standards Complaint \(19 November 2021\)](#)

Finally, as detailed in our complaint last week, Scamon Scotland takes issue with Ocado's marketing claim that: "MOWI organic salmon (and their feed) is fully traceable plus independent and regularly audited to ensure a responsible use of the environment".

The Soil Association profits from certification of farmed salmon as 'organic' even if it is lice-infested and it is farmed via the use of toxic chemicals. Nor has the Scottish Environment Protection Agency (SEPA) - the one truly independent agency responsible for auditing environmental impacts - regularly or recently conducted any environmental monitoring surveys or concluded in any shape or form that Mowi is responsible.

In fact, The Ferret and Sunday National reported on Sunday (6 February 2022) that SEPA has not been able to perform their environmental functions for years due to a cyber attack:

<https://theferret.scot/pollution-data-lost-cyber-attack/>

Scamon Scotland understands that the Scottish Environment Protection Agency no longer conducts environmental monitoring surveys or audits of salmon farms - please read:

<https://theferret.scot/fish-farm-pollution-rules-relaxed-brexit/>

<https://theferret.scot/environmental-rules-salmon-farming-relaxed/>

In fact, there is no published data on environmental monitoring surveys since March 2020:

http://aquaculture.scotland.gov.uk/data/environmental_monitoring_surveys.aspx

And there is no published data on environmental surveys for chemical residues under salmon farms since July 2020:

http://aquaculture.scotland.gov.uk/data/sealice_in_feed_treatment_residues.aspx

Scamon Scotland therefore asks Mowi to substantiate the claims made via Ocado's 'organic' salmon.

In the spirit of transparency, I have also copied into this email the Soil Association who certify Mowi's lice-infested and chemically embalmed salmon as 'organic'.

As Scamon Scotland explained to Ocado yesterday:

At the end of this week, Scamon Scotland will therefore be filing a formal complaint with Trading and Advertising Standards.

If Mowi wishes to provide substantive documentation to back up the misleading claims identified above then please do so by 4pm on 11 February 2022.

Alternatively, Mowi can provide the information to Trading and Advertising Standards at a later date.

Thanks,

Don Staniford

Director, Scamon Scotland