

Scottish Salmon Watch, 23 April 2020



Censored: Welfare Abuse on Salmon Farms

- Redacted FOI documents reveal welfare breaches by RSPCA Assured Mowi
- Mowi's "Failure to Comply With Welfare Legislation" at 'Bay of the Dead Heads'
- 80% of lumpfish subjected to increasing suffering, disease & ongoing mortality
- Whistleblower exposes breaches of biomass, mortalities & disease at Mowi's Isle of Muck salmon farm (video footage showing fatty oil slick)
- APHA blocks disclosure claiming photos are 'commercially sensitive' & refuses FOI citing "negative publicity" to salmon farming companies

Welfare abuse on salmon farms across Scotland is being systematically covered up [according to censored documents obtained via Freedom of Information](#). The heavily redacted reports, letters and emails were finally disclosed last month by the Animal & Plant Health Agency (APHA) - the government body responsible for policing fish welfare - after months of delay [1]. The commercially sensitive documents included [damning evidence of welfare abuse by Mowi](#) at the aptly named 'Bay of Dead Heads' salmon farm in the Sound of Jura.



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Strathearn House
Broxden Business Park
Lamberkine Drive
Perth
PH1 1RX

Mowi Scotland Limited

Farms Office

Glen Nevis Business Park
Fort William
PH33 6RX

16 September 2019

Dear [REDACTED]

Failure to Comply with Welfare Legislation

Animal Health and Welfare (Scotland) Act 2006

You have not been able to show that adequate actions were taken in the period between the 10/07/19 to the 12/08/19 in order to promote the welfare of the lumpfish under your responsibility. Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease.

This is a failing to comply with the Animal and Welfare (Scotland) Act 2006, Part 2-24 (1) and 3(e) that states that:

"a person commits an offence if the person do not take such steps as are reasonable in the circumstances to ensure that the needs of an animal for which the person is responsible are met to the extent required by good practice";

An animal's needs include *"its need to be protected from suffering, injury and disease."*

APHA's investigation into Mowi's feedlot within the [Argyll Hope Spot](#) in August 2019 was triggered by [secret video footage shared by Scottish Salmon Watch in July 2019](#) (although documents reveal that APHA initially classified the welfare risk as 'low' priority).



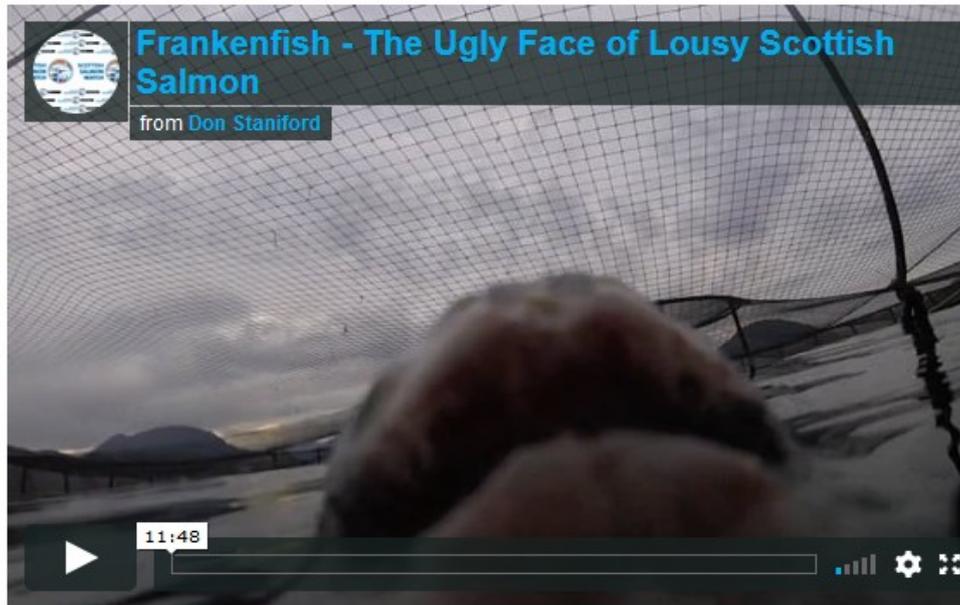
Other documents disclosed by APHA included welfare complaints and inspections relating to [Mowi](#), [The Scottish Salmon Company](#), [Loch Duart](#), [Grieg Seafood](#) and [Scottish Sea Farms](#).

The FOI disclosure details around a dozen salmon farms investigated/visited by APHA (mostly in conjunction with the Fish Health Inspectorate) since January 2018 - including:

- Mowi's aptly named Muck salmon farm ([certified as welfare friendly via RSPCA Assured](#)) which was the subject to an anonymous tip-off regarding mortalities due to disease and a failed Hydrolicer treatment and [biomass breaches](#) in August 2019 (including [video footage](#) of a fatty oil slick and photos of dead fish).



- The Scottish Salmon Company's Aird salmon farm in Loch Shieldaig where [welfare abuse](#) (including [blind fish covered in lesions and boils](#)) was [uncovered via secret filming by Scottish Salmon Watch in June 2019](#) leading to [coverage on STV News](#).



- The Scottish Salmon Company's [lice-infested salmon farms at Maragay Mor and Maaey](#) (official 'Mortality Event Reports' show that [268,388 morts were reported at Maaey in 2019 in 22 incidents](#) blamed on mechanical lice treatments, Pancreas Disease and Cardiomyopathy Syndrome) which were inspected by APHA in June 2019.



- Mowi's [RSPCA Assured](#) Lochailort Hatchery which was the subject of a tip off in March 2019 following the deaths of over 1.5 million salmon (50% mortality) [reported as 'human error'](#).

- Mowi's [disease-ridden North Shore salmon farm in Loch Erisort on the Isle of Lewis](#) which was inspected in November 2019 following a suggestion by the Scottish Government's Fish Health Inspectorate (all Mowi sites are certified via [RSPCA Assured](#)).



- Loch Duart's [RSPCA Assured](#) salmon farm in Loch Laxford and Duartmore Hatchery which were the subject of a complaint in January 2019.

APHA's FOI disclosure is censored and so heavily redacted that rafts of the documents are blackened out rendering them impossible to decipher.

[REDACTED]

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

[REDACTED]

[REDACTED]

"Mowi's failure to follow welfare legislation at 'Bay of the Dead Heads' is just the tip of the iceberg," said Don Staniford, Director of [Scottish Salmon Watch](#) and author of '[Scottish Scamon](#)'. "Welfare abuse on salmon farms in Scotland during 2019 was horrific and 2020 threatens to be even worse. [Relaxed rules due to Coronavirus](#) will inevitably lead to increasing biomass on salmon farms thereby exacerbating [welfare problems](#). Rising water temperatures coupled with less scrutiny by government agencies is a recipe for mass mortalities, infectious diseases and further breaches of welfare laws."



"APHA has shamefully censored rafts of documents citing commercial harm to companies disregarding fish welfare," continued Staniford who today [filed an appeal with the Information Commissioner](#) and a [FOI review request with APHA](#). "The public surely have a right to know the depth of welfare abuse on salmon farms - [ca. 70% of which are certified as 'welfare friendly'](#) via [RSPCA Assured](#) (including all Mowi sites). APHA's statutory duty of care to the welfare of fish must take priority over commercial interests even if it does lead to negative publicity and financial harm to companies. Judging by the [gruesome photos](#) it is painfully obvious that APHA is flouting both welfare and FOI laws to conceal the [shameful truth about factory farmed salmon](#). Please [pledge to boycott all Scottish salmon!](#)"

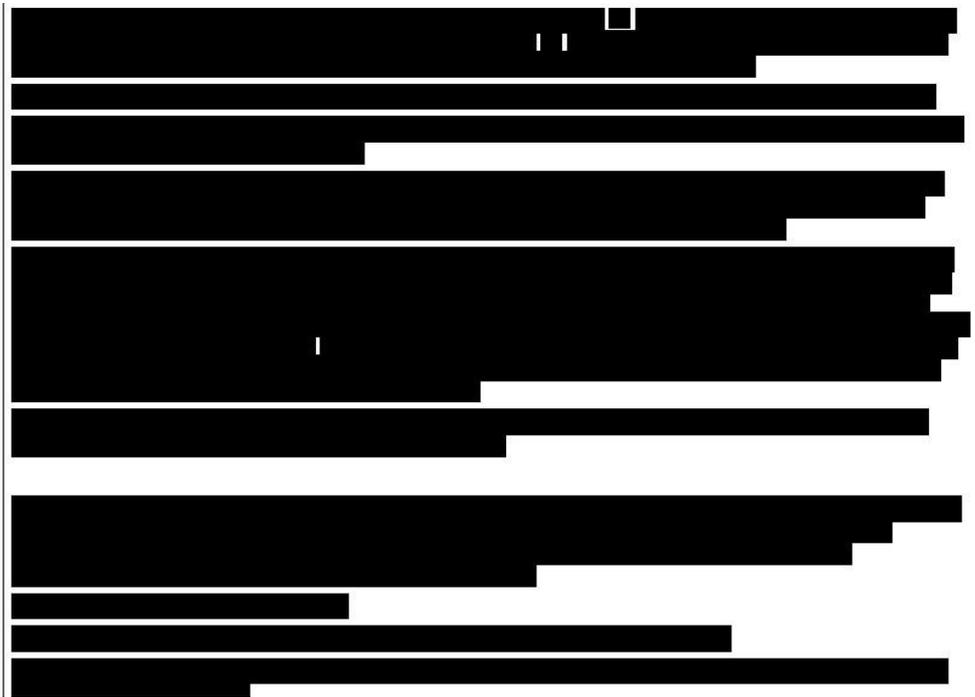


Contact:

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

Appealing APHA's Non-Disclosure & Protection of Commercial Interests

Scottish Salmon Watch today (23 April 2020) [filed a formal request for a review of APHA's refusal via ATIC1896 to disclose detailed information on welfare abuses on salmon farms in Scotland](#) and [filed an appeal with the Information Commissioner with respect to APHA's refusal to disclose photos via ATIC1836](#) (both replied to on 10 March 2020).



The FOI disclosure on 10 March 2020 is heavily redacted with [APHA's refusal letter citing 'Prejudice to Commercial Interest'](#):

Section 43 – Commercial Interests

Within the forms provided, APHA has withheld commercially sensitive information which has been provided to them by a third party. Following considerations into this request, APHA have considered the level of harm and the impact possible disclosure would have and have withheld this information under Section 43(2) – Prejudice to Commercial Interest.

APHA's [letter dated 10 March 2020](#) argued:

The disclosure of the information you have requested has the potential to prejudice the commercial interests of the 3rd party and breach confidentiality between APHA and the farm. We believe that a breach of this confidentiality could potentially lead to an adverse working relationship and would interfere with APHA carrying out its statutory duties. The data recorded during our inspections is part of our business in order to determine the weight of any allegations and to undertake regular inspections in order to identify any non-compliances. We also believe in releasing information on a particular farm could interfere with the business and running of a farm in completion with its competitors. APHA record this information in the course of welfare inspections.

APHA also refused to disclose information [citing in their letter dated 10 March 2020](#):

Section 31 - Law Enforcement

Section 31(1)(g) states:

31 – (1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice –

(g) the exercise by any public authority of its functions for any of the purposes specified in subsection (2)

This is read in conjunction with the following sub sections:

- 31 – (2)(a) the purpose of ascertaining whether any person has failed to comply with the law,

APHA's [letter dated 10 March 2020](#) argued:

We recognise that there is a public interest in disclosure of this specific information in order to increase transparency and aid well-informed debates concerning our work on investigating farm welfare complaints. However, the public interest in withholding the information arises from the fact that investigations concern the fish welfare and if necessary, ability to continue inspections for any improvements. Release of investigatory information will disrupt this process and would be likely to prejudice the ability for the Local Authorities and/or Fish Health Inspectorates to perform their functions.

Therefore we have concluded the public interest in withholding this part of the information outweighs that in disclosure.

APHA apologized to Scottish Salmon Watch that the FOI disclosure was several months late. "We are working on your requests and they have not been forgotten," [wrote APHA in February 2020](#). "You will appreciate that the information you have requested is third party information and we are giving careful consideration on the public interest of release, which is one of the issues on the length of time taking to respond."

In October 2019, [APHA refused another FOI request \(ATIC1836\)](#) filed by Scottish Salmon Watch once again citing commercial confidentiality and "financial losses, whether through a loss of trust or custom or through the cost in time, or of repairing reputational damage".

Section 43

Section 43(2) of the FOIA exempts information if its disclosure under the Act would or would be likely to prejudice the commercial interests of any person. The exemption in Section 43 is subject to a Public Interest Test to ensure it is being appropriately applied.

Public Interest Test

APHA recognises that there is a general presumption in favour of openness and transparency concerning our work, and providing the general public with the right to request access to information held by public authorities.

However, APHAs relationship with Salmon Farmers and farms is based on trust. Releasing this information could prejudice the commercial interests of any such establishments and mislead the general public, who would base their opinions on such information even if any potential problems had been rectified. This could lead to financial losses, whether through a loss of trust and custom or through the cost in time, or of repairing reputational damage.

Furthermore, this would result in breach of confidentiality between APHA and its customers and could potentially lead to an adverse working relationship and interfere with the relevant Public Authority carrying out its statutory duties.

APHA have concluded that, the commercial interest of our customers outweighs that of the public right to know.

In reply to a [FOI review request filed by Scottish Salmon Watch filed back in October 2019](#) (APHA had a statutory duty to reply in December 2019), APHA repeated their refusal to disclose information via ATIC1836 in a [letter also dated 10 March 2020](#). APHA claimed that there would be "negative publicity" and prejudice the commercial interests if photographs were published.

Photographs held, as received from third parties will not be released under the following exemptions of the FOIA:

Section 31 - Law Enforcement

Section 31(1)(g) states:

31 – (1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice –
(g) the exercise by any public authority of its functions for any of the purposes specified in subsection (2)

This is read in conjunction with the following sub sections:

31 – (2)(a) the purpose of ascertaining whether any person has failed to comply with the law,

The photographs have been retained as part of a third party allegation of poor fish farm welfare. The photos are retained as part of the allegation to be investigated. The source of the investigation is also withheld. Investigations into allegations of poor welfare, particularly those protected by section 31(1)(g) via 31(2), can be aided by either individuals, or organisations providing information to the APHA. Such information is either volunteered by a confidential source, for example someone who has provided information on the understanding that they will not be identified and the information and identity of its source will be protected by section 30(2). However, even where the provider of the information is not a confidential source, APHA consider there is still a public interest in not releasing the details of those providing information so as to not discourage others from providing information on a voluntary basis. This includes photographs.

Section 43 – Commercial Interest

The photographs have been provided by third parties. Following considerations into this request, APHA have considered the level of harm and the impact possible disclosure would have and have withheld the photos under Section 43(2) – Prejudice to Commercial Interest.

The third party provided photos are part of allegations made from anonymous (or otherwise) sources. It may be harmful should the photos be released as APHA cannot verify the photos. If released, the photos could cause the farms negative publicity.

Public Interest Test

The exemption in Section 43 is subject to a Public Interest Test to ensure it is being appropriately applied.

The disclosure of the information you have requested has the potential to prejudice the commercial interests of the farm. We believe that in releasing unverified photographs could potentially lead to an adverse working relationship between APHA and the farm interfering with us carrying out our statutory duties. Releasing photos alleged of a particular farm could interfere with the business and running of a farm in completion with its competitors.

Scottish Salmon Watch today (23 April 2020) [filed an appeal with the Information Commissioner](#).



Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

23 April 2020

Dear Sir/Madam,

**Appeal re. APHA's FOI refusal via ATIC1836
- Photographs of farmed salmon & salmon farms**

Please consider this a formal appeal against the [FOI refusal by the Animal & Plant Health Agency \(APHA\) via ATIC1836 on 10 March 2020](#).

As background, Scottish Salmon Watch filed a FOI request on 16 September 2019; APHA replied on 11 October 2019 and Scottish Salmon Watch requested a review on 25 October 2019. APHA's review reply was over 3 months late and refused to disclose the information requested (details via [APHA FOI Dossier](#)).

Scottish Salmon Watch's [appeal to the Information Commissioner](#) (APHA is based in England so it is not under the jurisdiction of the Scottish Information Commissioner who [ruled in favour of Scottish Salmon Watch back in October 2019](#) forcing the Scottish Government to [disclose information it deemed commercially damaging in December 2019](#)) included:

Scottish Salmon Watch strongly disagrees with APHA's application of the 'Public Interest Test' and assertion of the rights of companies to blanket confidentiality (as evidenced by APHA's heavy-handed redaction of documents) over and above the public's right to know.

APHA's claim that "releasing photos alleged of a particular farm could interfere with the business and running of a farm in competition with its competitors" is moot in relation to Mowi's Muck salmon farm since the photos and [video footage](#) have already been published.

Moreover, [gruesome photos of Mowi's salmon farms and its competitors](#) have been routinely published via the Scottish Government's 'Case Information' (currently up to February 2020).



APHA is clearly placing their "working relationship" with salmon farming companies ahead of their statutory priorities with respect to animal welfare and policing the Animal Health & Welfare (Scotland) Act 2006 in particular. Scottish Salmon Watch strongly believes that commercial confidentiality cannot be permitted to thwart transparency and public accountability.

It is a shocking admission that APHA "do not hold any photographs taken during inspections". Are they too busy having a cup of tea with their salmon farming buddies to bother to properly inspect for welfare abuse? If APHA was serious about prosecuting companies for breaches of welfare laws it would take video and photographic evidence.

Whatever the reasons for APHA's abject failures to properly inspect salmon farms and police welfare laws (Corin Smith's ['An Autopsy Of An All Clear'](#) is illuminating in that regard), Scottish Salmon Watch asks the Information Commissioner to overturn APHA's FOI refusal.

It is not APHA's job to "verify the photos" from third parties. Surely it is APHA's job to get their hands dirty and take photographs and video footage of welfare abuse on salmon farms themselves (as Scottish Salmon Watch and others have done)?

Scottish Salmon Watch also [filed a FOI review request with APHA today \(23 April 2020\)](#).



Animal and Plant Health Agency
Access to Information Manager
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New Haw
Addlestone
Surrey
KT15 3NB
enquiries@apha.gov.uk

23 April 2020

Dear Sir/Madam,

Review Request re. ATIC1896 - Information relating to inspections of salmon farms since 1 January 2018

Please consider this a formal request for a review of ATIC1896 which [APHA replied to on 10 March 2020](#) and which [Scottish Salmon Watch filed as a FOI on 12 November 2019](#).

In summary, Scottish Salmon Watch strongly object to the Draconian redaction which renders the FOI disclosure impossible to decipher as well as the omission of documents due to commercial confidentiality.



Scottish Salmon Watch's [FOI review request to APHA](#) included:

Did APHA's censor in chief receive a bumper pack of black pens for Xmas?

As part of your review, please explain the substantive difference in the extent of the redaction between ATIC1490 in November 2018 and ATIC1896 in March 2020. And please remove the redaction from APHA's documents.

To be blunt, this reasoning reads as complete gibberish and makes no sense at all. Transparency is vital to raising welfare standards on salmon farms and that means disclosing the information requested (redact personal information by all means). APHA claims to recognise a public interest in aiding "well-informed debates" but how can the public be informed if APHA redacts so heavily?

APHA's claim that the release of information "will disrupt" investigations and "prejudice the ability of Local Authorities and/or Fish Health Inspectorates to perform their functions" is laughable, especially [in view of the full and transparent disclosures by the Fish Health Inspectorate via 'Case Information', 'Mortality' data and 'Sea Lice' data published online every month and reported publicly.](#)

Moreover, APHA's suggestion that disclosure "could potentially lead to an adverse working relationship and would interfere with APHA carrying out its statutory duties" reeks of an industry love-affair. It is difficult not to conclude that APHA is interested more in being compliant with industry who it clearly views as a client rather than acting on behalf of animals investigating non-compliances of welfare laws.

Surely APHA's statutory duty of care is to upholding animal welfare laws via policing the Animal Health & Welfare (Scotland) Act 2006 rather than appeasing companies guilty of obvious welfare abuse?

In 2018, [lawyers acting for The Scottish Salmon Company and Scottish Sea Farms tried \(unsuccessfully as it turned out\) to the block publication of damning photos of disease-ridden salmon arguing that disclosure would cause "reputational damage".](#) In 2019, [The Ferret revealed](#) that Mowi, The Scottish Salmon Company and Scottish Sea Farms had lobbied against the publication of photos of diseased salmon via FOI.



The Scottish Government defied concerted pleas by salmon farming multinationals to keep photos of diseased and damaged fish secret, according to internal emails.

Instead, ministers decided to regularly publish graphic photos from official fish health inspections of caged salmon farms in line with their duties under freedom of information law.

In December 2018, the government sent a letter to stakeholders promising a "move towards active publication" of fish health information including photos. Then in March 2019 the government decided that photos would be published with [case studies every month.](#)

In February 2020, Scottish Salmon [published a dossier of photos of diseased and deformed salmon obtained via FOI, secret filming and whistleblowers.](#)



For more background read:

[Scottish Salmon Watch FOI review request to APHA 23 April 2020](#)

[Scottish Salmon Watch appeal to Information Commissioner 23 April 2020](#)

[APHA FOI Dossier \(April 2020\)](#)

[APHA FOI Response ATIC1896 10 March 2020](#)

[APHA FOI Response Internal Review ATIC1836 10 March 2020](#)

[APHA FOI Refusal 11 Oct 2019 ATIC1836](#)

Appalling Pathetic Horrific Abject (APHA) - Failing Fish Welfare Since 2013!

The week before APHA's FOI disclosure on 10 March 2020, [APHA's Jenni Diffin told the Fish Veterinary Conference in Edinburgh that there had been a significant increase in welfare complaints over the last 18 months](#) [2]. However, it is clear that APHA's track record in investigating welfare abuse on salmon farms is absolutely pathetic due largely to a lack of resources and lack of inspections as well as a 'reactive' not proactive policy of policing.

A damning report - '[An Autopsy of An All Clear](#)' - by Corin Smith published in September 2019 detailed systemic failures in how APHA and the Scottish Government policed animal welfare at a [lice-infested salmon farm operated by The Scottish Salmon Company in Loch Roag](#) [3].



Scottish Salmon Watch's experience with APHA is similarly woeful. In November 2018, APHA refused to disclose information on salmon farms in Scotland via ATIC1490 citing commercial confidentiality [4] - a mantra repeated via FOI refusals in 2019 and 2020.

In October 2018, APHA disclosed various background documents on salmon farm inspections via ATIC1426 at least shedding some light on how APHA has allowed salmon farms to slip through the welfare net [5].

According to the FOI reply (ATIC1426), APHA (known as AHVLA prior to October 2014) only carried out its first inspection of a salmon farm in 2013 even though the [Animal Health & Welfare \(Scotland\) Act came into force in 2006](#). APHA admitted in 2012 that they only had a budget for two to three visits to salmon farms per year due to the extra cost of inspections at sea farms compared to land farms. Moreover, APHA admitted in 2017 that it did not carry out any inspections of fish farms in 2016/17 due to resources going to England (believed to be re-directed to the badger cull).

A document dated 2012 admitted that "Volumes of welfare visits will be low so approx 2-3 per annum but distances travelled and time could be significant. Therefore is expected the overall cost of fish welfare visits are likely to be much greater than the unit price for land based farm visits".

"AHVLA [the forerunner to APHA prior to October 2014] is ready to respond to reactive welfare work in relation to farmed fish," continued the report titled 'Welfare Visits to Farmed Fish Premises'.

APHA explained to Scottish Salmon Watch in a letter in September 2018:

In 2012 Scottish Government asked AHVLA (now APHA) to develop capability to respond to welfare complaints regarding farmed fish. The intention was that AHVLA vets would develop an understanding of the context of fish farming, develop knowledge of the veterinary issues and be able to work with the FHI to ensure that effective action could be taken in cases of non-compliance with welfare legislation. AHVLA would contribute their expertise as regulators and experience of liaison with enforcement agencies if required.

As part of the AHVLA/APHA response, vets have been carrying out scheduled joint inspections with the FHI of fish farms since 2013.

APHA reported internally in 2015:

Fish Farming – Animal Welfare and training report 2014/15 & 2015/16

Background

Scottish Government has requested that APHA carry out welfare visits to fish farms on their behalf. These visits are mostly demand led as a result of a welfare complaint received by AHPA. In addition, joint planned visits with Fish Health Inspectorate (FHI) inspectors are carried out by trained VO/SVIs. It is intended that all fish welfare trained vets conduct either a demand led or planned visit each year to continue their training.

Fish Farm Welfare 2014/15

Of the six VOs trained in March 2012, by January 2015 there were only two remaining, [REDACTED] and [REDACTED], the others having left the organisation.

There were two fish welfare complaints investigated and one routine visit carried out in the 2014/15 reporting year. Only one routine fish farm visit was completed due to higher priority welfare complaints being received and a lack of resources. A brief outline of the welfare cases, involving trout in transport and high mortality in salmon, is listed below.

2. Salmon deaths due to sea lice infestation. November 2014

SEPA reported to the Local Authority (LA) an issue concerning the incorrect disposal of dead salmon to landfill. The LA then approached APHA for advice on [REDACTED]. On investigation it was found that there had been a mortality spike related to sea lice infestation that had resulted in the increased number of dead salmon that had to be disposed of. The rise in mortality was due to the poor response to treatment with organophosphates then followed by a treatment with hydrogen peroxide after which the mortality spike occurred. Apparently a

combination of factors were probably at play notably higher water temperature, lower oxygen levels, gill irritation due to hydrogen peroxide and stress due to crowding for treatment all would have contributed to cause the rise in mortality. By the time the case had been reported, the site was empty.

Fish Farm Welfare 2015/16

As there were only two remaining fish welfare trained APHA vets by January 2015, a business case was successfully made to run another training course provided by [REDACTED], [REDACTED]. In consultation with the [REDACTED], a programme was produced and run in June 2015. The training course was delivered over one and a half days and was tailored to the needs of APHA concentrating on the welfare aspects of fish farming. It was attended by five APHA vets and four FHI inspectors. This now bring the number of fish welfare trained vets in Scotland back up to six, located in the [REDACTED] offices and are listed below.

[REDACTED]

APHA reported internally in January 2017:

The fish visits have not happened for 2016/17 but are scheduled for February. I am concerned about resource and the wisdom of organising fish farm visits, I would actually favour pushing these back to the late spring or summer - but would not want to send the message that we are not delivering for SG because of resource going to help the [REDACTED] in England.

In July 2018, Scottish Salmon Watch wrote to APHA:

"Scottish Salmon Watch understands that it is APHA not Marine Scotland who is the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. As [Scottish Salmon Watch's letter dated 13 July 2018](#) cited:

[A letter from Jill Barber, Aquaculture Health, Welfare and Innovation Manager, at the Scottish Government dated 9 July 2018](#) also identifies the [Animal and Plant Health Agency \(APHA\)](#) as the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006:

Fish Health Inspectors will report any significant case of poor welfare to Animal and Plant Health Agency (APHA) veterinarians, responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. If APHA suspect that an offence may have been committed under the Act, there are various enforcement options including issuing advice, warning letters and care notices, and the option of passing evidence for a potential prosecution to the Procurator Fiscal to consider.

In August 2018, APHA replied to Scottish Salmon Watch:

Fish Health Inspectors report any significant case of poor welfare to the veterinarians in the Animal and Plant Health Agency, who are responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006.

If APHA suspect an offence under the 2006 Act may have been committed, there are various enforcement options including issuing advice, warning letters and care notices as well as the option of passing evidence for a potential prosecution to the Procurator Fiscal to consider, as explained in our previous letter.

In September 2018, APHA replied to Scottish Salmon Watch's FOI request: "Could you please provide copies of all reports sent by Fish Health Inspectors to APHA since 2006?":



Animal and Plant Health Agency F 01932 357608
Access to Information Team
Weybourne Building
Ground Floor www.gov.uk/apha
Woodham Lane
New Haw
Aldershot
Surrey
KT15 3NB

Our Ref: ATIC1426

Don Staniford
{By Email}

18 September 2018

Dear Don Staniford

PROVISION OF REQUESTED INFORMATION

Thank you for your request for information salmon farm inspections which we received on 20 August 2018. Your request has been handled under the Freedom of Information Act 2000 (FOI).

The information you requested and our response is detailed below:

'Could you please provide copies of all reports sent by Fish Health Inspectors to APHA since 2006?'

After an extensive search of our paper and electronic records we can find no referrals from the Fish Health Inspectorate. It may help to provide a brief historical synopsis of the relationship between the Animal and Plant Health Agency (APHA) and the Fish Health Inspectorate (FHI).

Prior to 2012 we can find no records of any direct involvement of SVS/Animal Health/AHVLA/APHA with the FHI. Farmed fish are covered by the Animal Health and Welfare (Scotland) Act 2006 but not by Welfare of Farmed Animals (Scotland) Regulations 2010.

On 16 July 2018, Scottish Salmon Watch [wrote to APHA and Police Scotland filing a formal complaint](#) against the salmon farming companies Marine Harvest, Scottish Sea Farms, the Scottish Salmon Company, Grieg Seafood, Cooke Aquaculture and Loch Duart for systematic breaches of the [Animal Health and Welfare \(Scotland\) Act 2006](#).

"With mass mortalities, infectious disease and welfare problems [expected to peak in late Summer and early Autumn](#), Scottish Salmon Watch recommends that Police Scotland and APHA conduct targeted inspections at salmon farms reaching maximum biomass and in the last few months of their harvest cycle," [wrote Scottish Salmon Watch](#).

On 18 July 2018, APHA replied:

Let me begin by saying that the APHA takes animal welfare very seriously and is determined where possible to enhance the UK's already high reputation in this respect. If APHA receive a specific welfare complaint about a fish farm, then a member of APHA staff, trained in fish welfare, will carry out an investigation accompanied by a Fish Health Inspector from Marine Scotland.

However, as the issues highlighted in your letter concern the methods used to control sea lice and gill disease, it would be more appropriate to address your concerns to Marine Scotland who will be able to provide a more comprehensive response to the issues you raise, since Fish Farms are the responsibility of the Fish Health Inspectorate of Marine Scotland who monitor farmed fish welfare as part of their inspection programme.

On 24 July 2018, Scottish Salmon Watch replied to APHA (copied to Scottish Ministers):

"APHA's reply is simply unacceptable and inadequate. By dismissing Scottish Salmon Watch's complaint and referring this serious matter back to Marine Scotland, APHA is ignoring its statutory responsibilities and abrogating its responsibilities to animal welfare."

The Animal & Plant Health Agency (APHA) is an executive agency, sponsored by the [Department for Environment, Food & Rural Affairs](#), the [Welsh Government](#) and [The Scottish Government](#).



"We work to safeguard animal and plant health for the benefit of people, the environment and the economy," claims [APHA's web-site](#).

APHA was formed in its current state on 1 October 2014, when the Animal Health and Veterinary Laboratories Agency (AHVLA) was expanded by adding parts of the [Food and Environment Research Agency](#) (FERA), including the Plant Health and Seeds Inspectorate (PHSI). AHVLA had originally been established on 1 April 2011 by a merger of two former agencies, [Animal Health](#) and the [Veterinary Laboratories Agency](#).

Media Backgrounder: Welfare Abuse at Mowi's 'Bay of the Dead Heads' & Beyond

APHA's inspection of Mowi's 'Bay of the Dead Heads' (Bagh Dail Nan Ceann) feedlot on 2 August 2019 was prompted by a [formal complaint filed in July 2019](#) by Scottish Salmon Watch who [secretly filmed](#) welfare abuse at the salmon farm [ranked by OneKind as the second worst in Scotland](#) (note that [Mowi changed their name from Marine Harvest](#) in 2019 due to [negative consumer perception](#)).

Table 1. The top 7 worst performing salmon farms for animal welfare in 2017.

Rank	Farm	Company	Mortality score	Escape score	Biomass score	Seal score	Sea lice score	Welfare score
1	Poll na Gille	Marine Harvest	0	3	3	3	2	11
2	MacLean's Nose	Marine Harvest	3	3	0	3	0	9
=	Bagh dail nan Ceann	Marine Harvest	0	0	3	3	3	9

Here's the shocking video footage of dead and dying lumpfish at Mowi's 'Bay of the Dead Heads' salmon farm [shot by Scottish Salmon Watch in July 2019](#).



Dying a Slow Death at Mowi's 'Bay of the Dead Heads'
Don Staniford



Dead in the Water - Mowi's Bad Movie from Bagh Dail n...
Don Staniford



Dead Cleaner Fish at Mowi's 'Bay of the Dead Heads'
Don Staniford



Mowi's 'Bay of the Dead Heads' (Bagh Dail nan Ceann)
Don Staniford

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

Here's [photos from Scottish Salmon Watch's secret visit to Mowi's 'Bay of the Dead Heads' salmon farm in July 2019.](#)



In June 2019, Marine Scotland's Fish Health Inspectorate visited Mowi's 'Bay of Dead Heads' feedlot [reporting](#) the abandonment of a [Thermolicer treatment](#) "as fish were not taking it very well" and "the fish were visible a brighter shade of blue (probably due to the stress of crowd, water temperature)". The [inspection report dated 26 June 2019](#) noted fish "with a clear fungal challenge" but the company vet "concluded that there was no visible health challenge with the lumpfish on site" even though there were "reports of lumpfish with craters disease":

Currently treating on site with a thermolicer. Treatment abandoned today as fish were not taking to it very well. (Hot weather) Fish in the pen that had been treated looked very lethargic, the fish were visible a brighter shade of blue (probably due to the stress of crowd, water temperature). The weather was very hot on the day of inspection which probably contributed to the abandoning of the treatment.

Winter input of lumpfish into ten pens. Site manager noted that he was pleased with lumpfish survival over the winter, however they have been having issues with mortality increasing with the warmer weather and rise in sea temperature. This was visible when inspecting the pens as some fish looked very lean, and others with a clear fungal challenge. There were a few pens where this was evident, however most pens this did not seem to be an issue from the inspection. Health challenges were reported by site workers to the company vet. Who visited the site to health check the lumpfish, the vets report concluded that there was no visible health challenge with the lumpfish on site.

Results of Surveillance

1. Has any animal health surveillance been carried out by, or on behalf of, the business? Y

2. If yes, are results available for inspection? Y

3. Any significant results? Y

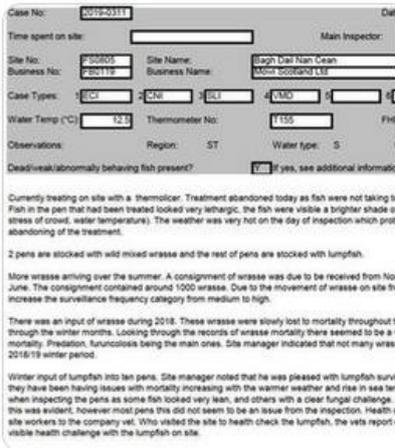
If yes, detail (if not detailed under recent disease problems). AGD detected at low levels. 2/10 fish positive.

Reports of lumpfish with craters disease - Fish health manager did observe any on site visit.

Records checked between:

 **Don Staniford**
@TheGAAIA

A Fish Health report for [@MowiScotlandLtd](#)'s Bagh Dail nan Ceann salmon farm in June 2019 cited Amoebic Gill Disease in farmed salmon & craters disease in lumpfish. "Issues with mortality increasing with the warmer weather" said [@marinescotland](#) tinyurl.com/yxv3psc2 [@SSPOsays](#)

9:17 PM · Aug 21, 2019 · Twitter Web App

When Scottish Salmon Watch [visited Mowi's 'Bay of Dead Heads' a week later on 2 July 2019](#) there were clearly visible health challenges with the lumpfish!



Another [Fish Health Inspectorate report for Mowi's nearby Port Na Cro salmon farm in Shuna Sound dated 26 June 2019](#) detailed 10,000 lumpfish mortalities with "fungus attributed to the warmer weather" as well as farmed salmon "hanging at sides" and "obvious mechanical damage from the Thermolicer".

42000 lumpfish put in at end of 2018 - 32000 left. Lots of mortality attributed to post treatment and summer weather. Lethargic and lean lumpfish could be seen swimming round the edges of the pens. There were a lot of healthy ones too. Some had apparent issues with fungus attributed to the warmer weather. Site manager noted that they do really well in the winter months but as the sea warms up in summer they see increases in mortality and increases mortality post treatment.

Don Staniford
@TheGAAlA

A health report for [@MowiScotlandLtd](#) in June 2019 cited "obvious mechanical damage from the Thermolicer"; 10,000 dead lumpfish "with fungus attributed to the warmer weather" & "Lethargic fish hanging at sides" (Pancreas Disease suspected) tinyurl.com/yxv3psc2 @marinescotland

Case No:	2019-0312	Date of visit:	26/06/2019
Time spent on site:	0hrs	Main Inspector:	
Site No:	PS0859	Site Name:	Port Na Cro
Business No:	PBU119	Business Name:	Mowi Scotland Ltd
Case Types:	1 ECI	2 CNI	3 SLI
	4 VMD	5	6
Water Temp (°C):	12.5	Thermometer No:	T155
		FHI 045 completed:	N
Observations:	Region: ST	Water type: S	CoGP MA M-40
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/> if yes, see additional information/clinical score sheet.		

Salmosan treatment - pen 1 (Thursday the second of may.) post treatment mortality - 2.4% Cumulative mortality lost from pen.

Thermolicer treatment. 15th of June. Good clearance reported after treatment. Pens that had been treated with the thermolicer more recently had some lethargic fish visible in the pens, some of which had obvious mechanical damage from the thermolicer treatment.

42000 lumpfish put in at end of 2018 - 32000 left. Lots of mortality attributed to post treatment and summer weather. Lethargic and lean lumpfish could be seen swimming round the edges of the pens. There were a lot of healthy ones too. Some had apparent issues with fungus attributed to the warmer weather. Site manager noted that they do really well in the winter months but as the sea warms up in summer they see increases in mortality and increases mortality post treatment.

Results of Surveillance

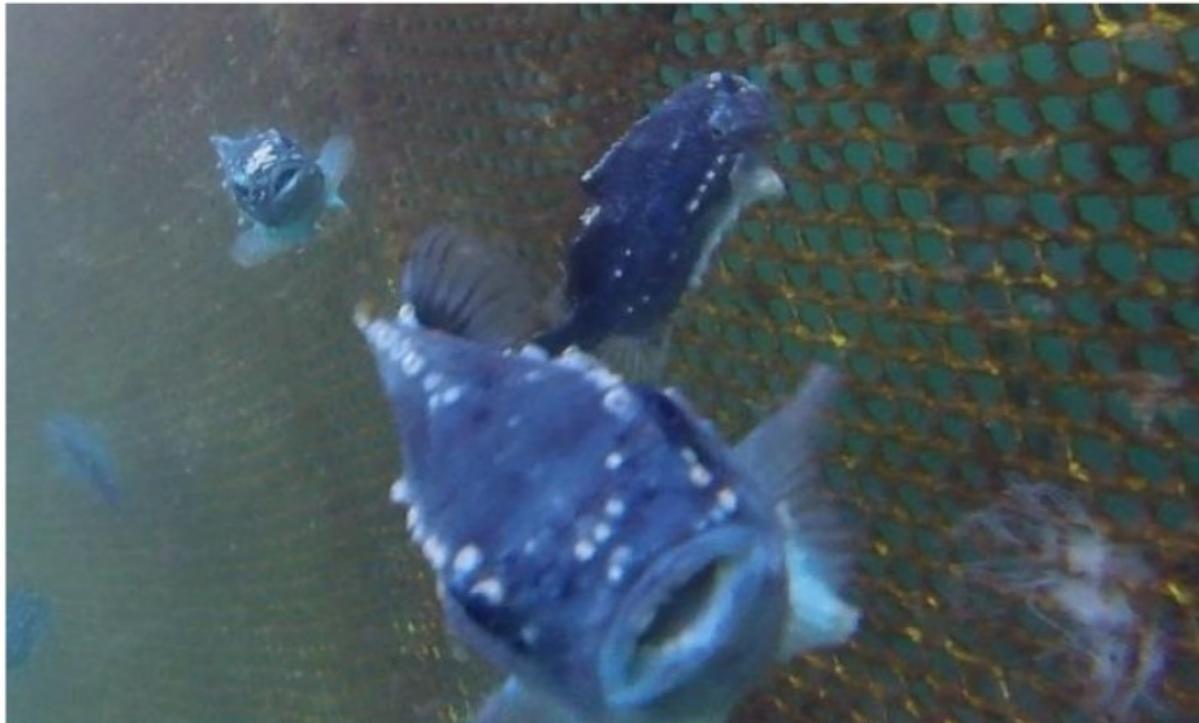
1. Has any animal health surveillance been carried out by, or on behalf of, the business?	<input type="checkbox"/>	Y
2. If yes, are results available for inspection?	<input type="checkbox"/>	Y
3. Any significant results?	<input type="checkbox"/>	Y

If yes, detail (if not detailed under recent disease problems). Health manager visited site. Observed sluggish and lethargic fish hanging at sides. Samples were taken to test for presence of SAV (PD)

9:08 PM · Aug 21, 2019 · Twitter Web App

Scottish Salmon Watch also [filmed on 1 July 2019 at the Shuna South West \(Rubh'an Trilleachain\) salmon farm operated by Mowi](#) (although owned by Kames) where the lumpfish exhibited what may be the 'craters disease' referred to by Marine Scotland (as [detailed in Scottish Salmon Watch's complaint dated 20 July 2019 to APHA, Police Scotland and the Scottish Government's Fish Health Inspectorate](#)).

The cleaner fish do not look particularly healthy.



A [Fish Health Inspectorate report dated 23 July 2019](#) for Shuna South West (Rubh'an Trilleachain) salmon farm stated that some lumpfish "appear to have some healed damage" and "a few mortalities of salmon and lumpfish were observed floating in some of the cages as these had not been removed yet by site staff for the day". The inspection report detailed "increased mortality of lumpfish, with bacterial infection suspected" including 6,813 lumpfish morts in July 2019 and another 5,076 lumpfish morts in December 2018 "due to bacterial infection" and 8,266 lumpfish morts in June 2019.

Recent (last 4 wks) disease problems?	Y	Any escapes (since last visit)?	N
If yes, detail:	Increased mortality of lumpfish, with bacterial infection suspected. Samples sent off in June 2019, hoping to do another in-feed treatment once the results are back.		

4. Recent mortality (last 4 wks):	SAL: between 0-42 morts per cage per day. Full mortality for the last 4 weeks 0.35% 2,235 morts. LUM: 1-23/7/19 6,813 morts current investigation ongoing suspecting bacterial infection		
5. Evidence of recent increased/atypical mortalities?	Y		
If yes, facility nos/no mortality per facility/no stock per facility/reason:	SAL: Volt Processor caused 335 morts in pen 2 on 12 July, this is new equipment being tested. Post treatment thermolicer morts between 58-97 per pen just for a single day. Not all pens being treated.		
6. Any other peaks in mortality during period checked?	Y		
	SAL: slight increase post input but within post input 6 week period (not reportable) 4.18% October 2018 LUM: December 2018 5,076 morts due to bacterial infection, down to 2,747 morts in Jan 2019 and further down in Feb 2019, starting to creep up again in April and May 2019, then 8,226 morts June 2019.		

The [Fish Health Inspectorate report dated 23 July 2019](#) cited "lesions resembling 'crater disease'".

Results of Surveillance	
1. Has any animal health surveillance been carried out by, or on behalf of, the business?	<input type="checkbox"/> Y
2. If yes, are results available for inspection?	<input type="checkbox"/> Y
3. Any significant results?	<input type="checkbox"/> Y
If yes, detail (if not detailed under recent disease problems).	LUM bacterial infection
12/7/19 SAL report post volt processor treatment in pen 2, causing damage to the fish. 8/7/19 LUM report, suspected bacterial infection, still waiting for results. Hoping to do another infeed treatment once results are back. April & May 2019 SAL some AGD lesions and PGD (jellyfish noted), May 2019 LUM showing lesions resembling "crater disease". December 2018 LUM bacterial infection noted in 7/8 fish sampled this corresponds with increased mortality. October 2018 SAL: increased post transfer morts attributed to physical damage and rough weather conditions.	
Records checked between:	12/02/2018 - 23/07/2019

Scottish Salmon Watch's [formal complaint of welfare abuse by Mowi](#) also triggered a further [inspection by Marine Scotland of Bay of the Dead Heads on 1 August 2019](#).

Case No:	2019-0376	Date of visit:	01/08/2019			
Time spent on site:	9 hours	Main Inspector:				
Site No:	FS0805	Site Name:	Bagh Dail Nan Cean			
Business No:	FB0119	Business Name:	Mowi Scotland Ltd			
Case Types:	1 WEL	2	3	4	5	6
Water Temp (°C):	13.6	Thermometer No:	T275	FHI 045 completed		
Observations:	Region:	ST	Water type:	S	CoGP MA	M-40
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.				
Clinical signs of disease observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.				

Additional Case Information:

Accompanying APHA inspectors to inspect the site following reports of a welfare concern in cleaner fish stock.

Lumpfish monthly mortality = Dec 18) - 816 01) - 2,207 - 02) - 3653 03) - 1195 04) - 3007 05) - 5055 06) - 9009 07) - 26860 08) - 2781

WRA - Dec 1015 1) 781 2) 597 3)518 4)723 5)510 6)599 7)907 8) 81 Total - 41473 since January

Florfenicol treatment for lumpfish in February 2019. Mortality came down in March, but began rising again in April.

127,878 total lumpfish over cycle ~22,000 remain on site with the majority dying from unknown causes.

The company SOP says Cleaner fish mortality should be reported to cleaner fish vet when back ground mortality levels reach 0.3% background mortality per day, however it appear that few checks were carried out between May and August, even with mortality rising.

13/06/2019 - Health report suggests Crator disease may be a cause of mortality in lumpfish stock. Systemic bacterial infection

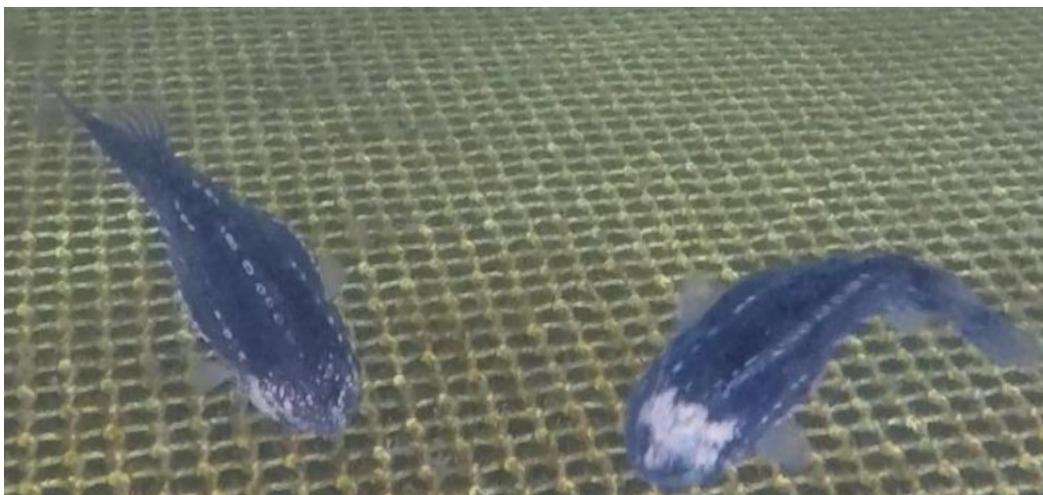
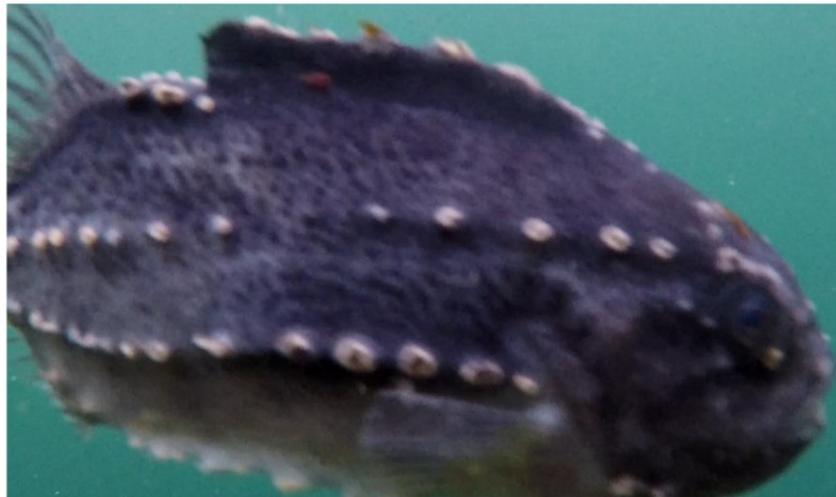
24/06 - There was a health inspection of the cleaner fish. There were signs of bacterial infection on the lumpfish with white nodules being present on the tips of spines. There was also a passive grade of the fish as well a thermolicer treatment.

31/07 - July 31st – Lumpfish have a known bacterial infection and no treatment plan is in place, as salmon are on harvest plans and starve days for treatment. However staff are removing infected lumpfish.

Situation at the site was not reflective of the mortality records. Very few fish were seen in general, possibly due to low number of fish left and of those fish ~3 displayed signs of disease. Samples were unable to be collected as there were very few moribund fish seen and all fish quickly scattered when approached with the net.

Treatments - Peroxide treatment WB 1st of July. Thermolicer treating from the 20th - 26th of June. Alphamax treatment on the 24th of July on pens 9 and 11. Slice treatment 1st June.

So out of 127,878 lumpfish only 22,000 survived (i.e. 105,876 died - that's less than 10%) with "Crator disease" cited as a potential cause of mortality along with "systemic bacterial infection". "There were signs of bacterial infection on the lumpfish with white nodules being present on the tips of the spines," [stated the FHI report dated 1 August 2019](#).



On 1 September 2019, [Mowi blocked Scottish Salmon Watch from getting close to their feedlots in the Sound of Jura and Shuna Sound](#) - including Poll Na Gille ([ranked the worst salmon farm in Scotland by OneKind](#)).



Marine Scotland's [Fish Health Inspectorate](#) visited Mowi's Poll Na Gille salmon farm on [19 September 2019](#) reporting disease and mortality problems with over 39,000 dead lumpfish (at up to 90% mortality).

Case No:	2019-0513	Date of visit:	19/09/2019
Time spent on site:	7h	Main Inspector:	
Site No:	FS0629	Site Name:	Poll Na Gille
Business No:	FB0119	Business Name:	Mowi Scotland Ltd
Case Types:	1 ECI	2 CNI	3 SLI
	4 VMD	5 DIA	6
Water Temp (°C):	13.9	Thermometer No:	T173
		FHI 045 completed	
Observations:	Region: ST	Water type: S	CoGP MA M-40
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Clinical signs of disease observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Gross pathology observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Diagnostic samples taken?	<input checked="" type="checkbox"/>		

Additional Case Information:

Lump fish were culled over week 36 (11,733 - 27.59%) and 37 (27,733 - 89.69%) during hydrolicer treatments, this was due to lumpfish not doing well in the pens and suffering from bacteria infection and poor gill health. There are only 3189 lumpfish left on the site.

Sadly, no photos were taken of the lumpfish but welfare abuse in the farmed salmon is painfully obvious with Heart & Skeletal Muscle Inflammation, Anaemia, Salmon Gill Poxvirus, Amoebic Gill Disease, haemorrhaging, lesions, necrosis and lice infestation [reported by the Fish Health Inspectorate](#).



Read more via "[Photo Dossier of Diseased, Deformed & Abused Scottish Salmon](#)"

In late October 2019, Mowi [admitted in a press release](#) that "health and welfare was not adequately managed" at their Bagh Dail Nan Ceann (Bay of the Dead Heads) salmon farm (this admission [prompted Scottish Salmon Watch's FOI to APHA on 12 November 2019](#)).

MOWI®

A recent inspection of Mowi's Bagh Dail nan Ceann farm by the Animal and Plant Health Agency (APHA) raised concern that lumpfish* health and welfare was not adequately managed during a month that saw the highest average sea temperatures.

On September 16th, 2019, APHA communicated to Mowi by letter that "You have not been able to show that adequate actions were taken in the period between 10/7/19 to the 12/08/19 in order to promote the welfare of the lumpfish under your responsibility. Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease."

Mowi staff have since met with APHA inspectors to discuss the agency's concerns and to ensure fish welfare remains top priority for the company and its employees.

In November 2019, [The Ferret reported](#) that "Norwegian-owned [Mowi](#), formerly known as Marine Harvest, has been criticised by the UK government's [Animal and Plant Health Agency \(APHA\)](#) for not protecting lice-eating fish from 'suffering and disease' at a west coast salmon farm in the summer."



"Mowi has [disclosed](#) that its Bagh Dail nan Ceann salmon farm in Loch Shuna north east of the island of Jura was visited recently by APHA inspectors," [reported The Ferret](#).

"In a letter in September 2019, APHA told the company that it had failed to take "adequate actions" between 10 July and 12 August to ensure the welfare of lumpfish. "Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease," APHA said."

The Ferret [continued](#):

Lumpfish are used by fish farmers to eat the lice that can infest caged salmon and damage them. Dead lumpfish at Bagh Dail nan Ceann – which some say translates as ‘Bay of the Dead Heads’ – [were filmed](#) on 2 July by the anti-fish farming campaigner, Don Staniford, who then filed a complaint to APHA.

The farm was also criticised in [a report](#) by the Scottish Government’s Fish Health Inspectorate after a visit on 26 June. Lumpfish had suffered “issues with mortality increasing with the warmer weather,” the report said.

“This was visible when inspecting the pens as some fish looked very lean, and others with a clear fungal challenge.”

In 2018 The Ferret [reported](#) that the Scottish animal campaigns charity, [OneKind](#), had ranked Bagh Dail nan Ceann as one of the worse for animal welfare in Scotland. That was based on an analysis of death rates, overcrowding, lice infestations and other factors in 2017.

On 7 November 2019 the Scottish Environment Protection Agency announced that it was planning to grant Mowi permission to increase the mass of salmon at Bagh Dail nan Ceann from 2,500 tonnes in 10 cages to 3,000 tonnes in 12 cages. Objectors say they will now ask the Scottish Government to intervene to prevent the expansion.



Dead fish at Mowi's Bagh Dail nan Ceann salmon farm

In January 2020, [Mowi warned against activists visiting salmon farms](#).



Read more via: ["Leave Our Farms Alone" Demand Mowi - Here's What They're Hiding & Why Mowi Want the Public to Keep Away!](#)

The staggering extent of mass mortalities and disease at Mowi's salmon farms in the Sound of Jura and Shuna Sound during Summer and Autumn 2019 was laid bare by the [publication of mortality data by the Scottish Government in January 2020](#).

Nearly 250,000 farmed salmon died in September and October 2019 at Mowi's Bagh Dail Nan Ceann salmon farm:

Reporting Business Name	Site Name	Date reported	Mortality rate recorded (%)	Explained reasons	Total mortality during event	Additional information
Mowi Scotland Ltd	Bagh Dail nan Ceann	20/09/2019	1.35	Suspect recent environmental gill insult involving gill bleeding. Mortalities with recent peroxide treatment for AGD	10652	Harvesting of worst affected pens has commenced
Mowi Scotland Ltd	Bagh Dail nan Ceann	03/10/2019	3.66	Suspect recent environmental gill insult with gill bleeding. CMS and P. skyensis also confirmed this week	27866	Site to be harvested out as quickly as possible
Mowi Scotland Ltd	Bagh Dail nan Ceann	07/10/2019	10.1	Pasteurella skyensis + complex gill disease	74060	Site is being harvested out
Mowi Scotland Ltd	Bagh Dail nan Ceann	10/10/2019	19.65	Pasteurella skyensis	92140	Harvesting out site
Mowi Scotland Ltd	Bagh Dail nan Ceann	18/10/2019	27.54	Complex gill disease/ Pasteurella skyensis	43000	Site now fallow

A further 149,575 farmed salmon died at Mowi's Poll Na Gille salmon farm between September to November 2019:

Reporting Business Name	Site Name	Date reported	Mortality rate recorded (%)	Explained reasons	Total mortality during event	Additional information
Mowi Scotland Ltd	Poll Na Gille	13/09/2019	1.18	Treatment losses, suspected fish had unknown environmental gill insult ahead of treatment	9362	Company vet visited.
Mowi Scotland Ltd	Poll na Gille	20/09/2019	4.21	Suspect recent environmental gill insult involving gill bleeding. Mortalities (fish with poor gills) with recent peroxide treatment for AGD	27665	Harvesting of worst affected pens has commenced
Mowi Scotland Ltd	Poll na Gille	10/10/2019	1.10	Complex gill disease + hydrolicer treatments	6079	Harvests from worst affected pens
Mowi Scotland Ltd	Poll na Gille	18/10/2019	4.08	Complex gill disease with bleeding gills/ physical treatment	21613	Harvesting worst affected pens
Mowi Scotland Ltd	Poll na Gille	23/10/2019	10.11	Anaemia, suspected Pasteurella skyensis	49795	Site due to be fallow by end of October
Mowi Scotland Ltd	Poll na Gille	01/11/2019	7.70	Complex gill disease + Pasteurella skyensis	31688	Harvesting out site

Shockingly, data on mortalities of cleaner fish - including lumpfish and wrasse - are not even collected let alone published (cite FOI reply on that).

Read more via: "[Mowi's Mass Mortalities Pile Ever Higher](#)" and "[Deadly Mowi - the Horror Story Continues!](#)"

Don Staniford
@TheGAIA

Mowi's Nightmare Before Xmas! tinyurl.com/v5uohqh
Here's the unlucky 13 salmon farms reporting the highest number of deaths in 2019 (over 1.36 million dead fish so far) @MowiScotlandLtd

Mowi's Mass Mortalities in 2019 (over 1.36 million dead salmon in 112 incidents)
- The Unlucky Thirteen Sites Reporting the Highest Deaths

- Bagh Dail nan Ceann: 247,718
- MacLean's Nose: 140,873
- Poll na Gille: 114,514
- SW Shuna: 95,590
- Muck: 92,164
- Ardintoul: 77,802
- Rum: 64,699
- Seaforth: 58,854
- North Shore: 50,521
- Soay: 36,372
- Port na Cro: 34,639
- Linnhe: 34,052
- Isle Ewe: 24,422



2:57 PM · Dec 13, 2019 · Twitter Web App

In March 2020, [Advocates for Animals](#) wrote to the Scottish Government questioning the use of the Thermolicer on welfare grounds.



Read more via:

[Advocates for Animals Challenge Scottish Government Over Salmon Farming Practices!](#)

[The National: "Scottish salmon farming tools 'break animal welfare rules'"](#)

[The Welfare Case Against the Thermolicer, Hydrolicer & Optilicer](#)

[Stop Thermolicing Farmed Salmon to Death - Ban Heated Torture Chambers!](#)

[Welfare Abuse on Scottish Salmon Farms - Legal Action Vs Scottish Ministers & Salmon Farming Companies](#)

[Media Backgrounder: The Welfare Nightmare of Scottish Salmon](#)

[Welfare Abuse at Scottish Salmon Farms - Why No Legal Enforcement Or Prosecutions?](#)



Earlier this month, Scottish Salmon Watch [reported on welfare abuse at Mowi's North Shore salmon farm in Loch Erisort.](#)



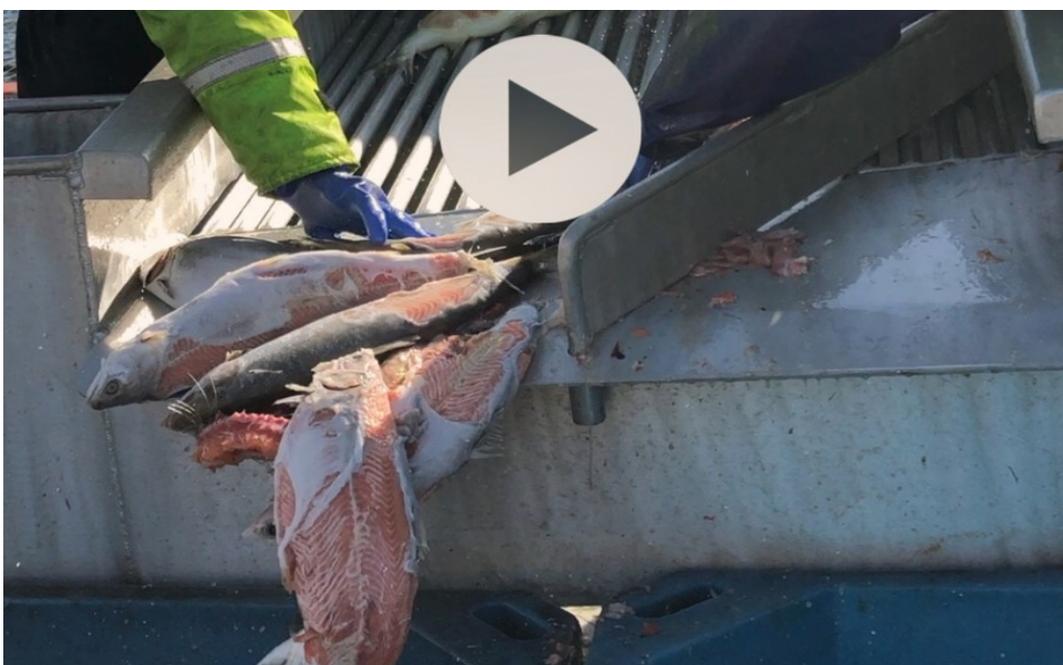
In February 2020, Scottish Salmon Watch [reported on new Scottish Government data on mass mortalities and welfare abuses at salmon farms across Scotland.](#)



APHA's FOI non-disclosure in March 2020 patently failed to address the [welfare disaster at Mowi's salmon farm at Carradale in Kilbrannan Sound in March 2018 when 300,000 fish were flayed alive and battered to death in the 'Beast from the East' storm.](#)



A [whistleblower leaked photos to Scottish Salmon Watch in November 2018](#) but it appears from the lack of documents disclosed via ATIC1986 that APHA did not even visit the site or question Mowi.



APHA appears to have also missed the [mass mortality of 500,000 farmed salmon at Mowi's Inchmore Hatchery in October 2018](#).



Scottish Salmon Watch will be filing a new FOI request asking APHA for information since ATIC1986 was filed in November 2019 - this may include documents relating to recent mass mortalities cited in [mortality data](#) and '[Case Information](#)' published by the Scottish Government's Fish Health Inspectorate.



Don Staniford
@TheGAAIA

Revealed: Scottish salmon suffocated to death
tinyurl.com/ta88ydp 99,369 died due to suffocation at
 Cooke's Cairndow Hatchery on Loch Fyne on 17/18
 January 2020 with over 340,000 morts in a year due to
 fungus & lesions. Failure to report mortalities
 @marinescotland @SSPOsays

Health Inspectorate case information: 2020

File: FHI case information relating to inspections and visits.

Additional information in g. action taken by company:

Action taken by FHI (include case n applicable):

Why during state:	Additional information in g. action taken by company:	Action taken by FHI (include case n applicable):
Difficulties on the screen due to quite conditions on Thursday night 18th Jan. Mortality on the 17th and 18th January: 224000 fish on site at time. Mortality for the site was 1.0% the week before and 0.4% the week after.		Collected during a site inspection. Increased mortality at time of inspect
High mortalities in spring 2018, poor water quality resulting in morts attributed to fungus and lesion only in C section.		Collected during a site inspection. Increased mortality at time of inspect
High mortalities in spring 2019, poor water quality resulting in morts attributed to fungus and lesion only in C section.		Collected during a site inspection. Increased mortality at time of inspect
High mortalities in spring 2018, poor water quality resulting in morts attributed to fungus and lesion only in C section.		Collected during a site inspection. Increased mortality at time of inspect

Fergus Ewing MSP and 9 others

10:07 AM · Apr 7, 2020 · Twitter Web App

Read more via:

[Be Sure to Boycott RSPCA Assured Scottish Salmon - Shocking New Photos Published of Mowi's North Shore Feedlot in Loch Erisort!](#)

[Mort Update \(Jan 2020\): 239,333 dead salmon via 30 'Mortality Event Reports'](#)

[Private Eye on Salmon Farming's 'Killing Fields'](#)

[The Killing Farms - Scottish Salmon's Horror Story Continues!](#)

['Moribund' Mowi: Salmon Gill Poxvirus, Amoebic Gill Disease & Anaemia at Ardintoul](#)

[All Sorts of Problems for Mowi in Loch Erisort \(Yet Again\)!](#)

[Update: Mass Mortalities Piling Up at Scottish Salmon](#)

[The Case Against Scottish Salmon](#)

[Revealed: Mowi's Nightmare in Loch Linnhe - 55% Mortality & Infectious Diseases](#)

**ITS LIKE A BAD
MOWI®**



Notes to Editors:

[1] On 10 March 2020, the Animal & Plant Health Agency disclosed 59 documents (mostly WF77 Initial Welfare Incident record forms; WF152 Fish Farm Inspection Reports and WF151 Report on Fish Welfare for Scottish Government) in relation to Mowi, The Scottish Salmon Company, Grieg Seafood, Scottish Sea Farms and Loch Duart:

Name	Size	Packed Size	Modified				
02a Appendix ML02a.pdf	40 155	30 376	2020-03-10 12:48	02 Appendix Air02.pdf	88 713	74 060	2020-03-09 12:20
05 Appendix LDA05.pdf	78 516	56 514	2020-03-10 12:21	01 Appendix Air01.pdf	49 087	40 722	2020-03-09 12:15
04 Appendix LDA04.pdf	162 280	134 278	2020-03-10 12:21	01 Appendix MNS01.pdf	142 611	116 308	2020-03-09 12:12
03 Appendix LDA03.pdf	63 645	45 585	2020-03-10 12:21	02 Appendix MCFF02.pdf	32 650	26 966	2020-03-09 12:00
02 Appendix LDA02.pdf	68 875	50 550	2020-03-10 12:21	01 Appendix MCFF01.pdf	139 587	125 198	2020-03-09 11:54
01 Appendix LDA01.pdf	138 649	110 835	2020-03-10 12:20	03 Appendix ML03.pdf	56 741	39 441	2020-03-06 19:02
02 Appendix C02.pdf	97 434	89 258	2020-03-10 09:44	02 Appendix ML02.pdf	94 328	79 443	2020-03-06 19:02
01a Appendix C01a.pdf	53 252	45 279	2020-03-10 09:33	01a Appendix ML01a.pdf	41 214	31 787	2020-03-06 18:53
01 Appendix C01.pdf	116 979	101 301	2020-03-10 09:25	01 Appendix ML01.pdf	78 744	72 412	2020-03-06 18:51
04 Appendix S04.pdf	47 216	35 623	2020-03-09 16:11	04 Appendix MBDNC04...	34 106	27 719	2020-03-06 18:49
03 Appendix S03.pdf	77 902	65 040	2020-03-09 16:10	02 Appendix MBDNC02...	164 249	96 588	2020-03-06 18:46
02 Appendix NU02.pdf	143 307	132 159	2020-03-09 16:08	02 Appendix MA02.pdf	37 372	29 457	2020-03-06 18:36
07 Appendix Air07.pdf	56 891	40 136	2020-03-09 16:03	01 Appendix MA01.pdf	39 668	30 578	2020-03-06 18:34
01b Appendix ML01b.pdf	61 754	43 817	2020-03-09 15:58	03 Appendix LD3.pdf	51 339	36 692	2020-03-06 18:32
1e Appendix LD01e.pdf	51 166	37 579	2020-03-09 15:55	02 Appendix LD2.pdf	31 279	24 639	2020-03-06 18:30
01d Appendix LD01d.pdf	57 589	39 440	2020-03-09 15:54	01c Appendix LD01c.pdf	39 664	29 450	2020-03-06 18:23
03 Appendix LS03.pdf	151 469	138 811	2020-03-09 15:51	01b Appendix LD01b.pdf	40 452	29 681	2020-03-06 18:21
04 Appendix V04.pdf	159 381	142 316	2020-03-09 15:44	01a Appendix LD01a.pdf	39 161	30 158	2020-03-06 18:19
02 Appendix S02.pdf	36 718	27 646	2020-03-09 13:02	01a Appendix GS01a.pdf	34 954	28 235	2020-03-06 18:13
01 Appendix S01.pdf	39 316	30 064	2020-03-09 12:58	01 Appendix GS01.pdf	123 738	112 763	2020-03-06 18:10
02 Appendix MM02.pdf	82 101	67 256	2020-03-09 12:54	02 Appendix GS02.pdf	118 504	106 031	2020-03-06 18:06
01 Appendix MM01.pdf	48 954	40 606	2020-03-09 12:52	02 Appendix LS02.pdf	111 829	102 790	2020-03-06 17:49
02 Appendix M02.pdf	86 469	69 956	2020-03-09 12:50	01 Appendix LS01.pdf	53 695	45 492	2020-03-06 17:43
01 Appendix M01.pdf	62 217	51 464	2020-03-09 12:47	03 Appendix V03.pdf	48 667	38 731	2020-03-06 17:34
06 Appendix Air06.pdf	52 427	38 300	2020-03-09 12:30	02 Appendix V02.pdf	162 735	154 804	2020-03-06 17:30
05 Appendix Air05.pdf	40 672	28 751	2020-03-09 12:27	01 Appendix V01.pdf	62 052	52 803	2020-03-06 17:26
04 Appendix Air04.pdf	38 322	27 708	2020-03-09 12:25	01 Appendix T01.pdf	53 657	46 399	2020-03-06 17:15
03 Appendix Air03.pdf	67 635	57 961	2020-03-09 12:23				
01 Appendix NU01.pdf	42 091	33 945	2020-03-06 17:05				
03 Appendix MBDNC03....	133 949	117 912	2020-02-26 13:50				
01 Appendix MBDNC01....	246 706	209 801	2020-02-26 13:38				
01 Appendix LD01.pdf	125 043	114 724	2020-02-26 11:05				

Annex B

Index of attached documentation

Appendix Reference	Name of Farm
C01, C01a and C02	Complaints on various farms
GS01, GS01a and GS02	Grieg Seafoods
LD01, LD01a to e and LD02 to LD03	Loch Duart
MA01 to MA02	MOWI Ardgour
MBDNC01 to MBDNC04	MOWI BDNC
ML01, ML01a to b and ML02, ML02a and ML03	MOWI Lochailort
MCFF01 to MCFF02	MOWI MCFF
MNS01	MOWI North Shore
AIR01 to AIR07	Scottish Salmon Co-Aird
LDA01 to LDA05	Scottish Salmon Co-Loch Damp
M01 to M02	Scottish Salmon Co-Maay
MM01 to MM02	Scottish Salmon Co-Maragay
NU01 to NU02	Scottish Salmon Co-North Uiskevah
S01 to S04	Scottish Salmon Co-Scallaste
T01	Scottish Salmon Co-Torridon
V01 to V04	Scottish Salmon Co-Vacasay
LS01 to LS03	Scottish Sea Farms

The heavily redacted FOI disclosed inspection reports, letters and other documents such as this email dated 5 November 2019 (01 Appendix MNS01) in relation to a "possible fish welfare issue" at Mowi's North Shore salmon farm in Loch Erisort on the Isle of Lewis.

From: [REDACTED]
Sent: 05 November 2019 10:13
To: [REDACTED] <[\[REDACTED\]@apha.gov.uk](mailto:[REDACTED]@apha.gov.uk)>
Cc: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>; [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>; [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>; [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>; [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
Subject: Possible fish welfare issue at Mowi salmon farm

Hi [REDACTED]

Last Tuesday (29th October) I was carrying out an inspection with my colleague [REDACTED] at the Mowi salmon site North Shore (FS1033), following a report [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Can you please let me know if APHA wish to visit the North Shore site, either during the w/b 18/11/19 or earlier?

Many thanks

[REDACTED]
Marine Scotland – Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: [REDACTED]
S/B: [REDACTED]
e: [REDACTED] <[\[REDACTED\]@gov.scot](mailto:[REDACTED]@gov.scot)>
w: <http://www.gov.scot/Topics/marine>

APHA conducted a joint inspection with Marine Scotland of Mowi's North Shore salmon farm in Loch Erisort in November 2019.

From: [REDACTED]
Sent: 05 November 2019 15:16
To: SM-APHA-Scotland DTL Mailbox (APHA) [REDACTED]@apha.gov.uk>
Cc: [REDACTED]@apha.gov.uk>; SM-APHA-Scotland-Welfare (APHA) <[REDACTED]@apha.gov.uk>; [REDACTED]@apha.gov.uk>
Subject: FW: Possible fish welfare issue at Mowi salmon farm

Hi
Please find below for allocation – FHI suggested date wc 18/11 or before if possible
Please make sure case vet liaises with FHI direct to arrange asap

[REDACTED]

[REDACTED]
Field Delivery
APHA Field Services Scotland
(Perth)

Animal and Plant Health Agency (APHA)
Telephone: [REDACTED] | Direct line: [REDACTED] | Mobile: [REDACTED]
Email: [REDACTED]@apha.gov.uk
Website: www.gov.uk/apha | Twitter: [@APHAgovuk](https://twitter.com/APHAgovuk) | Facebook: [aphagov](https://www.facebook.com/aphagov)
Address: APHA Perth Field Services, Strathearn House, Broxden Business Park, Lamberkine Drive, Perth, PH1 1RX

From: [REDACTED]
Sent: 06 November 2019 09:48
To: [REDACTED]@apha.gov.uk>; [REDACTED]@apha.gov.uk>;
[REDACTED]@apha.gov.uk>
Cc: [REDACTED]@apha.gov.uk>
Subject: OFFICIAL SENSITIVE RE: Possible fish welfare issue at Mowi salmon farm

Dear All

I have spoken to the FHI inspector and I have given my availability for next week or following but in this instance my recommendation was that earlier, i.e., next week would be more appropriate for a joint inspection. FHI will contact me with dates etc.

Kind regards

[REDACTED]

Marine Scotland's Fish Health Inspectorate [recently published damning photos of an inspection of Mowi's North Shore salmon farm on the Isle of Lewis on 29 October 2019.](#)



A [letter from Marine Scotland to Mowi dated 13 December 2019](#) detailed a host of diseases, viruses and pathogens and noted that "all fish sampled displayed moderate to severe lice damage".

[REDACTED]
Mowi Scotland Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX
[REDACTED]

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS NO	FB0119	DATE OF VISIT	29/10/2019
SITE NO	FS1033	SITE NAME	North Shore
INSPECTOR	[REDACTED]	CASE NO	20190647

Section 1: Summary

An unannounced inspection was carried out at the above site following a report of increased mortality by the business. Five fish were removed for further examination and subsequent diagnostic sampling. All fish sampled displayed moderate to severe lice damage.



Read more via [Be Sure to Boycott RSPCA Assured Scottish Salmon - Shocking New Photos Published of Mowi's North Shore Feedlot in Loch Erisort!](#)

The Fish Health Inspectorate [reported \(17 January 2020\) disease and mortality problems at Mowi's North Shore salmon farm in Loch Erisort during an inspection with APHA on 12](#)

[November 2019](#) (sadly no samples or photos were taken unlike the October 2019 inspection visit):

Case No:	2019-0300	Date of visit:	12/11/2019			
Time spent on site:	9 hours	Main Inspector:				
Site No:	FS1033	Site Name:	North Shore			
Business No:	FB0119	Business Name:	Mowi Scotland Ltd			
Case Types:	1 WEL	2	3	4	5	6
Water Temp (°C):		Thermometer No:		FHI 045 completed		
Observations:	Region:	WI	Water type:	S	CoGP MA	W-3
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.				
Clinical signs of disease observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.				

Additional Case Information:

Follow-up visit with inspector from APHA after concerns about welfare raised during case 2019-0647.

Disease issues - PD, Anaemia, Yersinia ruckeri, one case of CMS and recently algal bloom AGD.

pen two and four have the highest levels of mortalities, suffering from gill issues and treatment losses.

Lumpfish mortalities- 72% (115,314) lumpfish mortalities over the cycle across the site. This has been caused by mechanical and freshwater treatments, as well as disease issues. Health specialists had been on site in October and prescribed an in-feed florfenicol treatment and mortalities dropped. All other mortalities explained/action taken.

The heavily redacted FOI documents disclosed by APHA in March 2020 also included a 'Fish Farm Welfare Inspection Report' (07 Appendix Air07) in relation to The Scottish Salmon Company's salmon farm at Aird in Loch Shieldaig.



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS0594	2. Date of Visit	13/06/2019
3. Name and address	Scottish Salmon Company-Aird Farm Site Aird Sheildaig Strathcarron Postcode		

The 'Official-Sensitive' document detailed an inspection on 13 June 2019 (following a [formal complaint filed on 11 June 2019 by Scottish Salmon Watch](#) including [shocking video footage](#) broadcast by [STV News](#) and published by [The Ferret](#)) which appears to have reported non-compliance and "unnecessary suffering" although it was so heavily redacted it is impossible to decipher.

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	SALMON	LUMPFISH						
Staffing STF	[REDACTED]	[REDACTED]						
Inspection INS	[REDACTED]	[REDACTED]						[REDACTED]
Disease treatment DIS	[REDACTED]	[REDACTED]						
Records REC	[REDACTED]	[REDACTED]						
Housing HOU	[REDACTED]	[REDACTED]						
Environment ENV	[REDACTED]	[REDACTED]						
Equipment EQP	[REDACTED]	[REDACTED]						
Freedom of Movement	[REDACTED]	[REDACTED]						
Feed FDW	[REDACTED]	[REDACTED]						
Mutilations MUT	[REDACTED]	[REDACTED]						
Breeding Procedures BRE	[REDACTED]	[REDACTED]						
Compliant or non-compliant	[REDACTED]	[REDACTED]						

14. Action [REDACTED]

15. Further action [REDACTED]

16. Date unnecessary suffering resolved (if applicable) [REDACTED] How was unnecessary suffering resolved? [REDACTED]

17. Assurance Schemes [REDACTED]

Inspectors Signature [REDACTED] Date 20/06/2019

Name in BLOCK LETTERS [REDACTED] Grade [REDACTED]

APHA office Longman House 28 Longman Road IV1 1SF M/F Mark forward for 'non-compliance' [REDACTED]

Inverness

Non-compliance assessment

High	Medium	Low
■	■	■

Summary information detailing farming type and overall management together with the reason for visit, summary of findings, description of decisions and actions taken with reasons

Detail letters sent, notices served and other action regarding any identified non compliances

Give mark forward date with justification

Use additional pages if necessary to record findings.

Manuscript/Report and additional comments

Welfare allegation made by [REDACTED]
[REDACTED].
It would appear from the complaint that it was also directed to Marine Scotland and Police Scotland Wildlife Crime Unit.
APHA, Marine Scotland and the Police Scotland Wildlife Crime Unit received a welfare complaint from [REDACTED] (11 June 2019).
[REDACTED]
This visit was led by [REDACTED] Fish Health Inspector [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



WF152 (Rev. 05/18)

OFFICIAL-SENSITIVE

A 'Report on Fish Welfare for Scottish Government' (05 Appendix Air05) detailing APHA's visit on 13 June 2019 was once again heavily redacted and concluded in the 'Overall Assessment' that the salmon farm was "Compliant".

Scottish Government

Appendix Air05



Animal Health & Welfare Act (Scotland) 2006

Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number

FS0594

2. Name and address

Scottish Salmon Company-Aird Farm Site
Aird
Sheildaig
Strathcarron

Postcode IV54 8XH

[REDACTED]

10. Action

(outline any necessary actions)

Joint follow-up visit with FHI.

11. Conclusions and recommendations

WF151 (Rev. 05/18)

OFFICIAL-SENSITIVE

Joint follow-up visit with Fish Health Inspectors to the site is currently being planned.

12. Overall Assessment: Compliant

** delete as appropriate*

Here's what APHA's definition of compliance with the [Animal Health & Welfare \(Scotland\) Act 2006](#) looks like (video footage and photos taken by Scottish Salmon Watch on 8 June 2019).



Search in Drive

New

My Drive > Loch Shieldaig filming 8 June 2019

My Drive

- Shared with me
- Recent
- Starred
- Trash

Storage

33.2 GB of 100 GB used

[Buy storage](#)

Files



Photo #1 a



Photo #1.jpg



Photo #2.jpg



Photo #3.jpg



Photo #4.jpg



Photo #7.jpg



Photo #8.jpg



Photo #9.jpg



Photo #10.jpg



Photo #11.jpg



Photo #14.jpg



Photo #15.jpg



Photo #16.jpg



Photo #17.jpg



Video 8 June 2019.mp4



WATCH LIVE



Read more via ["STV News on Scottish Salmon's Welfare Nightmare - watch online now!"](#)
and [The Ferret: "'Sick' salmon film prompts government probe into Scottish fish farm"](#)

A letter from APHA to The Scottish Salmon Company in July 2019 (02 Appendix Air02) redacted the 'findings' of the Loch Shildaig inspections but seems to have given the all clear.

Appendix Air02



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Field Services Inverness
Longman House,
28 Longman Road,
Inverness
IV1 1SF

[REDACTED]
apha.scotland@apha.gsi.gov.uk
www.gov.uk/apha

[REDACTED]
The Scottish Salmon Company
John Murray Building
Scottish Marine Institute, Oban
Scotland
PA37 1QA

19 July 2019

Dear [REDACTED]

Animal Health and Welfare (Scotland) Act 2006
Animal Welfare Act 2006

Thank you for your time and cooperation during my visit.

I visited on 16th July 2019 (the inspection was a follow up visit triggered by a previous welfare complaint received by APHA and Marine Scotland) to inspect your farmed fish kept at Aird Farm (Sheildaig). I accompanied [REDACTED] Senior Fish Inspector, Marine Scotland.

FINDINGS

[REDACTED]

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]

APHA

cc [REDACTED] APHA
cc [REDACTED] APHA
cc [REDACTED] Marine Scotland

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

OFFICIAL-SENSITIVE

This letter followed a previous letter sent by APHA to The Scottish Salmon Company in June 2019 (01 Appendix Air01) which detailed more 'findings' but was again redacted making it impossible to find out what APHA actually found.



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Field Services Inverness
Longman House,
28 Longman Road,
Inverness
IV1 1SF



apha.scotland@apha.gsi.gov.uk
www.gov.uk/apha



The Scottish Salmon Company
John Murray Building
Scottish Marine Institute, Oban
Scotland
PA37 1QA

20 June 2019

Dear

Animal Health and Welfare (Scotland) Act 2006
Animal Welfare Act 2006

Thank you for your time and cooperation during my visit.

I visited on 13th June 2019 (the inspection was triggered by a welfare complaint received by APHA and Marine Scotland) to inspect your farmed fish kept at Aird Farm (Sheildaig). I accompanied , Senior Fish Inspector, Marine Scotland.

FINDINGS



APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

OFFICIAL-SENSITIVE

[REDACTED]

ACTIONS

[REDACTED]

[REDACTED]

[REDACTED]

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

[REDACTED]

APHA [REDACTED]

cc [REDACTED], APHA
cc [REDACTED], APHA
cc [REDACTED], Scottish Salmon Company
cc [REDACTED], Marine Scotland

An inspection report [published by Marine Scotland's Fish Health Inspectorate in August 2019](#) detailing the visit with APHA on 13 June 2019 paints a less savoury picture of blind and moribund fish ridden with lesions and boils.

Case No:	2019-0271	Date of visit:	13/06/2019
Time spent on site:	6 hours	Main Inspector:	[REDACTED]
Site No:	FS0594	Site Name:	Aird
Business No:	FB0169	Business Name:	The Scottish Salmon Company
Case Types:	1 REP	2 DIA	3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED]
Water Temp (°C):	10	Thermometer No:	T146
		FHI 045 completed	N/A
Observations:	Region: HI	Water type: S	CoGP MA M-17
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Clinical signs of disease observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Gross pathology observed?	<input checked="" type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Diagnostic samples taken?	<input checked="" type="checkbox"/>		

Additional Case Information:

[REDACTED] (TSSC vet), [REDACTED] (TSSC), [REDACTED] (TSSC biologist), [REDACTED] (TSSC senior biologist) and [REDACTED] (APHA vet)
Visit conducted following report from Scottish Salmon Watch in relation to welfare issues on site.

Site inspection, optilicer (Volt Processor) at cage pumping both salmon and lumpfish. Any damaged fish were being removed and dispatched in a harvest bin with an overdose of anaesthetic. On site inspection approximately 10-15 blind, rubbed and moribund were observed at the cage edges. In about three cages this number was about 15-30 fish. Many of these fish were removed during the inspection and killed with an overdoes of anaesthetic. 5 of these fish were sampled for diagnostic examination. Fish were also viewed with the under water cameras on the barge. No moribund or blind fish were observed on the underwater cameras. APHA have advised the Scottish Salmon Company to remove all affected fish immediately and will be recommending that the company reviews its procedures to ensure that enough staff time is dedicated to inspecting cages and removing moribund fish, particularly during periods where there are increased poor doing fish on site. A follow up inspection will be scheduled to check that the recommendation has been complied with.

Case no: Site No: Method of killing:
 Date of visit: Inspector(s): Sheet Relevant:

S for strong presence: M for medium presence: W for weak presence

Fish Number		1	2	3	4	5				
Time sampled after death (if > 45 minutes)		1-2 hot	1-2 hot	1-2 hot	1-2 hot	1-2 hours				
External Signs										
Behaviour	Moribund	S	S	S	S	S				
	Lethargic	S	S	S	S	S				
Eyes										
	Exophthalmic									
	Enophthalmic (sunken)									
	Cataract									
	Haemorrhagic	S		S	S	S				
Gills										
	Pale									
	Zoned									
	Necrotic									
Lesions										
	Flank	S		S	S					

Additional comments:
 All fish sampled were blind. Fish 3 "boil" on flank, Fish 4 enlarged gall bladder.

Section 2: Case Detail

Observations

Following a report received by the inspectorate of welfare issues at Aird an inspection was arranged with a veterinarian from the Animal and Plant Health Agency. On inspection of the pens approximately 10-15 blind, rubbed and moribund fish were observed at the surface of each pen. This number increased to approximately 15-30 in three of the pens. During the inspection many of these fish were removed and dispatched with an overdose of aesthetic. While we were on site a boat was present treating the fish. During this procedure any damaged fish were removed and

R09
 Marine Laboratory, 375 Victoria Road, Aberdeen, AB11 9DB
 Tel - 0131 244 3498 Fax - 0131 244 0944 Email - ms.fishhealth@gov.scot
 Website - www.gov.scot/Topics/marine/science

dispatched in a harvest bin with an overdose of anaesthetic. Five fish removed directly from the pens were retained for diagnostic examination.

All five fish sampled were moribund, lethargic and blind. Externally four had haemorrhaged eyes and three had flank lesions including a "boil" like lesion on fish three. Internally fish three and four had enlarged livers and fish four had an enlarged gall bladder.

Read more via "[Mmmm Blind Scottish Salmon with Boils, Anyone?](#)"



Another 'Fish Welfare Inspection Report' (01b Appendix ML01b) relating to an inspection visit in April 2019 to Mowi's Lochailort Recirculation Unit (accredited via RSPCA Assured) appeared to report non-compliances but was so heavily redacted it was impossible to decipher.

Scottish Government

Appendix ML01b



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details

(Refer to Guidance Notes (WF153))

1. Reference number	FS1269	2. Date of Visit	12/04/19
3. Name and address	MOWI (Formerly Marine Harvest Scotland) Lochailort Recirculation Unit Lochailort Inverness Shire Postcode PH38 4LZ		

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	Alevins	Fry	Smolts					
Staffing STF								
Inspection INS								
Disease treatment DIS								
Records REC								
Housing HOU								
Environment ENV								
Equipment EQP								
Freedom of Movement								
Feed FDW								
Mutilations MUT								
Breeding Procedures BRE								
Compliant or non-compliant								

14. Action

[Redacted]

15. Further action

[Redacted]

16. Date unnecessary suffering resolved (if applicable)

<input type="checkbox"/>	How was unnecessary suffering resolved?	<input type="checkbox"/>
--------------------------	---	--------------------------

17. Assurance Schemes

RSPCA assurance scheme.

Inspectors Signature	<input type="text"/>	Date	7/5/19
Name in BLOCK LETTERS	<input type="text"/>	Grade	<input type="text"/>
APHA office	APHA Perth Strathearn House Broxden Business Park Lamberkine Drive	M/F	Mark forward for 'non-compliance'

Perth PH1 1RX

Non-compliance
assessment

High	Medium	Low
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Summary information detailing farming type and overall management together with the reason for visit, summary of findings, description of decisions and actions taken with reasons

Detail letters sent, notices served and other action regarding any identified non compliances

Give mark forward date with justification

Use additional pages if necessary to record findings.

Manuscript/Report and additional comments

<p>[Redacted]</p> <p>[Redacted]</p>
<p>[Redacted]</p> <p>[Redacted]</p>
<p>[Redacted]</p> <p>[Redacted]</p>
<p>[Redacted]</p> <p>[Redacted]</p>



An 'Initial Fish Welfare Incident Record Form' (03 Appendix ML03) suggests that APHA's inspection in April 2019 was triggered by a complaint filed on 27 March 2019.

Initial Welfare Incident Record Form

For use by all staff who receive a complaint/referral/intelligence about animal welfare from any source

Report taken by: [REDACTED]	Complaint <input type="checkbox"/> Referral <input checked="" type="checkbox"/>
Origin: Other Third Party	Received Date: 27/03/2019 Time: 16:17
Name and Address of Premises: MOWI (formerly Marine Harvest Scotland) Lochailort Recirculation Unit Lochailort Inverness Shire Postcode PH38 4LZ	Sam WS ID: [REDACTED]
	CPH No: [REDACTED]
	Third Party Ref No: [REDACTED]
	Map Reference: NM7670081800
	Telephone Number: [REDACTED]

Location of animals if different from above

[REDACTED]

Nature of Complaint or other information

[REDACTED]

The name of the informant who alleged "actual suffering" at Mowi's Lochailort Recirculation Unit was redacted in the document marked 'Official-Sensitive'.

Name of Informant	[REDACTED]
Address of informant	[REDACTED]
Postcode	[REDACTED]
Telephone Number	[REDACTED]
Does the allegation indicate actual suffering in animals?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Name of Veterinary Officer (VO) carrying out Veterinary Risk Assessment (VRA)	[REDACTED]
Date of VRA	28/03/2019
Time of VRA	10:00
VRA: Priority of visit:	High 1 <input type="checkbox"/> Medium 3 <input checked="" type="checkbox"/> Low 4 <input type="checkbox"/> Other N/A Please Select...
(Where VRA indicates High Risk complaint visits must be carried out within 24 hours)	
Required/suggested timescale for visit:	5-7 business days

Note that the [Scottish Government's Fish Health Inspection Agency reported](#) over 1.5 million mortalities at Mowi's Lochailort Recirculation Hatchery in late March 2019 representing 50% mortality with a further 89,737 mortalities in February 2019:

Reporting Business Name	Site Name	Date reported	Mortality rate recorded (%)	Explained/unexplained	Explained reasons	Total mortality during event	Additional information
Mowi Scotland Ltd	Lochailort Recirculation Hatchery	05/02/2019	1.73	Explained	Water supply failure	89737	Accident due to new staff in training. Training continuing to reduce risk in future.
Mowi Scotland Ltd	Lochailort Recirculation Hatchery	23/03/2019	50	Explained	Human error	1521479	All alevins in one of the hatcheries lost (2019 Q4 generation). Human error resulting in recirculation pump stopping. Other stocks on site unaffected (2019 Q3 parr and another batch of 1.5 million 2019 Q4 alevins in separate hatchery). Percentage loss across the whole site for w/b 18/3/19 is 28.54%, but 49.81% in Q4 generation

Action taken by FHI

Fish were due to be culled. Mortality event lasted 1 week. No further action. Alevins also on site at the time. So whole site mortality not above the reporting threshold.

APHA intend to inspect site and an FHI will attend. Inspection took place on 12/04/2019. FHI case 2019-0183.

A 'Report on Fish Welfare for Scottish Government' (01a Appendix ML01a) provided more details of the complaint to the Fish Health Inspectorate and the inspection 'findings' but the document is heavily redacted.

Scottish Government

Animal Health & Welfare Act (Scotland) 2006

Appendix ML01a



Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number

FS1269

2. Name and address

MOWI (Formerly Marine Harvest Scotland)
Lochailort Recirculation Unit
Lochailort
Inverness Shire

Postcode PH38 4LZ

Part 2: Detail

6. Present at visit:

(List the names and roles of attendees at the visit)

[REDACTED], APHA)
(Fish health Inspectorate)
(Site manager)

7. Reason for Visit:

(state specific reason for visit i.e. routine visit, complaint etc. If a complaint include by whom)

This visit was raised following a discussion with Fish Health Inspectorate who were notified [REDACTED]

8. Background

(include nature of site (sea/freshwater), species, number, production aim, production cycle, source, history of unit, any recent changes, transport used, veterinary and other advisers).

[REDACTED]

[REDACTED]

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

[Redacted text block]

WF151 (Rev. 05/18)

OFFICIAL-SENSITIVE

[Redacted text block]

The heavily redacted report dated May 2019 detailed the overall assessment as 'Compliant'.

10. Action

(outline any necessary actions)

[Redacted content]

11. Conclusions and recommendations

[Redacted content]

12. Overall Assessment: Compliant

Signature	<input type="text"/>	APHA office address APHA Perth Strathearn House Broxden Business Park Lamberkine Drive Perth PH1 1RX
Name in BLOCK LETTERS	<input type="text"/>	
Date	7/5/19	
Tel No.	<input type="text"/>	

DATA PROTECTION
For information on how we handle personal data please go to www.gov.uk and search Animal and Plant Health Agency Personal Information Charter.

An 'OFFICIAL SENSITIVE' email in June 2019 (02 Appendix ML02) attached a report on APHA's visit to Mowi's Lochailort's Hatchery.



From: [Redacted]
Sent: 17 June 2019 09:59
To: [Redacted]@gov.scot
Subject: OFFICIAL SENSITIVE WF151 - Lochailort 79.452.8003 final


 [Redacted]
 Dear [Redacted]
 Please find enclosed Report for visit to a Fish Hatchery [Redacted]
 Kind regards,
 [Redacted]

Another 'Fish Welfare Inspection Report' (1e Appendix LD01e) relating to an inspection visit in February 2019 to Loch Duart's salmon farm in Loch Laxford (accredited via RSPCA Assured) appeared to report "unnecessary suffering" but was so heavily redacted it was impossible to decipher.

Appendix LD01e

Scottish Government



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS0065	2. Date of Visit	20/02/19
3. Name and address	Loch Duart Ltd Badcoll Scourie Sutherland Postcode IV27 4TH		
4. Location of Fish (if different from above)	Loch Laxford Site		

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Farmed Fish (Salmon)	██████	██████	█	██████
Farmed fish (Ballan Wrasse)	██	██	█	██████

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	Farmed Salmon	Ballan Wrasse						
Staffing STF	██████	██████						
Inspection INS	██████	██████						
Disease treatment DIS	██████	██████						
Records REC	██████	██████						
Housing HOU	██████	██████						
Environment ENV	██████	██████						
Equipment EQP	██████	██████						
Freedom of Movement	██████	██████						
Feed FDW	██████	██████						
Mutilations MUT	██████	██████						
Breeding Procedures BRE	██████	██████						
Compliant or non-compliant	██████	██████						

14. Action

██████	
--------	--

15. Further action

██████	
--------	--

A heavily redacted 'Report on Fish Welfare for Scottish Government' (01c Appendix LD01c) provided more details and concluded that Loch Duart's salmon farm in Loch Laxford was 'Compliant'.

Appendix LD01c

Scottish Government

Animal Health & Welfare Act (Scotland) 2006



Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number	FS0065
2. Name and address	Loch Duart Ltd Badcoll Scourie Sutherland Postcode IV27 4TH
3. Location of Fish (if different from above)	Loch Laxford

4. Date of Visit | 20/02/19 |

5. Time of visit | 12:30 - 14:00 |

Part 2: Detail

6. Present at visit:

(List the names and roles of attendees at the visit)

[REDACTED] Veterinary Advisor, APHA) [REDACTED] (Fish Health Inspector), [REDACTED]
[REDACTED] for Loch Duart).

7. Reason for Visit:

(state specific reason for visit i.e. routine visit, complaint etc. If a complaint include by whom)

Visit was raised due to a welfare complaint [REDACTED]
[REDACTED]
[REDACTED]

8. Background

(include nature of site (sea/freshwater), species, number, production aim, production cycle, source, history of unit, any recent changes, transport used, veterinary and other advisers).

Welfare complaint received on the 23/01/19 [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

A joint inspection was carried out on the 20th February 2019 with FHI [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. Action

(outline any necessary actions)

No action required.

11. Conclusions and recommendations

[Redacted]

12. Overall Assessment: Compliant

Signature	[Redacted]
Name in BLOCK LETTERS	[Redacted]
Date	11/3/19
Tel No.	[Redacted]

APHA office address
APHA Perth
Stratheam House
Broxden Business Park
Lamberkine Drive
Perth
PH1 1RX

Another 'Fish Welfare Inspection Report' (01d Appendix LD01d) relating to an inspection visit in February 2019 to Loch Duart's Duartmore Hatchery (accredited via RSPCA Assured) may have reported non-compliances and "unnecessary suffering" but was so heavily redacted it was impossible to decipher.



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS0062	2. Date of Visit	20/02/19
3. Name and address	Loch Duart Badcall Salmon House Scourie Lairg Sutherland Postcode IV27 4TH		
4. Location of Fish (if different from above)	Duartmore Hatchery		

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Duartmore Indoor Hatchery	██████████	████	█	██████████
Duartmore Tanks	██████████	████	█	██████████

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	eggs	fish						
Staffing STF	██████	██████						██████
Inspection INS	██████	██████						██████
Disease treatment DIS	██████	██████						██████
Records REC	██████	██████						██████
Housing HOU	██████	██████						██████
Environment ENV	██████	██████						██████
Equipment EQP	██████	██████						██████
Freedom of Movement	██████	██████						██████
Feed FDW	██████	██████						██████
Mutilations MUT	██████	██████						██████
Breeding Procedures BRE	██████	██████						██████
Compliant or non-compliant	██████	██████						██████

14. Action ████████████████████

15. Further action ████████████████████

16. Date unnecessary suffering resolved (if applicable) ██ How was unnecessary suffering resolved? ██

17. Assurance Schemes RSPCA Assurance Scheme,

Inspectors Signature ████████████████████ Date 26/02/19

Name in BLOCK LETTERS ████████████████████ Grade ██

APHA office APHA Perth
Strathearn House
Broxden Business Park
Lamberkine Drive
Perth
PH1 1RX M/F Mark forward for 'non-compliance'

Non-compliance High Medium Low

assessment

■	■	■

Summary information detailing farming type and overall management together with the reason for visit, summary of findings, description of decisions and actions taken with reasons

Detail letters sent, notices served and other action regarding any identified non compliances

Give mark forward date with justification

Use additional pages if necessary to record findings.

Manuscript/Report and additional comments

This visit was raised due to a welfare complaint

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A 'Report on Fish Welfare for Scottish Government' (01b Appendix LD01b) provided more details and concluded that Loch Duart's RSPCA Assured Duartmore Hatchery was 'Compliant'.

Scottish Government

Animal Health & Welfare Act (Scotland) 2006



Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number	FS0062
2. Name and address	Loch Duart Badcall Salmon House Scourie Lairg Sutherland Postcode IV27 4TH
3. Location of Fish (if different from above)	Duartmore Hatchery site
4. Date of Visit	20/02/19
5. Time of visit	09:30 - 14:00

Part 2: Detail

6. Present at visit:

(List the names and roles of attendees at the visit)

[REDACTED] (Veterinary Advisor, APHA), [REDACTED] (Fish Health Inspector), [REDACTED] [REDACTED] Loch Duart), [REDACTED] Hatchery Manager
--

7. Reason for Visit:

(state specific reason for visit i.e. routine visit, complaint etc. If a complaint include by whom)

Visit was raised due to a welfare complaint received from [REDACTED] [REDACTED] [REDACTED] [REDACTED]
--

8. Background

(include nature of site (sea/freshwater), species, number, production aim, production cycle, source, history of unit, any recent changes, transport used, veterinary and other advisers).

Duartmore hatchery site is split over two sites; Duartmore North and Duartmore South. [REDACTED] [REDACTED] [REDACTED]

[REDACTED]

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

[REDACTED]

10. Action

WF151 (Rev. 05/18)

OFFICIAL-SENSITIVE

(outline any necessary actions)

[REDACTED]

11. Conclusions and recommendations

[REDACTED]

12. Overall Assessment: Compliant

** delete as appropriate*

Signature	[REDACTED]
Name in BLOCK LETTERS	[REDACTED]
Date	04/03/19
Tel No.	[REDACTED]

APHA office address APHA Perth Strathearn House Broxden Business Park Lamberkine Drive PH1 1RX

APHA's visit to Loch Duart appears to have been triggered by a phone call from a complainant - as detailed via an 'Initial Welfare Incident Record Form' dated 23 January 2019 (01a Appendix LD01a) which stated that the time-scale of a visit was "dependent upon availability of Fish Inspection officer and weather conditions".

Department of the Environment, Food and Rural Affairs
 Scottish Government
 Welsh Government



Initial Welfare Incident Record Form

For use by all staff who receive a complaint/referral/intelligence about animal welfare from any source

Report taken by: <input type="text"/>	Complaint <input checked="" type="checkbox"/> Referral <input type="checkbox"/>
Origin: <input type="text" value="Informant"/>	Received Date: <input type="text" value="23/01/19"/> Time: <input type="text" value="17:10"/>
Name and Address of Premises: Loch Duart Ltd Badcall Salmon House Scourie Sutherland Scotland	Sam WS ID: <input type="text"/>
Postcode IV2 4TH	CPH No: <input type="text"/>
	Third Party Ref No: <input type="text"/>
	Map Reference: <input type="text"/>
	Telephone Number: <input type="text"/>

Location of animals if different from above

Nature of Complaint or other information

Call received by

Welfare Category	Farm	<input checked="" type="checkbox"/>	Market	Source		Slaughter	Location		Transport	<input type="checkbox"/>	
				Market	<input type="checkbox"/>		Farm	<input type="checkbox"/>			
				Farm	<input type="checkbox"/>		Other	<input type="checkbox"/>			
Name of Informant	<input type="text"/>										
Address of informant	<input type="text"/>										
	Postcode									Telephone Number	<input type="text"/>

Does the allegation indicate actual suffering in animals? Yes No

Name of Veterinary Officer (VO) carrying out Veterinary Risk Assessment (VRA)

Date of VRA Time of VRA

VRA: Priority of visit: High 1 Medium 3 Low 4 Other N/A Please Select...

(Where VRA indicates High Risk complaint visits must be carried out within 24 hours)

Required/suggested timescale for visit:

An email from APHA in March 2019 (01 Appendix LD01) attached fish welfare reports for the visits carried out at Loch Duart.

From: [REDACTED]
Sent: 21 March 2019 14:51
To: SM-Defra-Scotland-Welfare (APHA) [REDACTED] >
Subject: Official Sensitive: Fish welfare reports



Good afternoon,

Please find attached the fish welfare reports for the visits carried out at Loch Duart. (Two sites)

If you need any more information then please let me know.

Many thanks

[REDACTED]

[REDACTED]

APHA Perth Field Services

[Scottish Salmon Watch's FOI review request to APHA will hopefully access these reports and other documents deemed commercially sensitive]

A 'Fish Farm Welfare Inspection Report' detailed another visit to Loch Duart's RSPCA Assured Duartmore Hatchery in October 2017 (03 Appendix LD3).

Scottish Government



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS0062	2. Date of Visit	25/10/2017
3. Name and address	Loch Duart Ltd Badcoll Scourie Sutherland Postcode IV27 4TH		
4. Location of Fish (if different from above)	Duartmore Hatchery Duartmore Bridge Scourie Postcode IV27 4TJ		

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	fish							
Staffing STF	██████							██████
Inspection INS	██████							██████
Disease treatment DIS	██████							██████
Records REC	██████							██████
Housing HOU	██████							██████
Environment ENV	██████							██████
Equipment EQP	██████							██████
Freedom of Movement	██████							██████
Feed FDW	██████							██████
Mutilations MUT	██████							██████
Breeding Procedures BRE								
Compliant or non-compliant	██████							██████

14. Action ██████

15. Further action ██████

16. Date unnecessary suffering resolved (if applicable) ██████ How was unnecessary suffering resolved? ██████

17. Assurance Schemes RSPCA Assurance Scheme (formerly Freedom Foods); Label Rouge (French schemem)



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS1091	2. Date of Visit	05/09/2018
3. Name and address	Scottish Salmon Company, Vacasay site Breascleit Pier Breascleit Isle of Lewis Postcode HS2 9DY		
4. Location of Fish (if different from above)	Vacasay		

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	OT1	OT2						
Staffing STF	■	■						■
Inspection INS	■	■						■
Disease treatment DIS	■	■						■
Records REC	■	■						■
Housing HOU	■	■						■
Environment ENV	■	■						■
Equipment EQP	■	■						■
Freedom of Movement	■	■						■
Feed FDW	■	■						■
Mutilations MUT	■	■						■
Breeding Procedures BRE								
Compliant or non-compliant								

14. Action	Welfare complaint received on 30/08/18 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
------------	---

15. Further action	[REDACTED]
--------------------	------------

[REDACTED]

[REDACTED]

[Redacted]

Welfare Category	Farm	<input checked="" type="checkbox"/>	Market	Source		Slaughter	Location		Transport	<input type="checkbox"/>
				Market	<input type="checkbox"/>		Farm	<input type="checkbox"/>		

Name of Informant [Redacted]

Address of informant [Redacted]

Postcode [Redacted] Telephone Number [Redacted]

Does the allegation indicate actual suffering in animals? Yes No

Name of Veterinary Officer (VO) carrying out Veterinary Risk Assessment (VRA) [Redacted]

Date of VRA 30/08/2018 Time of VRA ~14:35

VRA: Priority of visit: High 1 Medium 3 Low 4 Other N/A Please Select...

(Where VRA indicates High Risk complaint visits must be carried out within 24 hours)

Required/suggested timescale for visit: 5 working days

Action

A letter from APHA to The Scottish Salmon Company dated 5 September 2018 (02 Appendix V02) detailed findings and "advised actions".

[Redacted]

[Redacted]

The Animal and Plant Health Agency is an Executive Agency of the Department for Environment, Food and Rural Affairs working to safeguard animal and plant health for the benefit of people, the environment and the economy.

WF78 (Rev. 12/14)



[Redacted]

[Redacted]

Thank you for your time and cooperation and if you have any queries please do not hesitate to contact me at the above address or [Redacted] FHI.

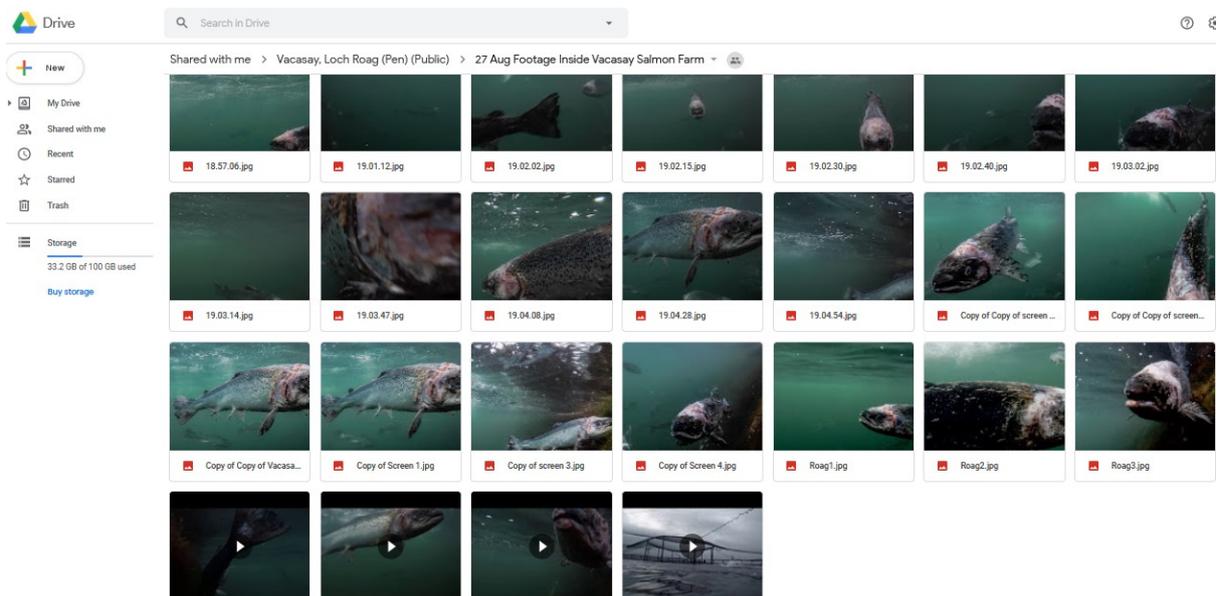
Yours sincerely,

[Redacted], Animal & Plant Health Agency
CC: [Redacted] FHI

Read more about this shocking welfare case via [‘An Autopsy Of An All Clear’](#).



Video footage and photos of welfare abuse at The Scottish Salmon Company's Vacasay salmon farm in August 2018 (broadcast by the [BBC One Show](#), [BBC Landward](#) and [BBC Panorama](#)) is publicly available via [Corin Smith's Google Drive](#).



Read more via:

[Official inspections of lice-ridden salmon farm slammed as 'whitewash'](#)

[Fish farm censured after film exposed lice-ridden salmon](#)

[SSPCA under fire over lice-infested salmon filmed at fish farm](#)

[Daily Mail: "Suffering Salmon: Watchdog investigates farm over claims that more than 300,000 fish are infested with lice"](#)

[Scottish Salmon Farming Horror - Mass Graves Uncovered](#)

[Sick salmon at Scottish fish farm revealed on film](#)

Another 'Fish Welfare Inspection Report' (02 Appendix MM02) relating to an inspection visit in June 2019 to The Scottish Salmon Company's salmon farm at Maragay Mor in North Uist may have reported non-compliances but was so heavily redacted it was impossible to decipher.

Scottish Government

Appendix MM02



Animal &
Plant Health
Agency

	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS1304	2. Date of Visit	27/06/2019
3. Name and address	The Scottish Salmon Company (Maragay Mor) Killin Shorebase Grimsay North Uist HS6 5HY Postcode		

11 & 12. List enterprises which were inspected at this visit and record details of any non-compliance in the appropriate section overleaf.

Enterprise Type	No of fish present	No of fish inspected	No of fish on which action was taken	Overall assessment for enterprise (compliant or non-compliant)
Atlantic Salmon	██████	██████	██	██████
Lumpsucker	██████	██████	██	██████



	Initial	Date
Assessment		
US resolved		
Further Action		

Fish Farm Welfare Inspection Report

General details (Refer to Guidance Notes (WF153))

1. Reference number	FS1315	2. Date of Visit	27/06/2019
3. Name and address	The Scottish Salmon Company (Maaey site) Killin Shorebase Grimsay North Uist HS6 5HY Postcode		

13. Welfare Compliance Levels:

- Record further information including details of any non compliant enterprise
- Record the enterprise code and whether compliant or non-compliant for each enterprise for each issue

Record overall compliance or non-compliance score for each issue

Enterprise Codes	Salmo Salar	Lumpsucker						
Staffing STF	██████	██████						██████
Inspection INS	██████	██████						██████
Disease treatment DIS	██████	██████						██████
Records REC	██████	██████						██████
Housing HOU	██████	██████						██████
Environment ENV	██████	██████						██████
Equipment EQP	██████	██████						██████
Freedom of Movement	██████	██████						██████
Feed FDW	██████	██████						██████
Mutilations MUT	█	█						█
Breeding Procedures BRE	█	█						█
Compliant or non-compliant	██████	██████						██████

14. Action

15. Further action

[REDACTED]

Whether APHA officially reported breaches of welfare laws or not, it is painfully clear that the farmed salmon at The Scottish Salmon Company's Maragay Mor and Maaey salmon farms were suffering from welfare abuse. Here's damning [photos published by the Scottish Government's Fish Health Inspectorate](#) detailing disease and welfare problems at the sites on 27 June 2019 (the same day as the APHA inspection).





Read more via "[Maey Day for The Scottish Salmon Company](#)" and "[Photo Dossier of Diseased, Deformed & Abused Scottish Salmon](#)"

A redacted letter from APHA to The Scottish Salmon Company in September 2019 (01 Appendix MM01) was so heavily redacted to render it useless (hence Scottish Salmon Watch's review request to APHA filed today).



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Field Services Inverness
Longman House,
28 Longman Road,
Inverness
IV1 1SF

[REDACTED]
apha.scotland@apha.gsi.gov.uk
www.gov.uk/apha

[REDACTED]
The Scottish Salmon Company
John Murray Building
Scottish Marine Institute, Oban
Scotland
PA37 1QA

06th September 2019

Dear [REDACTED]

Animal Health and Welfare (Scotland) Act 2006
Animal Welfare Act 2006

Thank you for your time and cooperation.

I visited on 27th June 2019 (the inspection was triggered by a welfare complaint received by APHA and Marine Scotland) to inspect your farmed fish kept at Maeey and Maragay Mor Farm. I accompanied [REDACTED] Fish Inspector, Marine Scotland.

FINDINGS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

OFFICIAL-SENSITIVE

[REDACTED]

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

[REDACTED]

APHA [REDACTED]

cc [REDACTED], APHA
cc [REDACTED] Scottish Salmon Company
cc [REDACTED], Marine Scotland

A 'Report on Fish Welfare for Scottish Government' (01 Appendix M01) is heavily redacted but concludes that The Scottish Salmon Company's Maey salmon farm was "compliant" with the Animal Health & Welfare (Scotland) Act.



Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number	FS1315
2. Name and address	The Scottish Salmon Company (Maaey site) Killin Shorebase Grimsay North Uist HS6 5HY Postcode

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

[Redacted content]

10. Action

(outline any necessary actions)

[Redacted]

11. Conclusions and recommendations

[Redacted]

12. Overall Assessment: Compliant*

** delete as appropriate*

Other redacted emails included this PDF (04 Appendix LDA04) in relation to Loch Duart:

From: [Redacted]
Sent: 04 October 2019 13:06
To: [Redacted] <[\[Redacted\]@apha.gov.uk](mailto:[Redacted]@apha.gov.uk)>; [Redacted] <[\[Redacted\]@apha.gov.uk](mailto:[Redacted]@apha.gov.uk)>
Cc: [Redacted] <[\[Redacted\]@apha.gov.uk](mailto:[Redacted]@apha.gov.uk)>; [Redacted] <[\[Redacted\]@apha.gov.uk](mailto:[Redacted]@apha.gov.uk)>
Subject: RE: OFFICIAL SENSITIVE RE: salmon mortality - NORTH visit on site required

Dear All

[Redacted]

1. **WELFARE A visit is required on site** [Redacted]
2. [Redacted]
3. [Redacted]
4. [Redacted]

Another PDF in relation to Loch Duart detailed the following letter dated 30 October 2019:



Animal &
Plant Health
Agency

Animal and Plant Health Agency
Woodham Lane
New Haw
Addlestone
Surrey
KT15 3NB

T: 020 822 57636

www.gov.uk/apha

[Redacted]

(Sent by email)

30 October 2019

Dear [Redacted]

[Redacted]

[Redacted] possible indicator of fish health issues in the area. However, I can assure you that the Animal & Plant Health Agency (APHA) take all reports of potential welfare issues seriously and investigate all the reports that we receive.

Upon receipt of your reported findings, APHA informed the Fish Health Inspectorate (FHI), Marine Scotland, who subsequently confirmed there were no welfare concerns that would involve APHA at the site.

To re-iterate a previous statement; APHA are concerned with the welfare of farmed fish, but, it is the Fish Health Inspectorate (FHI) Marine Scotland who are responsible for investigating reports of mortalities and monitoring the health of farmed fish and wild fish.

With regards to your report about the bin full of dead fish, that is an Animal by Products (ABP) issue. Any potential breaches in the ABP legislation fall within the remit of the local authority trading standards who are responsible for enforcement of the ABP legislation and any concerns should be reported to them.

You also mentioned your concerns about a chemical smell in the area; that too would be an issue for the local authority, environmental health, to investigate, not APHA.

Another redacted email (01 Appendix LDA01) in relation to The Scottish Salmon Company's Loch Damph salmon farm included:

From: [REDACTED]
Sent: 30 September 2019 09:50
To: SM-APHA-APHA Scotland (APHA) <APHA.Scotland@apha.gov.uk>
Subject: salmon mortality

Hi, on a recent trip to Loch Damph [REDACTED]

[REDACTED]

[REDACTED]

An 'Initial Welfare Incident Record Form' (02 Appendix MCFF02) detailed a complaint regarding Mowi's salmon farm off the Isle of Muck in September 2019.

Appendix MCFF02

Department of the Environment, Food and Rural Affairs
Scottish Government
Welsh Government



Initial Welfare Incident Record Form

For use by all staff who receive a complaint/referral/intelligence about animal welfare from any source

Report taken by: [REDACTED]	Complaint <input checked="" type="checkbox"/> Referral <input type="checkbox"/>
Origin: Anonymous	Received Date: 03/09/2019 Time: 09:00
Name and Address of Premises: Mowi Scotland Limited Head Office Rosyth Admiralty Park Admiralty Road Rosyth Fife Postcode KY11 2YW	Sam WS ID: [REDACTED] CPH No: N/a Third Party Ref No: [REDACTED] Map Reference: NM43248035 Telephone Number: [REDACTED]

Location of animals if different from above Site Number FS1286 (Muck) National grid reference-NM43248035

Nature of Complaint or other information [REDACTED]
--

The welfare risk was deemed 'medium' with a recommended visit in conjunction with the FHI (Fish Health Inspectorate) "at the earliest opportunity".

VRA:

Priority of visit:

High 1	<input type="checkbox"/>	Medium 3	<input checked="" type="checkbox"/>	Low 4	<input type="checkbox"/>	Other N/A	Please Select...
-----------	--------------------------	-------------	-------------------------------------	----------	--------------------------	--------------	------------------

(Where VRA indicates High Risk complaint visits must be carried out within 24 hours)

Required/suggested timescale for visit:

WF77 (Rev. 10/17)

OFFICIAL-SENSITIVE

Action

SFP Claimant: Yes No Selected for Priority 2 XC audit inspection? Yes No
SBI/CRN/BRN: If Yes, WS-ID:

Supporting comments:

Emails marked 'High Importance' (01 Appendix MCFF01) addressed a follow up inspection regarding Mowi's Muck salmon farm following an anonymous complainant who supplied video and photographic evidence.

[REDACTED]

From: SM-APHA-APHA Scotland (APHA)
Sent: 03 September 2019 11:29
To: SM-APHA-Scotland-Welfare (APHA)
Subject: FW: Muck MCFF Disclosure with regards Fish Health and Welfare
Attachments: 2.jpg; 1.jpg; 4.jpg; 5.jpg; 6.jpg

Importance: High

Address details:-

Isle of Muck Salmon Farm, Mallaig.

Head office address:-

Head office Roysth
Admiralty Park
Admiralty Road
Roysth
Fife
KY11 2YW

01397 701550

Mowi Scotland Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

01397 715074

From: SM-APHA-APHA Corporate Correspondence
Sent: 03 September 2019 10:56
To: SM-APHA-APHA Scotland (APHA) <[REDACTED]@apha.gov.uk>; [REDACTED] <[REDACTED]@apha.gov.uk>; [REDACTED] <[REDACTED]@apha.gov.uk>
Cc: SM-APHA-APHA Corporate Correspondence <APHA.CorporateCorrespondence@apha.gov.uk>
Subject: FW: Muck MCFF Disclosure with regards Fish Health and Welfare
Importance: High

Colleagues,

Email from [REDACTED] reporting welfare issue on Muck salmon farm. Please can a welfare visit be arranged.

Thanks

[REDACTED]
Executive Support & Correspondence Management
email: APHA.CorporateCorrespondence@apha.gov.uk
Animal and Plant Health Agency (APHA)

Website: www.gov.uk/apha | Twitter: [@APHAgovuk](https://twitter.com/APHAgovuk) | Facebook: [aphagov](https://www.facebook.com/aphagov)

Address: APHA, Room B1, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD.

From: SM-APHA-Enquiries APHA
Sent: 30 August 2019 14:02
To: SM-APHA-APHA Corporate Correspondence <APHA.CorporateCorrespondence@apha.gov.uk>
Subject: FW: Muck MCFF Disclosure with regards Fish Health and Welfare

Dear [REDACTED]

As discussed on the phone please can you take a look

Kind Regards

[REDACTED]
From: [REDACTED]
Sent: 30 August 2019 13:18
Subject: Muck MCFF Disclosure with regards Fish Health and Welfare

To whom it may concern,

I am making this disclosure on behalf of a third party who wishes to remain anonymous, concerning ongoing issues of fish welfare and health on Muck salmon farm, as well as [REDACTED]. I make no comment personally as to the veracity of the claims.

The factual information along with images and video I am sharing have been given to me by a third party [REDACTED]. Freedom of Information requests may be made in the future to confirm this has not taken place.

In summary the following has been alleged [REDACTED]

[REDACTED]

- Evidence to support the claim has been presented [REDACTED]
[REDACTED] there are images [REDACTED]

- [REDACTED]

- In terms of fish welfare an individual sent me a message which said [REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]

I trust you will take the appropriate actions.

yours sincerely,

[REDACTED]

'Case Information' [published by the Scottish Government's Fish Health Inspectorate](#) detailed an inspection with APHA on 19 September 2019.

Case No:	2019-0391	Date of visit:	19/09/2019			
Time spent on site:	7 hrs	Main Inspector:	[REDACTED]			
Site No:	FS1286	Site Name:	Muck			
Business No:	FB0119	Business Name:	Mowi Scotland Ltd			
Case Types:	1 ECI	2 CNI	3 SLI	4 VMD	5 WEL	6 [REDACTED]
Water Temp (°C):	13.9	Thermometer No:	T153	FHI 045 completed	[REDACTED]	
Observations:	Region:	HI	Water type:	S	CoGP MA	None
Dead/weak/abnormally behaving fish present?	<input checked="" type="checkbox"/> If yes, see additional information/clinical score sheet.					

Additional Case Information:

Accompanied APHA following welfare complaint.

Very calm conditions at time of inspection excellent visibility during first half of inspection, weather conditions changed, however visibility was still very good. 1 dead (not fresh) and 2 moribund (one had spinal deformity) observed across site. 12 lethargic observed across site, but these were active and deeper in the water

Divers on site weekly for net checks and mortality removal. Usually ensile mortalities on barge at site, however, due to numbers recent mortalities were being transferred in leak proof bins to Mallaig for collection and transport to Dundas. The Oygarden was on site at time of inspection completing mortality removal in all cages. This vessel is set up to process and ensile the mortalities before transporting to their destination.

Mortality Records	
1. Mortality records available for inspection?	<input type="checkbox"/> Y
2. How are mortalities disposed of?	Whole fish - Dundas Chemicals
If other detail:	
3. Mortality records complete and correctly entered?	<input type="checkbox"/> Y
4. Recent mortality (last 4 wks):	WK 36 (02/09) - 15,573 for site attributed to PD, WK 37 09/09 - 10,116 for site attributed to PD and WK 38 (16/09 to 19/09) - 7,065 for site attributed to PD.

A letter to Mowi from the Scottish Government in December 2019 [published with the FHI 'Case Information'](#) referred to a separate report to be issued by APHA.

[REDACTED]
Mowi Scotland Ltd
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX
[REDACTED]

FISH HEALTH INSPECTORATE VISIT REPORT

SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No	FB0119	DATE OF VISIT	19/09/2019
SITE No	FS1286	SITE NAME	Muck
INSPECTOR	[REDACTED]	CASE No	20190391

The above site was inspected with veterinarians from the Animal and Plant Health Agency (APHA) following a fish health and welfare complaint received by both the Fish Health Inspectorate and APHA.

A full EC inspection was conducted at time of inspection and a separate report has been issued.

A separate report will be issued by APHA.

Please contact myself or the duty inspector should you require any further information or have any queries regarding this report.

Signed:



Fish Health Inspector

Date: 12/12/19

APHA's report on Mowi's Isle of Muck salmon farm has not been disclosed so Scottish Salmon Watch's FOI review request will specifically request a copy. Data [published by the Scottish Environment Protection Agency in March 2020 reports huge breaches of biomass limits at Mowi's Muck salmon farm in June, July, August and September 2019.](#)


Don Staniford
 @TheGAAIA

As Scottish salmon farmers shamelessly seek to exploit #Coronavirus - @SSPOsays are lobbying @ScottishEPA @marinescotland to increase biomass limits - here's salmon farms breaching biomass limits in 2019 @MowiScotlandLtd Where's there's Muck there's Mowi money! @HamishMacdonell

Year	Submitted By	Biomass Exceedence Tonnes	Site Name
01-Jul-19	Mowi Scotland Ltd	942.8497487	Am Maol, Isle of Muck
01-Aug-19	Mowi Scotland Ltd	779.6071707	Am Maol, Isle of Muck
01-Jun-19	Mowi Scotland Ltd	570.0859908	Am Maol, Isle of Muck
01-Sep-19	Mowi Scotland Ltd	549.394223	Am Maol, Isle of Muck
01-Sep-19	Mowi Scotland Ltd	486.5900563	Bagh Dail nan Ceann North and South
01-Jul-19	Mowi Scotland Ltd	463.5125434	Bagh Dail nan Ceann North and South
01-Aug-19	Mowi Scotland Ltd	433.4627656	Bagh Dail nan Ceann North and South
01-May-19	Mowi Scotland Ltd	355.0536291	Am Maol, Isle of Muck
01-Sep-19	Mowi Scotland Ltd	305.3136406	MacLeans Nose
01-May-19	Mowi Scotland Ltd	301.5320431	Bagh Dail nan Ceann North and South
01-Oct-19	Cooke Aquaculture Scotland	219	Vest Ness
01-Sep-19	Cooke Aquaculture Scotland	219	Vest Ness
01-Aug-19	Cooke Aquaculture Scotland	207	Vest Ness
01-Feb-19	Mowi Scotland Ltd	197.6667414	Skipport Outer (Ornish)
01-Dec-19	Mowi Scotland Ltd	189.5474753	Grey Horse Channel
01-Jun-19	Cooke Aquaculture Scotland	171	Vest Ness
01-May-19	Cooke Aquaculture Scotland	171	Vest Ness
01-Jan-19	Mowi Scotland Ltd	170.3520848	Skipport Outer (Ornish)
01-Jul-19	Cooke Aquaculture Scotland	152	Vest Ness
01-Apr-19	Cooke Aquaculture Scotland	137	Vest Ness
01-Jun-19	Mowi Scotland Ltd	134.2341719	Bagh Dail nan Ceann North and South
01-Sep-19	Kames Fish Farming Ltd	104	Kames Bay
01-Dec-19	Cooke Aquaculture Scotland	82	Vee Taing

Fergus Ewing MSP and 9 others

5:52 PM · Mar 12, 2020 · Twitter Web App

Scottish Salmon Watch has obtained a unredacted original copy of the anonymous complaint regarding Mowi's Muck salmon farm.

From: corin@wildrisecompany.com <corin@wildrisecompany.com>
 Date: Fri, 30 Aug 2019 at 13:17
 Subject: Muck MCFE Disclosure with regards Fish Health and Welfare
 To:

To whom it may concern,

I am making this disclosure on behalf of a third party who wishes to remain anonymous, concerning ongoing issues of fish welfare and health on Muck salmon farm, as well as potential biomass breaches at the fish farm. I make no comment personally as to the veracity of the claims.

The factual information along with images and video I am sharing have been given to me by a third party connected to the farm and they have asked that I ensure these should not be passed directly to the operator, or quoted directly, as this is likely to comprise the individual's employment. Freedom of Information requests may be made in the future to confirm this has not taken place.

The disclosure could be considered "whistleblowing" as it is my understanding that the disclosures represent a risk of or actual damage to the environment, albeit these are being made indirectly.

In summary the following has been alledged in respect of mortalities:

- There are a very high number of mortalities occurring on Muck MCFF. These may not have been properly or fully declared to Marine Scotland. These have occurred as a result of gill disease and physical damage during sea lice treatment.

- Evidence to support the claim has been presented in the form of AIS data which shows the transportation of morts on vessels specific to this purpose. Further there are images attached (1-6) which show mortalities being handled at Mallaig pier. These images (not all that have been captured) show the vessel "Paul B" lying dockside with over 20 tonnes of morts apparently onboard from a single trip. (Image "2") The AIS data confirms "Paul B" made a direct journey to and from Muck MCFF.

- Further evidence includes a first hand witness account of a large oil slick being present at Muck MCFF as recently as Wednesday this week. This encompassed the entire farm. It is suggested that this oil slick is consistent with very large numbers of mortalities having been present in the cages for up to two weeks. There is video footage of this here (<http://bit.ly/2L6XBCo>). This clip has been edited in order to protect the identity of the individual.

- In terms of fish welfare an individual sent me a message which said *"the fish had a gill problem (cant remember the exact name), and a mess was made of one of the hydro-lice treatments so the fish are in a very bad way. The fish are ten timse worse than you seen on tv..."*

The same individual also supplied information regarding biomass levels at the site, which may or may not be consistent with the current licence:

- [laughing crying emoticon] *"fish number the now is around 80k some cages have more tonnage up and round 300t"*

- *"Yeah mate. 1.1m fish left into 12 cages [shocked face emoticon] we can have 3500t on site at a time..we have hit the number so harvest roughly 100-120t out at a time then wait until we grow the site back up to 3500t then harvest again"*

I trust you will take the appropriate actions.

yours sincerely,

Corin

--

Corin Smith

Owner / Guide

+44 (0) 7463 576892

5 Attachments



The attached photos ([deemed by APHA in a FOI refusal letter dated 10 March 2020 to be commercially damaging and could result in "negative publicity"](#)) include:





Sadly the video footage cited in the complaint to APHA - <http://bit.ly/2L6XBCo> - is set to private.

Google Drive

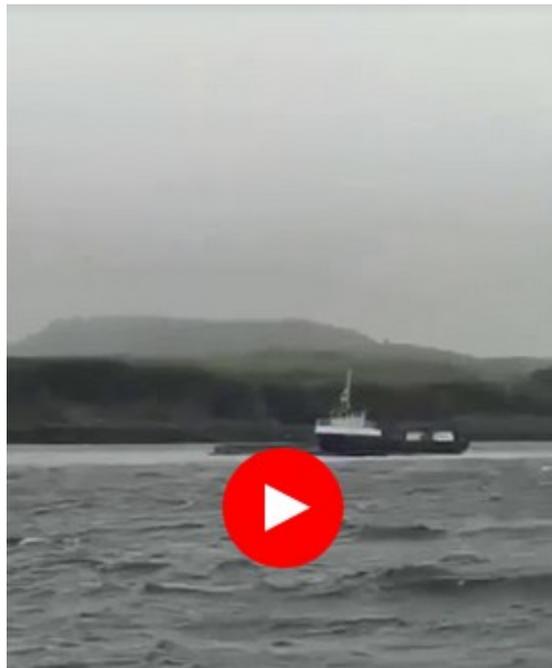
You need permission

Want in? Ask for access, or switch to an account with permission.

[Learn more](#)



However, earlier this week Scottish Salmon Watch obtained a copy of the video footage of the "large oil slick" at Mowi's Muck salmon farm.



Scottish Salmon Watch have now [published the video footage online](#)



An 'Initial Welfare Incident Record Form' (01a Appendix GS01a) detailed an anonymous complaint in January 2019 regarding Grieg Seafoods in Loch Dunvegan.

Department of the Environment, Food and Rural Affairs
 Scottish Government
 Welsh Government



Initial Welfare Incident Record Form

For use by all staff who receive a complaint/referral/intelligence about animal welfare from any source

Report taken by: [REDACTED]	Complaint <input type="checkbox"/>	Referral <input checked="" type="checkbox"/>
Origin: Other Third Party	Received Date: 07/01/2019	Time: 09:30
Name and Address of Premises: Grieg Seafoods Dunvegan Isle of Skye	Sam WS ID: [REDACTED]	CPH No: [REDACTED]
Postcode IV55 8WF	Third Party Ref No: [REDACTED]	Map Reference: [REDACTED]
		Telephone Number: [REDACTED]

Location of animals if different from above

Nature of Complaint or other information

Complaint passed to us from [REDACTED].
 [REDACTED]

A heavily redacted email dated 14 January 2019 (01 Appendix GS01) details a visit and a "follow up inspection" to Grieg Seafoods in Loch Dunvegan.



Initial Welfare Incident Record Form

For use by all staff who receive a complaint/referral/intelligence about animal welfare from any source

Report taken by: [REDACTED]	Complaint <input checked="" type="checkbox"/> Referral <input type="checkbox"/>
Origin: Other Third Party	Received Date: 19/07/2019 Time: 15.50
Name and Address of Premises: Mowi Scotland Bagh Dail nan Ceann (Bay of the Dead Heads) in the Sound of Jura	Sam WS ID: [REDACTED]
	CPH No: [REDACTED]
	Third Party Ref No: [REDACTED]
	Map Reference: [REDACTED]
Postcode	Telephone Number: [REDACTED]

Location of animals if different from above

More details not present

Nature of Complaint or other information

Email sent to APHA, Marine Scotland and Wildlife Crime from [REDACTED].
[REDACTED]

The complaint - even with the [shocking video footage](#) which led to [Mowi being found guilty of non-compliances](#) - was deemed 'Low' priority with an inspection visit in conjunction with Marine Scotland suggested in 1 month.

Welfare Category	Farm	<input checked="" type="checkbox"/>	Market	Source		Slaughter	Location		Transport	<input type="checkbox"/>	
				Market	<input type="checkbox"/>		Farm	<input type="checkbox"/>			Other
Name of Informant	[REDACTED]										
Address of informant	[REDACTED]										
	Postcode					Telephone Number	[REDACTED]				
Does the allegation indicate actual suffering in animals?						Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>		
Name of Veterinary Officer (VO) carrying out Veterinary Risk Assessment (VRA)						[REDACTED]					
Date of VRA	19/07/2019				Time of VRA	16.15					
VRA: Priority of visit:	High 1	<input type="checkbox"/>	Medium 3	<input type="checkbox"/>	Low 4	<input checked="" type="checkbox"/>	Other N/A	Please Select...			
(Where VRA indicates High Risk complaint visits must be carried out within 24 hours)											
Required/suggested timescale for visit:						1 month. Fish welfare team to assess with Marine Scotland					

WF77 (Rev. 10/17)

OFFICIAL-SENSITIVE

Action

[REDACTED]

SFP Claimant: Yes No Selected for Priority 2 XC audit inspection? Yes No

SBI/CRN/BRN: [REDACTED] If Yes, WS-ID: [REDACTED]

Supporting comments:

[REDACTED]

Does this report require a visit within one working day (Priority 1)? Yes No

a) If Yes - to whom allocated? VO AHO

Name of VO or Animal Health officer (AHO) attending incident [REDACTED]

b) If No - to whom is report to be sent for visit at a later/more appropriate date? Fish welfare to assess and allocate

Local Authority (LA) for this location [REDACTED]

LA requested to visit Yes No

LA contacted Yes No

An email sent by Mowi to APHA and DEFRA on 31 October 2019 (02 Appendix MBDNC02) detailed a [news release published by Mowi on 30 October 2019](#) admitting to welfare breaches at 'Bay of the Dead Heads' and subsequent media coverage.

From: [redacted]@mowi.com]
Sent: 31 October 2019 09:52
To: [redacted]@defra.gov.uk>; [redacted]@apha.gov.uk>
Cc: [redacted]@apha.gov.uk>; [redacted]@mowi.com>
Subject: RE: APHA letter

Hi [redacted], just a quick follow up to say that we published our news release yesterday – posted at <https://mowiscotland.co.uk/2019/10/30/warm-temperatures-challenge-fish-health/>.

It has since been covered by several online trade sources:

- <https://salmonbusiness.com/authorities-raised-concerns-over-mowi-scotland-lumpfish-health-and-welfare-during-month-of-warm-sea-temperatures/>
- <https://www.fishfarmingexpert.com/article/above-average-temperature-blamed-as-mowi-fish-survival-rate-falls/>
- <https://thefishsite.com/articles/mowi-scotland-finds-itself-in-hot-water>
- <https://www.undercurrentnews.com/2019/10/31/mowis-salmon-suffer-high-water-temperatures-in-scotland/>

Cheers,

[redacted], Mowi

Read more via: [Sunday National/Ferret: "Salmon company Mowi rapped over fish welfare after 700,000 deaths"](#)



APHA's FOI disclosure on 10 March 2020 sheds more light on this case and suggests that [Mowi's press release issued on 30 October 2019](#) was prompted by a letter from APHA sent to Mowi on 16 September 2019 (03 Appendix MBDNC03).



**Animal &
Plant Health
Agency**

Animal and Plant Health Agency
Strathern House
Broxden Business Park
Lamberkine Drive
Perth
PH1 1RX

T 03000600704

www.gov.uk/apha

Mowi Scotland Limited

Farms Office

Glen Nevis Business Park
Fort William
PH33 6RX

16 September 2019

Dear [REDACTED]

Failure to Comply with Welfare Legislation

Animal Health and Welfare (Scotland) Act 2006

Following my visit on 2/08/19 to inspect your livestock at Marine Fin Fish farm (Atlantic Salmon) FFMC54 BDNC- Bagh Dail nan Ceann (Bay of the Dead Heads) in the Sound of Jura, in the presence of [REDACTED] (site Manager), [REDACTED] (Mowi's Area Manager), [REDACTED] (APHA VA) and [REDACTED] (FHI Marine Scotland), I must advise you that I found the following non-compliances with current welfare legislation.

Mortality in lumpfish has been a known ongoing issue, affecting the 80% of the lumpfish stocked during this production cycle at the above fish site under your responsibility.

On the day of the visit at the site (02/08/19), data provided by your staff regarding your investigation of mortality and consequential actions was not satisfactory. [REDACTED] Seeking for a health plan for lumpfish at the site at the time of the visit and further clarification regarding the health management for the investigated period, a second meeting as part of the investigation took place at APHA Perth office on Tuesday 13/08/19 with yourself, [REDACTED] (Lead Vet) and [REDACTED] (Health Manager).

During this meeting, evidence were provided of investigations and actions taken to try and minimise an increasing mortality trend in lumpfish from May 2019 until the treatment provided in between 01/07/19 to 03/07/19. After this day, there is little evidence of actions taken whilst the mortality in lumpfish continued to increase.

During the meeting on the 13/08/2019 you confirmed that a decision to humanely cull the remaining lumpfish had be taken the day before and had already started.

You have not been able to show that adequate actions were taken in the period between the 10/07/19 to the 12/08/19 in order to promote the welfare of the lumpfish under your responsibility. Not taking effective decision at earlier date has prolonged the period while the lumpfish still at the site have been in need to be protected from suffering and disease.

This is a failing to comply with the Animal and Welfare (Scotland) Act 2006, Part 2-24 (1) and 3(e) that states that:

"a person commits an offence if the person do not take such steps as are reasonable in the circumstances to ensure that the needs of an animal for which the person is responsible are met to the extent required by good practice";

An animal's needs include *"its need to be protected from suffering, injury and disease."*

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

WF08 (Rev. 06/17)

OFFICIAL-SENSITIVE

As discussed during the onsite visit and the second meeting, it would be helpful to keep separated records for mortality and culled animal not only for salmon as you are correctly doing, but also for lumpfish and wrasse in order to have a detailed monitoring system for all species under your responsibility.

This letter is without prejudice to any further enforcement or other action, which may be taken at a later date.

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

[REDACTED]

APHA

[REDACTED]

Mobile: [REDACTED]

Email Address: [REDACTED]@apha.gov.uk

Scottish Salmon Watch is unclear why this letter is not redacted to the extent of other PDFs disclosed by APHA.

[2] The week before APHA's FOI disclosure on 10 March 2020, [APHA's Jenni Diffin told the Fish Veterinary Conference in Edinburgh that there had been a significant increase in welfare complaints over the last 18 months.](#)

Fish Farmer [reported \(5 March 2020\)](#):

Fish welfare complaints 'can be taken out of context'

By [Jenny Hjul](#) - 5th March 2020



There has been a significant increase in fish welfare complaints in the past 18 months

THERE has been a significant rise in the number of fish welfare complaints received by government agencies over the past 18 months.

Jenni Diffin of the Animal and Plant Health Agency (APHA), which works for Defra (Department for Environment, Food and Rural Affairs), told the Fish Veterinary Society conference in Edinburgh on Tuesday that her organisation has had to beef up its fish welfare team in Scotland.

This was in response to an increase in complaints against salmon farms, which come from 'certain groups that most people will be aware of', as well as from members of the public and the SSPCA (Scottish Society for the Prevention of Cruelty to Animals).

However, the complaints can be taken out of context, and an issue with a single fish can be interpreted as a problem with an entire farm.

'The increase in complaints has come over the last 18 months; before, there were certain people who didn't think we had anything to do with fish welfare so we weren't receiving the complaints,' said Diffin.

'Now they've realised that we have a remit in it, that's pushed it and also driven Scottish government to increase our capabilities to respond to these complaints.'

APHA is responsible for monitoring compliance with animal welfare regulations through routine welfare inspections, and responding to welfare complaints.

When APHA receives a complaint, its officers liaise with other bodies with welfare responsibilities, including the welfare inspectors of local authorities, the Fish Health Inspectorate (FHI) and Marine Scotland.

Diffin said a big increase in the public interest in fish welfare – prompted in part by programmes such as the BBC's Panorama special on salmon farming – was behind the 'great increase in the number of fish complaints we have received', and subsequently the number of fish inspections.

The reasons for complaints vary from high mortality events, chemical use and sea lice levels. Cleaner fish also feature, with 'some sort of vague allegations of welfare abuse and unnecessary suffering'.



Graph showing reasons for complaints

Diffin said APHA is often sent photographs with complaints.

'The problem we sometimes have with these pictures is the complainants are taking these a little bit out of context,' she said. 'They are looking at a single fish and taking that as a welfare issue on a farm.'

The APHA team tends to assess the information it receives in collaboration with the FHI before carrying out visits, and will generally go out to the farm concerned with the FHI and sometimes the local authority as well.

At the farm, APHA wants to find out if there has been an incident, whether it is an environmental issue, a disease issue, when it happened and what actions took place.

'If you've had an incident and you've been dealing with it, then you are doing what you can to protect the welfare of your fish.'

'Just as with any other heavily intensive industry, like pigs and poultry, we don't expect incidents not to happen; it's how they are dealt with,' she said.

Diffin said they also receive complaints about by-product issues, because people don't like to see fish morts being transported. APHA looks at the storage of mortalities, how they are transported, incinerators on sites, and disposal.

'What quite often happens is we get complaints because people have seen large vehicles leaving fish sites with large numbers of mortalities.'

'They don't look into the context of it, they just see a spike in mortalities so think there must be a welfare problem and report it.'

'That isn't always the case but we are starting to see more and more of these complaints and I suspect it will continue to increase, so these visits will become more fundamental.'

The Fish Veterinary Society annual conference was held at the Norton House Hotel, Edinburgh, from March 3-4.

 **Salmon Research**
@salmonresearch

We're back to the "one or two fish" bluff again.

To put salmon farming welfare into context, over 6 million animals were found dead in 2019 and over 15 million were "culled" due to disease, flaying injuries, lice infestation, treatments etc.

Mostly on @rspcaassured feedlots.

 **AWF** @AWF_VETS · Mar 9

APHA have recently reported a big rise in fish welfare complaints, but add that context is key. At this year's Discussion Forum we will explore the relationships between farming methods (🐟👤🔍), production systems and welfare - book now! #AWFDebate

ow.ly/K9RM50yGrBb



8:11 AM · Mar 10, 2020 · Twitter for iPhone

[3] In September 2019, [The Ferret reported](#):



Government investigations into alleged animal cruelty after scarred, frayed and lice-infested salmon were filmed at a fish farm on the island of Lewis were a “whitewash”, according to a new report.

A year-long investigation by a campaigner has concluded that inspections by Scottish and UK government watchdogs giving Vacasay fish farm in Loch Roag the “all clear” were flawed.

The report alleges the fish farm was alerted to inspections in advance and that inspectors relied on information provided by The Scottish Salmon Company, which runs the farm.



On 3 September 2018 The Ferret [published video footage](#) shot underwater inside a cage at Vacasay fish farm, showing hundreds of sea lice feeding on salmon with open wounds, damaged tails and fins.

The video prompted investigations by the Scottish Government’s [Fish Health Inspectorate \(FHI\)](#), the UK government’s [Animal and Plant Health Agency \(APHA\)](#) and the [Scottish Society for the Prevention of Cruelty to Animals \(SSPCA\)](#).

FHI issued the farm with an “advisory letter” requesting a review of the measures to control lice. The APHA concluded that “appropriate measures” were in place, and the SSPCA said that “all measures possible” had been taken to ensure fish welfare.

But an anti-fish farming campaigner, Corin Smith, who shot the video footage, is publishing a 72-page report entitled ‘An Autopsy Of An All Clear’.

“The available data suggests the findings and conclusions reached by the APHA were premature and flawed, and therefore should be urgently reviewed,” he said.

“Both the FHI and the APHA relied entirely on information given to them voluntarily and at the discretion of The Scottish Salmon Company. There was no apparent effort by either agency to subsequently validate this data or source independent data to validate their findings.”

Smith’s report has evidence that FHI alerted the fish farm by phone three days before inspections took place. The farm was told what paperwork would be inspected and that a physical inspection would take place, he said.

“Physical inspection of salmon farm stock by the FHI and the APHA for sea lice numbers and welfare appeared to be operator led, superficial and lacking any rigour or standardised processes and procedures,” his report concluded.

Smith told The Ferret that in September 2018 Vacasay was “a welfare and environmental disaster”. Tens of thousands of salmon were eaten alive by lice at levels 1,300 per cent higher than they should have been, he claimed.

“That this open cage salmon farm received an all clear within 24 hours and no punishment other than an advisory letter is difficult to understand. The whole episode looks like little more than a Scottish Government whitewash,” Smith alleged.

“Instead of a robust, independent inspection regime with the genuine aim of protecting farm stock, wild fish and the environment from the impacts of industrial salmon farming, the Scottish Government is engaged in creating the illusion of regulation.”

Here's extracts from Corin Smith's 72-page ['An Autopsy Of An All Clear'](#):

AN AUTOPSY OF AN “ALL CLEAR”

Corin Smith

September 2019

On the 27 August 2018, just after 6am, footage revealing the conditions inside an Atlantic salmon farm run by The Scottish Salmon Company was captured for the first time. The farm was Vacasay open cage salmon farm on the Isle of Lewis.¹ The footage clearly showed farmed Atlantic salmon that were infested with large numbers of sea lice parasites and had suffered severe physical damage as a result. Consequently, the farm was inspected on the grounds of animal welfare and sea lice management by the Animal and Plant Health Agency (APHA) and the Fish Health Inspectorate (FHI) respectively. Inspections of the salmon farm by these Scottish Government agencies concluded that parasites were present throughout the farm, carrying stock of over 300,000 fish, at levels thirteen (13) times higher than the safe limits prescribed in the Salmon Farm Code of Good Practice.³



Farmed salmon on Vacasay Farm (credit: Corin Smith)

As a result of the inspections The Scottish Salmon Company received a “*sea lice advisory letter*”¹⁶ from the FHI and was given the “*all clear*” by the APHA.¹⁵ Both agencies concluded that the operator was taking “*appropriate measures*” to manage sea lice and that no further action was warranted.

KEY FINDINGS

1. The conclusion reached by the Animal Plant and Health Agency (APHA) that The Scottish Salmon Company (TSSC) had taken “*appropriate measures*” to manage the welfare of farm stock on Vacasay appears to have been largely based on a single source of incomplete and uncorroborated information. The available data suggests the findings and conclusions reached by the APHA were premature and flawed, and therefore should be urgently reviewed ([Click Here](#))
2. Claims by the Scottish Salmon Producers Organisation (SSPO) that the footage and issues exposed at Vacasay represented “*one or two photographs [.....] of one or two fish*” have been shown to be entirely false ([Click Here](#))
3. Information regarding concurrent mortalities at Vacasay salmon farm was apparently not available to the FHI and the APHA inspectors during their inspections and therefore was not considered as part of their findings and conclusions ([Click Here](#))
4. Data submitted by The Scottish Salmon Company shows that at least thirty nine percent (39.8%) of stock on Vacasay open cage salmon farm during died during the rearing process ([Click Here](#))
5. In reaching their findings both the FHI and the APHA relied entirely on information given to them voluntarily and at the discretion of The Scottish Salmon Company. There was no apparent effort by either agency to subsequently validate this data or source independent data to validate their findings ([Click Here](#))

INSPECTION OF VACASAY SALMON FARM

The Fish Health Inspectorate (FHI) and the Animal and Plant Health Agency (APHA) carried out an inspection of Vacasay open cage salmon farm on 5 Sept 2018, five days after Police Scotland was initially notified of welfare concerns.

Subsequent Freedom of Information (FOI) requests revealed the APHA gave the salmon farm an “*all clear*” within twenty fours of the inspection. The FHI issued an “*advisory letter*” for a what was considered a minor sea lice breach and took no further action.

Both agencies concluded that the operator was taking “*appropriate measures*” to manage sea lice.

Full Reports available here: <http://bit.ly/2QnYYO2>

The APHA inspector attending said:

"In the worst affected cage, I counted approximately 60 visibly affected salmon"

After nearly six months of FOI requests, refusals, reviews and appeals to the Information Commissioner, APHA's Preliminary and Full Case Reports were finally placed in the public domain.¹⁵ These were referred to in the course of reaching the findings of this report.

Prelim Report: <http://bit.ly/2Rvca4l>

Full Report: <http://bit.ly/2RvL7pu>

CONCLUSION

From the available vessel location information, it is difficult to see how the whole site at Vacasay was hydroliced four times in seven weeks (weeks 29 – 36) as reported and relied on by the Animal and Plant Health Agency (APHA).

The APHA report highlighted that in the seven weeks preceding the welfare inspection The Scottish Salmon Company had relied on "hydrolicing" to manage sea lice numbers, and presumably therefore, the welfare of the stock on Vacasay salmon farm.

The APHA reported that:

"during week 29 [Week beginning 16 July 2018] and over the next seven weeks "Hyrdolicer" treatment was given to all cages four times."

It was on this basis alone that APHA was content to conclude that:

"The site has experienced a high level of lice infestation, but the fish have been under veterinary supervision and have received suitable treatment in line with the site treatment strategy. I am content that the treatment of the fish at this site has been appropriate and timely. I do not intend to revisit the site."

It is clear that the APHA's findings and subsequent conclusion may be fundamentally flawed and should be urgently reviewed.

[4] A previous FOI request filed by Scottish Salmon Watch in October 2018 was also heavily redacted by APHA who cited commercial confidentiality as a reason for non-disclosure:

From: Enquiries APHA [mailto:enquiries@apha.gov.uk]

Sent: 21 December 2018 13:27

To: Don Staniford

Subject: Internal review Response ATIC1490

ATIC1490

Dear Don Staniford

Please find APHA's internal review response of your request for information.



Response
ATIC1490.pdf

ACCESS TO INFORMATION TEAM
enquiries@apha.gsi.gov.uk



**Animal &
Plant Health
Agency**

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

F 01932 357608
www.gov.uk/apha

Don Staniford
{By Email}

Our Ref: ATIC1490

21 December 2018

INTERNAL REVIEW RESPONSE

Dear Don Staniford

Following a request to review our response to you for following a request for information, an internal review has been conducted.

Our response dated 7 November 2018, advised your request had been handled under the Environmental Information Regulations (EIR). On review, this was incorrect in that your request asked for:

"Please provide information on inspections of salmon farms carried out by APHA during 2018. Please include any emails and correspondence with salmon farming companies, Marine Scotland, SSPCA and any other parties in relation to inspections of salmon farms during 2018. Please include copies of any "Reports on Fish Welfare for Scottish Government".

Environmental information is any information on:

- the state of the elements of the environment and the interaction among these elements;
- factors affecting or likely to affect those elements;
- measures or activities affecting or likely to affect those factors or elements, or designed to protect those elements;
- reports on the implementation of environmental legislation;
- cost-benefit and other economic analyses and assumptions used within the framework of those measures and activities; and
- the state of human health and safety, conditions of human life, cultural sites and built structures in as much as they are or may be affected by those elements.

The Animal and Plant Health Agency is an Executive Agency of the Department for Environment, Food and Rural Affairs working to safeguard animal and plant health for the benefit of people, the environment and the economy.

Therefore, this internal review concludes that your request for information on inspections does not fall under any of the categories defined under the EIR definitions as laid out by the Information Commissioner above. Your request should have been handled under the Freedom of Information Act (FOIA). The exemptions that apply to your request under the FOIA are explained below.

Exemptions

Section 40(2) in conjunction with 40(3)(a)i

This exemption has been applied because APHA consider that the information relating to the farm visits is personal data and that releasing it into the public domain would constitute unfair processing. Additionally one of the conditions set out in Schedule 2 to the Data Protection Act 2018 is satisfied.

The disclosure would be unfair for the reasons set out below:

The disclosure of personal data represents a form of data processing. This means that the conditions for fair and lawful processing of personal data set out in the first Data Protection Principle must be met. Consideration should also be given as to whether the disclosure was one of the purposes for which the data was originally gathered.

Information produced and held by APHA relating to a welfare visit constitutes personal data as it relates to an identifiable living individual. This data was gathered by APHA with the sole purpose of carrying out APHA's duty to undertake welfare on farms inspections and sharing the data with the farmer and in some cases with those who have statutory powers of prosecution. Farmers undergoing welfare on farm inspections are not informed that the outcome of these visits will be shared with anyone other than those they have a reasonable expectation of. For this purpose, there is a reasonable expectation of confidentiality between APHA, the farmer concerned and those with the power of prosecution. This would include an expectation from all parties that this information would not be released into the public domain. Releasing the information to you would equate to releasing the information into the public domain and APHA considers this unfair processing of the information held.

The review finds that none of the conditions under schedule 2 are met, namely:

- The farmer had not given his/her consent to the disclosure (at the time when the data were gathered).
- The disclosure is not in the legitimate interests of APHA or of the third party to whom the data are to be disclosed, and would prejudice the rights, freedoms or legitimate interests of the farmer.

- There is no statutory or legal obligation for APHA to disclose the data to a third party or to make the data publically available.
- The disclosure is not required for the performance of a contract
- The disclosure is not necessary to protect the vital interests of the farmer.

The information produced and held by APHA regarding welfare inspections is intended for the sole purpose of carrying out APHA's duty to undertake welfare on farm inspections and sharing the information with the farmer and in some cases with the relevant authorities whom have statutory powers of prosecution. There is an expectation of confidentiality between APHA, and the farmer concerned, which would be breached if APHA released welfare inspection information into the public domain.

APHA acknowledge that there is a public interest in knowing that APHA are undertaking their duties regarding welfare inspections, and we have released information which confirms that these visits have taken place following complaints we have received. APHA consider this is intended to meet the public interest in demonstrating that any potential welfare concerns raised have been followed up appropriately and that the relevant body will discharge their duties should non-compliances be identified. The public interest in seeing the contents of welfare inspection reports or findings does not outweigh the right to the farmer's right to fair processing.

APHA does not disclose the outcome of welfare inspections, regardless of whether any non-compliances are found or not. APHA consider there is a real risk of harassment to farmers if the inspection reports were to be released. For example if a non-compliance were to be found, in some cases the farmer may be able to make required change(s) within an agreed time period. If information relating to the initial outcome of inspections were released into the public domain, there would be a real risk to farmers that have rectified problems, that reports could be taken out of context or which could lead to misunderstanding, harming the farm's reputation and business, causing distress for the individuals concerned.

Internal Review Decision

The internal review has determined that the incorrect legislation was applied when answering this request and that as an FOIA should have been applied.

The redacted documents remain as supplied as we have concluded that, in all the circumstances of the case, the information is withheld under Section 40(2) in conjunction with 40(3)(a) of the FOIA.

Yours sincerely

ACCESS TO INFORMATION TEAM

Email: enquiries@apha.gov.uk

Complaints

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

From: Enquiries APHA [mailto:enquiries@apha.gsi.gov.uk]

Sent: 30 November 2018 16:44

To: Don Staniford

Subject: RE: Review request re ATIC1490

Dear Don Staniford

Ref: ATIC1490

If you are unhappy with the result of your request for information you may request an internal review within 40 working days of receiving a response letter. APHA have taken your email as such a request for our responses to you for ATIC1490.

We aim to respond to you within 20 working days of the date your internal review request was received on 7 November 2018. If for any reason we are unable to meet this deadline we will keep you fully informed of the reasons for this.

APHA's internal review process will be looking at what you requested and based on that, whether your request for information was responded to in full at the time of the request, what exemptions were applied and why and whether you received our response within the legislative deadline.

In the meantime, if you have any queries, please contact the Access to Information Team at the email address below.

ACCESS TO INFORMATION TEAM

enquiries@apha.gsi.gov.uk

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

Sent: 07 November 2018 11:20

To: 'Enquiries APHA'

Cc: 'APHA.Scotland@apha.gsi.gov.uk'; 'APHA Corporate Correspondence'

Subject: Review request re ATIC1490

Please consider this a formal request for a review of ATIC1490.

In summary, APHA's reply dated 7 November 2018 is wholly unacceptable, unreasonable and represents an affront to public accountability and transparency.

For example, Appendix 11 features so much redacted information that it renders the document useless:

14. Action



Visit required following a complaint regarding fish health and potential welfare issues at [REDACTED]

Visit done in conjunction with FHI

[REDACTED]

Appendix 12 is similarly redacted:

Action

[Redacted] have been visited in [Redacted]

SFP Claimant: Yes No Selected for Priority 2 XC audit inspection? Yes No

SBI/CRN/BRN:

If Yes, WS-ID:

Supporting comments:

[Redacted]

As is Appendix 10:

Visit required following a complaint regarding fish health and potential welfare issues at [REDACTED]

Visit done in conjunction with FHI

Fish seen on camera looked fine exhibiting normal behaviour and no significant signs of disease or lesions

[REDACTED]

And Appendix 9:

9. Findings

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

[REDACTED]

And Appendix 3:

BACKGROUND:- The [redacted] sea site situated in [redacted], Lewis is owned and operated by the Scottish Salmon Company has [redacted] round cages. The cages are [redacted] deep with an [redacted]. [redacted] cages were stocked with approximately [redacted], average weight [redacted] and [redacted] in each cage at the time of the visit. The fish were [redacted]. The site is due to be [redacted] restocked. [redacted]

A welfare complaint was received on the 30th August alleging that the fish were badly affected with sea lice. A joint visit was arranged and carried out on the 5th September with [redacted], FHI and the company veterinary surgeon [redacted] to assess the situation.

FINDINGS:- [redacted]

[redacted]

[REDACTED]

[REDACTED]

As part of the health check visit by the FHI, [REDACTED]

[REDACTED]

[REDACTED]

CONCLUSION:- [REDACTED]

[REDACTED]

And Appendix 6:

FINDINGS

1. The site records indicated [REDACTED]
[REDACTED]
[REDACTED]. [REDACTED]
[REDACTED]
[REDACTED]

2. I inspected cages [REDACTED], [REDACTED]
[REDACTED] - [REDACTED]
[REDACTED] [REDACTED] [REDACTED]
[REDACTED] welfare of the fish at the site.

3. The stocked cages [REDACTED] fish each and at the time of my visit, [REDACTED]
[REDACTED] You indicated that in addition [REDACTED]
[REDACTED]

4. [REDACTED]
[REDACTED]
[REDACTED].

ACTIONS

1. [REDACTED]
[REDACTED]
[REDACTED]

APHA's response makes a mockery of Freedom of Information laws and shows a total lack of respect for public disclosure and illustrates APHA's contempt for public accountability. What does APHA have to hide?

Similar case information is routinely disclosed by the Scottish Government via their Fish Health Inspectorate reports of salmon farms - see online via:
<https://www2.gov.scot/Topics/marine/Fish-Shellfish/FHI/CaseInformation>

Why should APHA be immune from the same rules and laws on transparency and disclosure?

APHA should be dragged kicking and screaming if they have to out of the dark ages and into the light (however ugly APHA will look in the light of public disclosure).

APHA's letter of reply dated 7 November 2018 included the lily-livered suggestion that "APHA have not been given permission from those who provided the information to disclose it within the public domain":

The public interest in releasing the information regarding the inspections was considered. APHA are aware of released video footage on the welfare of fish and media coverage of which is likely to raise public discussions. APHA have confirmed that action is taken following complaints they receive and undertake inspections to follow up on these. We do recognise the public interest in the results of our inspections with interest in our final report findings. As a result of the release of information supplied with the request APHA confirm that this specific welfare complaints were investigated.

However, after considering the interest in releasing the report findings and that of the farmer, our decision was not to release the full inspection information. The persons of the farms supplied the necessary information APHA required to complete a full report during our visit. They were not advised and had no expectation that the information APHA collected would be shared with anyone else other than those persons involved in the inspection. In addition to this, APHA have not been given permission from those who provided the information, to disclose it within the public domain.

The information has been obtained by APHA to undertake our duties under the Animal Health and Welfare (Scotland) Act 2006 and The Welfare of Farmed Animals (Scotland) Regulations 2010 for the purpose of safeguarding public and environmental health.

The Scottish Salmon Company and Scottish Sea Farms do NOT need to give permission to APHA to disclose information. Scottish Salmon Watch's interpretation of the FOI laws is that APHA has a duty in the public interest to disclose the information. Salmon farming companies do not have a veto on disclosure.

Scottish Salmon Watch points APHA to another FOI case involving The Scottish Salmon Company and Scottish Sea Farms when their lawyers threatened legal action to prevent disclosure:

[Ferret: "Salmon firms bid to block diseased fish photos"](#)
[REVEALED: Legal Threats to Prevent Publication of Damning Photographs](#)

In this case, the Scottish Government upheld the FOI laws and disclosed damning photos against the wishes of the salmon farming companies. Scottish Salmon Watch urges APHA to show the same fortitude in the face of industry intimidation.

Please provide information on inspections of salmon farms carried out by APHA during 2018.

Please include any emails and correspondence with salmon farming companies, Marine Scotland, SSPCA and any other parties in relation to inspections of salmon farms during 2018.

Please include copies of any "Reports on Fish Welfare for Scottish Government".

For example, Corin Smith [posted on Facebook](#) earlier today:

Scottish Government

Animal Health & Welfare Act (Scotland) 2006

Animal & Plant Health Agency

Photos from Corin Smith - Inside Scottish Salmon Feedlots's post in Timeline Photos

Report on Fish Welfare for Scottish Government

Part 1: General details

1. Reference number: FS1091

2. Name and address: Scottish Salmon Company, Vacasay site
Breasclett Pier
Breasclett
Isle of Lewis
Postcode HS2 5DY

3. Location of Fish (if different from above): Vacasay (see site)
Loch Rog an Ear
Lewis
Postcode HS2 5DY

4. Date of Visit: 05/09/2018

5. Time of visit: 09:00-14:00

Part 2: Detail

6. Present at visit:
(List the names and roles of attendees at the visit)

SVI [redacted], FHI [redacted], PVS for Scottish Salmon company [redacted]
SSC site manager.

7. Reason for Visit:
(state specific reason for visit i.e. routine visit, complaint etc. If a complaint include by whom)

WF77 welfare complaint received from Mr Corin Smith alleging severe sea lice infestation

8. Background
(include nature of site (sea/freshwater), species, number, production aim, production cycle, source, history of unit, any recent changes, transport used, veterinary and other advisers).

Welfare complaint received on 30/08/18 alleging poor welfare due to sea louse infestation.
Visit to site arranged with FHI and site operator. Company veterinary surgeon [redacted] was also present at the visit on Wednesday 5th September 2018.
FHI conducted a health visit and I accompanied the inspector. Mortality, treatment and sea lice number records were checked. At the time of the visit the fish on the site were [redacted]
cages on site were stocked [redacted]

Like Comment Share Options Send in Messenger

WF151 (Rev. 05/18) OFFICIAL-SENSITIVE

Photos from Corin Smith - Inside Scottish Salmon Feedlots's post

in Timeline Photo

(include disease situation and duration, mortalities and other significant records, feeding patterns, advice sought, diagnosis, treatment, vaccinations, culling, expectations etc).

BACKGROUND:- The **Vacasay** sea site situated in Loch Rog an Ear, Lewis is owned and operated by the Scottish Salmon Company has [redacted] round cages. The cages are [redacted] deep with an [redacted] average weight [redacted] in each cage at the time of the visit. The fish were [redacted] restocked.

A welfare complaint was received on the 30th August alleging that the fish were badly affected with sea lice. A joint visit was arranged and carried out on the 5th September with [redacted], FHI and the company veterinary surgeon [redacted] to assess the situation.

FINDINGS:- [redacted]

[redacted]

[redacted]

As part of the health check visit by the FHI, [redacted]

[redacted]

CONCLUSION:- [redacted]

Like

Comment

Share

Options

Send in Messenger

Photos from **Corin Smith - Inside Scottish Salmon Feedlots's post**

in Timeline Photos

(outline any necessary actions)

Letter to the editor: [REDACTED]

11. Conclusions and recommendations

CONCLUSION: [REDACTED]

12. Overall Assessment: Compliant

Signature	<input type="text"/>	APHA office address APHA Inverness Longman House Longman Road Inverness IV1 1SF
Name in BLOCK LETTERS	<input type="text"/>	
Date	10/9/2018	
Tel No.	<input type="text"/>	

DATA PROTECTION
For information on how we handle personal data please go to www.gov.uk and search Animal and Plant Health Agency Personal Information Charter.

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

Like Comment Share Options Send in Messenger

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations.

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best fishes,

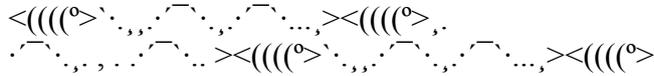
Don

Don Staniford

Director, Scottish Salmon Watch: <https://scottishsalmonwatch.org/>

Read my blog via <http://donstaniford.typepad.com/my-blog>

Please donate via <https://scottishsalmonwatch.org/donate>



[5] Documents disclosed by APHA via ATIC 1426 shed some light on how APHA police (or not as the case may be) salmon farms.

From: Enquiries APHA [mailto:enquiries@apha.gsi.gov.uk]

Sent: 18 October 2018 17:03

To: Don Staniford

Subject: Freedom of information ATIC1426

Ref: ATIC1426

Dear Don Staniford

Thank you for your request for information which we received on 24 September 2018.
Please see our response attached.

Regards

ACCESS TO INFORMATION TEAM

enquiries@apha.gsi.gov.uk



Appendix 9 Fish Welfare Report 2014.Welfare



Appendix 6 Fish ATIC1426.pc



Appendix 3 Costings ATIC1426_Redacted.



Appendix 12 AHVLA_AF Work



Appendix 11 Welfare ATIC1462.pdf



Appendix 10 Course contents ATIC1426.p



Appendix 8 email ATIC1462.pdf



Appendix 7 Fish Welfare Course InverFish



Appendix 5 Farm Welfare InspectiGovernment Fish Wel



Appendix 2 15112012_Meeting AGovernment



Appendix 1 Scottish Fish Wel



Provision of information ATIC1462

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

Sent: 22 September 2018 06:31

To: 'Enquiries APHA'

Subject: FOI re. AHVLA/APHA & Scottish Government discussions on farmed fish and Fisheries Health Inspectorate inspections

Further to ATIC1426, please provide information relating to discussions between the Scottish Government and AHVLA/APHA in relation to farmed fish and inspections of fish farms.

As background, please see attached APHA's letter dated 18 September 2018 and scroll down below for Scottish Salmon Watch's FOI request of 20 August 2018 and APHA's letter dated 16 August 2018.

APHA's letter of 18 September 2018 included:

After an extensive search of our paper and electronic records we can find no referrals from the Fish Health Inspectorate. It may help to provide a brief historical synopsis of the relationship between the Animal and Plant Health Agency (APHA) and the Fish Health Inspectorate (FHI).

Prior to 2012 we can find no records of any direct involvement of SVS/Animal Health/AHVLA/APHA with the FHI. Farmed fish are covered by the Animal Health and Welfare (Scotland) Act 2006 but not by Welfare of Farmed Animals (Scotland) Regulations 2010.

In 2012 Scottish Government asked AHVLA (now APHA) to develop capability to respond to welfare complaints regarding farmed fish. The intention was that AHVLA vets would develop an understanding of the context of fish farming, develop knowledge of the veterinary issues and be able to work with the FHI to ensure that effective action could be taken in cases of non-compliance with welfare legislation. AHVLA would contribute their expertise as regulators and experience of liaison with enforcement agencies if required.

As part of the AHVLA/APHA response, vets have been carrying out scheduled joint inspections with the FHI of fish farms since 2013.

As part of this FOI reply, please include specific details of the scheduled joint inspections with the FHI of fish farms since 2013.

Please also include correspondence (e.g. letters and emails) between the Scottish Government and AHVLA and APHA (including the correspondence alluded to in 2012 in APHA's letter of 18 September 2018) re. developing capacity to respond to welfare complaints regarding farmed fish.



Internal Review_Mr
Staniford.pdf



Provision of
information ATIC1426



Animal &
Plant Health
Agency

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

F 01932 357608

www.gov.uk/apha

Our Ref: ATIC1426

Don Staniford
{By Email}

18 September 2018

Dear Don Staniford

PROVISION OF REQUESTED INFORMATION

Thank you for your request for information salmon farm inspections which we received on 20 August 2018. Your request has been handled under the Freedom of Information Act 2000 (FOI).

The information you requested and our response is detailed below:

'Could you please provide copies of all reports sent by Fish Health Inspectors to APHA since 2006?'

After an extensive search of our paper and electronic records we can find no referrals from the Fish Health Inspectorate. It may help to provide a brief historical synopsis of the relationship between the Animal and Plant Health Agency (APHA) and the Fish Health Inspectorate (FHI).

Prior to 2012 we can find no records of any direct involvement of SVS/Animal Health/AHVLA/APHA with the FHI. Farmed fish are covered by the Animal Health and Welfare (Scotland) Act 2006 but not by Welfare of Farmed Animals (Scotland) Regulations 2010.

In 2012 Scottish Government asked AHVLA (now APHA) to develop capability to respond to welfare complaints regarding farmed fish. The intention was that AHVLA vets would develop an understanding of the context of fish farming, develop knowledge of the veterinary issues and be able to work with the FHI to ensure that effective action could be taken in cases of non-compliance with welfare legislation. AHVLA would contribute their expertise as regulators and experience of liaison with enforcement agencies if required.

As part of the AHVLA/APHA response, vets have been carrying out scheduled joint inspections with the FHI of fish farms since 2013.

Information disclosed in response to this FOI request is releasable to the public. In keeping with the spirit and effect of the FOI and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on GOV.UK, together with any related information that will provide a key to its wider context. No information identifying you will be placed on the GOV.UK website.

I attach an Annex which explains the copyright that applies to the information being released to you and contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact the Access to Information Team at the email address below or postal address at the top of this letter.

Yours sincerely

ACCESS TO INFORMATION TEAM

Email: enquiries@apha.gsi.gov.uk

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

Sent: 20 August 2018 16:25

To: 'APHA Corporate Correspondence'

Cc: 'norrie.stewart@apha.gsi.gov.uk'; 'MS.FishHealth@gov.scot'; 'SCD Wildlife Crime'

Subject: Re: Internal Review Request re: Complaint Vs Breaches of Animal Health & Welfare (Scotland) Act by Salmon Farms

Ms Roberts,

Re. your letter dated 16 August 2018 (attached).

You claim that:

Fish Health Inspectors report any significant case of poor welfare to the veterinarians in the Animal and Plant Health Agency, who are responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006.

Could you please provide copies of all reports sent by Fish Health Inspectors to APHA since 2006?

Finally, your letter states that:

Kind regards

APHA Corporate Correspondence

Animal and Plant Health Agency (APHA)

Website: www.gov.uk/apha | Twitter: [@APHAgovuk](https://twitter.com/APHAgovuk) | Facebook: [aphagov](https://www.facebook.com/aphagov)

Address: Executive Support and Correspondence Management Unit, APHA Weybridge, Woodham Lane, Addlestone, Surrey, KT15 3NB

From: APHA Corporate Correspondence

[mailto:APHA.CorporateCorrespondence@apha.gsi.gov.uk]

Sent: 25 July 2018 09:29

To: salmonfarmingkills@gmail.com

Cc: APHA Corporate Correspondence

Subject: FW: Internal Review Request re: Complaint Vs Breaches of Animal Health & Welfare (Scotland) Act by Salmon Farms

Dear Mr Staniford,

This is to acknowledge your request for an internal review.

APHA will endeavour to respond within 20 working days.

Regards

Norrie Stewart

Complaints & Correspondence Manager.

Executive Support & Correspondence Management

email: APHA.CorporateCorrespondence@apha.gsi.gov.uk

Animal and Plant Health Agency (APHA)

Email: norrie.stewart@apha.gsi.gov.uk

Website: www.gov.uk/apha | Twitter: [@APHAgovuk](https://twitter.com/APHAgovuk) | Facebook: [aphagov](https://www.facebook.com/aphagov)

Address: APHA, Room B1, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD.

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

Sent: 25 July 2018 08:25

To: 'APHA.CorporateCorrespondence@apha.gsi.gov.uk'

Cc: 'norrie.stewart@apha.gsi.gov.uk'; 'Jill.Barber@gov.scot'; 'directormarinescotland@gov.scot'; 'Charles.Allan@gov.scot'; 'Helen.McGregor@gov.scot'; 'Neil.Purvis@gov.scot'; 'Fiona.M.Watt@gov.scot'; 'scottish.ministers@gov.scot'; 'APHA.Scotland@apha.gsi.gov.uk'

Subject: Internal Review Request re: Complaint Vs Breaches of Animal Health & Welfare (Scotland) Act by Salmon Farms

Please consider this a formal request for an internal review.

As background, please find below Scottish Salmon Watch's letter dated 13 July 2018 (received by APHA on 16 July 2018) and please see attached APHA's reply dated 18 July 2018 (received via email on 24 July 2018).

APHA's reply is simply unacceptable and inadequate. By dismissing Scottish Salmon Watch's complaint and referring this serious matter back to Marine Scotland, APHA is ignoring its statutory responsibilities and abrogating its responsibilities to animal welfare.

APHA's letter of 18 July includes the 'helpful' recommendation that "it would be more appropriate to address your concerns to Marine Scotland":



Animal and Plant Health Agency
Woodham Lane
New Haw
Addlestone
Surrey
KT15 3NB
T +44 (0) 01932 341111
www.gov.uk/apha

Don Staniford
Director
Scottish Salmon Watch
salmonfarmingkills@gmail.com

(Sent by email)

18 July 2018

Dear Mr Staniford

Thank you for your correspondence, received 16th July 2018, addressed to the Animal & Plant Health Agency (APHA), on behalf of Scottish Salmon Watch, concerning disease and welfare of farmed salmon in Scotland.

Let me begin by saying that the APHA takes animal welfare very seriously and is determined where possible to enhance the UK's already high reputation in this respect. If APHA receive a specific welfare complaint about a fish farm, then a member of APHA staff, trained in fish welfare, will carry out an investigation accompanied by a Fish Health Inspector from Marine Scotland.

However, as the issues highlighted in your letter concern the methods used to control sea lice and gill disease, it would be more appropriate to address your concerns to Marine Scotland who will be able to provide a more comprehensive response to the issues you raise, since Fish Farms are the responsibility of the Fish Health Inspectorate of Marine Scotland who monitor farmed fish welfare as part of their inspection programme.

I hope you find this helpful.

Yours sincerely

A handwritten signature in blue ink, appearing to read "N Stewart", is written over a light blue horizontal line.

Mr N Stewart
Executive Support & Correspondence Unit
Animal & Plant Health Agency.

However, Scottish Salmon Watch understands that it is APHA not Marine Scotland who is the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. As [Scottish Salmon Watch's letter dated 13 July 2018](#) cited:

[A letter from Jill Barber, Aquaculture Health, Welfare and Innovation Manager, at the Scottish Government dated 9 July 2018](#) also identifies the [Animal and Plant Health Agency \(APHA\)](#) as the statutory agency responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006:

Fish Health Inspectors will report any significant case of poor welfare to Animal and Plant Health Agency (APHA) veterinarians, responsible for overseeing the requirements of the Animal Health and Welfare (Scotland) Act 2006. If APHA suspect that an offence may have been committed under the Act, there are various enforcement options including issuing advice, warning letters and care notices, and the option of passing evidence for a potential prosecution to the Procurator Fiscal to consider.

This letter is available online in full via [Legal Complaint Vs Breaches of Animal Health & Welfare \(Scotland\) Act](#)

APHA's failure to investigate this serious welfare matter - and follow up on the extensive evidence presented in [Scottish Salmon Watch's legal complaint of 13 July 2018](#) - therefore represents a dereliction of APHA's statutory duty.

As further background, you should be aware that on 10 July 2018 Scottish Salmon Watch filed FOIs with both the Scottish Government and APHA in relation to any reports to APHA by Marine Scotland in relation to farmed salmon (including any correspondence with APHA on the issue of salmon farms - including enforcement, advice, warning letters, care notices and evidence passed to the Procurator Fiscal).

Scottish Salmon Watch is of the view that Marine Scotland, despite the damning evidence of welfare abuse cited in the [FHI Case Information reports](#) (dating back to 2013), has failed to report any cases to APHA (this view will obviously be tested when the FOI replies are received).

Moreover, Scottish Salmon Watch maintains that the Scottish Government (including Marine Scotland) has a vested interest in protecting salmon farming from public scrutiny (in concert with [the Scottish Government's stated support to double salmon farming production by 2030](#)) rather than protecting the welfare of farmed fish.

Hence, it is surely incumbent upon APHA to investigate the matter as per its statutory responsibilities via the Animal Health and Welfare (Scotland) Act 2006. Asking and expecting Marine Scotland to police itself is akin to asking a fox to check the chicken coop.

Finally, Scottish Salmon Watch has recently obtained disturbing and damning evidence of welfare abuses inside a salmon farm in Scotland during July 2018 (i.e. the welfare abuse is ongoing, increasing and demands urgent investigation). Photographic evidence from 14 & 22 July 2018 includes tail and fin damage, deformed fish and lice damage:









[I can share high resolution photos and video footage via We Transfer]

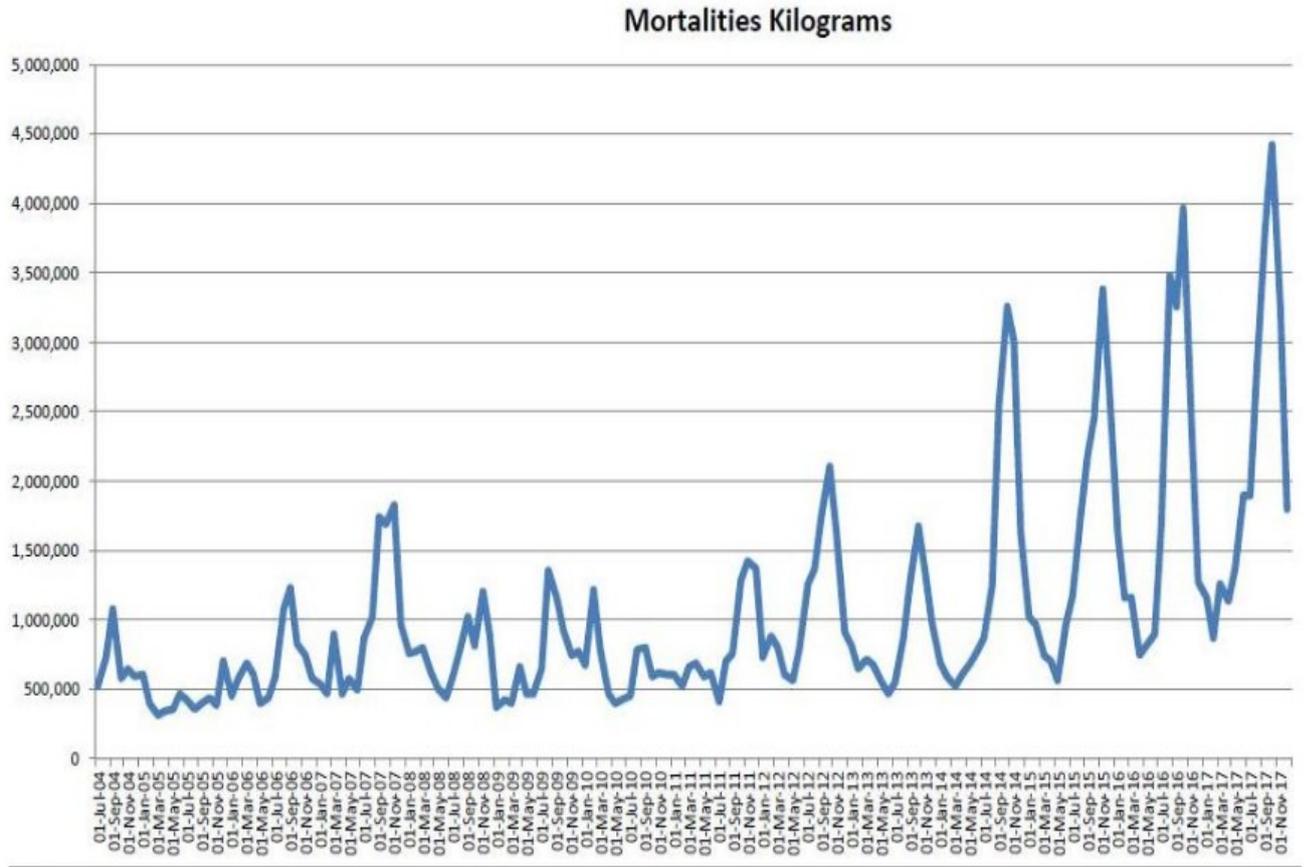
As [Scottish Salmon Watch's letter of 13 July 2018](#) concludes:

With mass mortalities, infectious disease and welfare problems [expected to peak in late Summer and early Autumn](#), Scottish Salmon Watch recommends that Police Scotland and APHA conduct targeted inspections at salmon farms reaching maximum biomass and in the last few months of their harvest cycle.

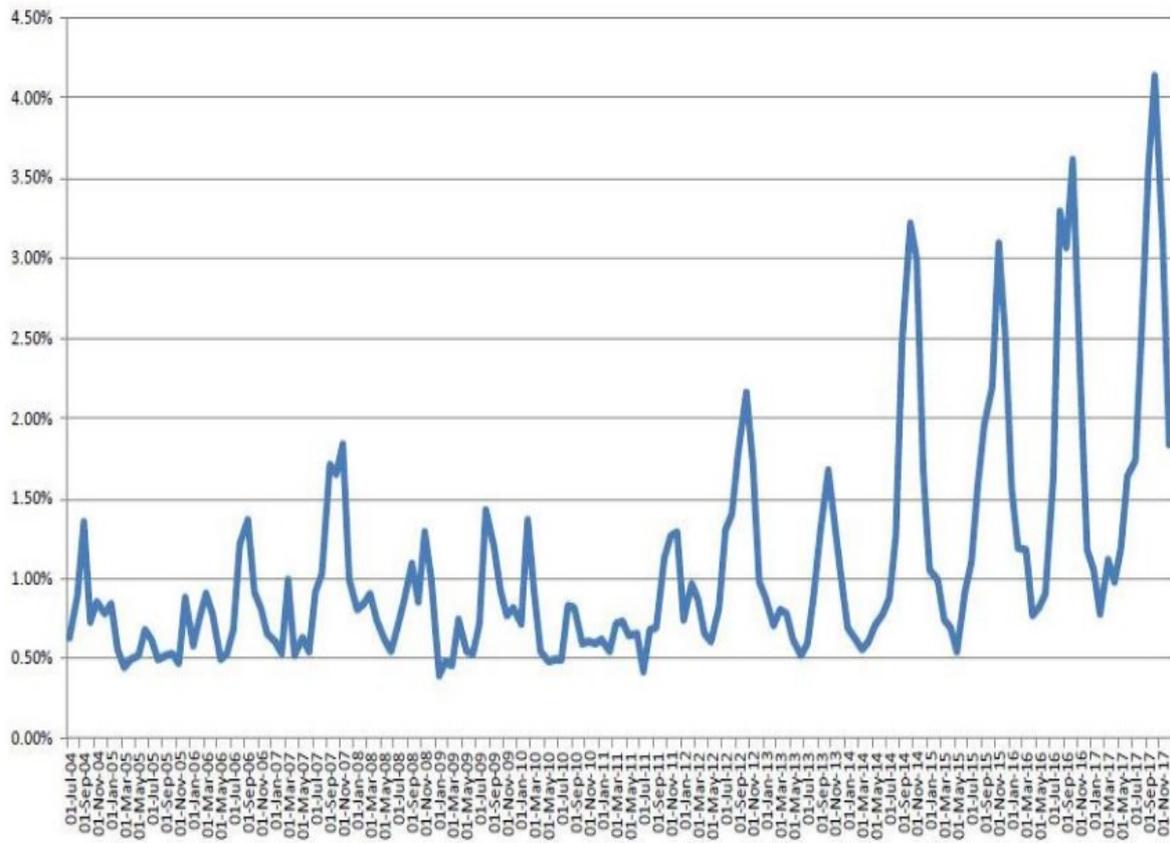
For example, [of the 20 worst salmon farm sites for mortalities \(by weight and month\) between 2002 and 2017 17 occurred in September, October, November and December:](#)

1	Year	Mortalities (Kg)	Submitted By	Site Name	Local Authority
2	01-Dec-15	640812	Grieg Seafood Shetland Ltd	Cole Deep	Shetland Islands
3	01-Feb-10	564900	Rysa Farm Salmon	Pegal Bay	Orkney Islands
4	01-Oct-17	527936	Cooke Aquaculture Scotland	Stead of Aithness	Shetland Islands
5	01-Oct-13	494652.3731	Marine Harvest (Scotland) Ltd	Portnalong	Highland
6	01-Nov-17	487622	The Scottish Salmon Company Ltd	Druimyeon Bay	Argyll and Bute
7	01-Apr-02	423165	Scottish Sea Farms Ltd	Sand Sound, Bixter	Shetland Islands
8	01-Nov-17	422946	Cooke Aquaculture Scotland	Stead of Aithness	Shetland Islands
9	01-Oct-16	396461	The Scottish Salmon Company Ltd	Trilleachan Mor	Eilean Siar
10	01-Oct-14	392856.0973	Marine Harvest (Scotland) Ltd	Greshornish	Highland
11	01-Oct-14	361742.2665	Marine Harvest (Scotland) Ltd	Marulaig Bay	Eilean Siar
12	01-Oct-12	340000	Hjaltland Seafarms Ltd	Setterness South	Shetland Islands
13	01-Nov-14	330998.5855	Marine Harvest (Scotland) Ltd	Eilean Raineach	Eilean Siar
14	01-Aug-02	326520	Lewis Salmon Ltd	Arbhair	Eilean Siar
15	01-Sep-17	319615	The Scottish Salmon Company Ltd	Tuath (Rubha na Gall)	Argyll and Bute
16	01-Aug-08	317940	Scottish Sea Farms Ltd	Fiunary	Highland
17	01-Nov-14	294281.1441	Marine Harvest (Scotland) Ltd	Greshornish	Highland
18	01-Oct-11	291056	The Scottish Salmon Company Ltd	St Molios	North Ayrshire
19	01-Sep-16	289180.2091	Marine Harvest (Scotland) Ltd	Soay Sound	Eilean Siar
20	01-Nov-14	285003.843	Marine Harvest (Scotland) Ltd	Scotasay	Eilean Siar
21	01-Oct-16	283830.0231	Marine Harvest (Scotland) Ltd	Noster	Eilean Siar

Notice the spikes in mortalities in late Summer and Autumn:



Monthly morts as % of monthly biomass



Please note that on 1 September 2018, new biomass data for the second quarter of 2018 (April to June) goes online via [Scotland's Aquaculture web-site](#). Police Scotland and APHA could use this data to work out which salmon farms in Scotland are reaching maximum biomass and nearing the end of their production cycle (which is [now an average of 16 months compared to an average of 20 months a decade ago](#)) when welfare problems are at their worst.

Please therefore reconsider APHA's initial reply and investigate [Scottish Salmon Watch's legal complaint as originally requested on 13 July 2018](#) and demanded via APHA's statutory responsibilities under the Animal Health and Welfare (Scotland) Act 2006.

Please acknowledge receipt of this internal review request.

For the sake of transparency, I have also copied in APHA's Norrie Stewart, APHA Scotland, Jill Barber of the Scottish Government, the Director of Marine Scotland, the head of the Marine Laboratory in Aberdeen, Scottish Ministers and other Scottish Government staff involved in Fisheries Health Inspectorate visits to salmon farms.



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Agency

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www.gov.uk/apha

Don Staniford
Director
Scottish Salmon Watch
salmonfarmingkills@gmail.com

(Sent by email)

18 July 2018

Dear Mr Staniford

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However, as the issues highlighted in your letter concern the methods used to control sea lice and gill disease, it would be more appropriate to address your concerns to Marine Scotland who will be able to provide a more comprehensive response to the issues you raise, since Fish Farms are the responsibility of the Fish Health Inspectorate of Marine Scotland who monitor farmed fish welfare as part of their inspection programme.

I hope you find this helpful.

Yours sincerely

Mr N Stewart
Executive Support & Correspondence Unit
Animal & Plant Health Agency.

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

Sent: 16 July 2018 06:59

To: 'apha.corporatecorrespondence@apha.gsi.gov.uk'; 'Enquiries APHA'

Subject: Complaint Vs Breaches of Animal Health & Welfare (Scotland) Act by Salmon Farms

[Complaint Vs Breaches of Animal Health & Welfare \(Scotland\) Act 2006 by Salmon Farms](#)

Scottish Salmon Watch would like to [formally file a complaint](#) against the salmon farming companies Marine Harvest, Scottish Sea Farms, the Scottish Salmon Company, Grieg Seafood, Cooke Aquaculture and Loch Duart for systematic breaches of the [Animal Health and Welfare \(Scotland\) Act 2006](#) - in particular in relation to [Unnecessary Suffering](#) (Section 19), [Cruel Operations](#) (Section 21) and [Ensuring Welfare of Animals](#) (Section 24).



The horrific images reveal severe lice infestation eating into the heads of farmed salmon, deformed spines, lesions, adhesions, deformed hearts, anorexia, petechial haemorrhages, enlarged spleens, diseased gills, cataracts and even salmon with no eyes.





Diseases, viruses, bacteria and pathogens reported alongside the photos include Salmonid Alpha Virus, Bacterial Kidney Disease, Pancreas Disease, Cardiomyopathy Syndrome, Heart & Skeletal Muscle Inflammation, Salmon pox virus, Vibrio, Flavobacterium, Moritella viscosa (Winter ulcer), Amoebic Gill Disease, Neoparamoeba perurans, Paranucleospora theridon (syn. Desmozoon lepeophtherii), Parvicapsula pseudobranchicola, Ichthobodo species, Branchiomonas, Costia, Candidatus Syngnamydia salmonis and Pasteurella skyensis.



Scottish Salmon Watch believe that there is a strong argument to be made for a case to be filed via the Procurator Fiscal. Please read a dossier of photographic and case evidence via: [Hard Evidence - Photos of Diseased & Deformed Scottish Salmon](#)

Our complaint (read in full [online here](#)) details evidence of:

- 1) Photographs via Fish Health Inspectorate inspections**
- 2) Disease reports obtained via Freedom of Information & FHI Case Information**

3) Mass mortality reports obtained via Freedom of Information & SEPA data

For further details of the welfare nightmare on Scottish salmon farms please read:

[Hard Evidence - The Welfare Nightmare of Scottish Salmon Farming](#)
[Campaign group to file legal challenge against Scottish salmon farms' use of Thermolicer](#)
[Daily Mail: "Calls to ban salmon farms' lice treatment"](#)
[Press Release: "Ban Water Torture on Scottish Salmon Farms"](#)
[EXPOSED: Gruesome Photos of Deformed & Diseased Scottish Salmon](#)
[Hard Evidence - Photos of Diseased & Deformed Scottish Salmon](#)
[Horror photos of farmed salmon spark legal threat](#)
[GRAPHIC: More Proof That Fish Are Suffering in Food Industry \(Photos\)](#)
[New photos expose shocking welfare issues on Scottish salmon farms](#)
[Letter to Scottish Ministers re. Welfare Abuses at Scottish Salmon Farms](#)
[Deaths, Deformities & Welfare Abuse at Scottish Salmon Farms - Breach of the Animal Health & Welfare \(Scotland\) Act?](#)
[EXPOSED: Early Harvesting at Scottish Salmon Farms Due to Disease & Mortalities](#)
[Hard Evidence: Fast-Tracking Disease-Ridden Scottish Salmon](#)
[Letter to the Cross-Party Group on Animal Welfare: Thermoliced to Death](#)
[Hard Evidence: Dossier of Data on Lice, Diseases & Mortalities at Scottish Salmon Farms](#)
[The Herald: "Video: Disease concern as Scots salmon farmers' produce "stomach-churning" record levels of fish deaths"](#)
[Scottish Salmon's Mort Mountain Leaps Over 10 Million - FOI reveals 2.3 million dead salmon at Marine Harvest farms in 2017](#)

Scottish Salmon Watch asks that the welfare abuses of Scottish salmon farms operated by Marine Harvest, the Scottish Salmon Company, Scottish Sea Farms, Grieg Seafood, Cooke Aquaculture and Loch Duart are investigated further with a view to a prosecution via the Procurator Fiscal.

The Fisheries Health Inspectorate '[Case Information](#)' dates back to [2013](#) and is now available for the first quarter of [2018](#). This is a useful resource along with documents accessed via FOI.

However, Scottish Salmon Watch firmly believes that the damning photographic evidence [published by The Ferret in June 2018](#) and case information via Fisheries Health Inspectorate reports are merely the tip of an iceberg. Enhanced inspections and an increased number of inspections at salmon farms [towards the end of their harvest cycle](#) would surely uncover further damning evidence of welfare abuse.

With mass mortalities, infectious disease and welfare problems [expected to peak in late Summer and early Autumn](#), Scottish Salmon Watch recommends that Police Scotland and APHA conduct targeted inspections at salmon farms reaching maximum biomass and in the last few months of their harvest cycle.

Please note that on 1 September 2018, new biomass data for the second quarter of 2018 (April to June) goes online via [Scotland's Aquaculture web-site](#). Police Scotland and APHA could use this data to work out which salmon farms in Scotland are reaching maximum biomass and nearing the end of their production cycle (which is [now an average of 16 months](#)

[compared to an average of 20 months a decade ago](#)) when welfare problems are at their worst.

A paper copy of our complaint in full - 108 pages - was mailed on Friday (13 July 2018) and should arrive this morning in the post by recorded mail. You can also read a copy in full [online here](#)



[Police Scotland](#)
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[Animal & Plant Health Agency](#)
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apha.corporatecorrespondence@apha.gsi.gov.uk and enquiries@apha.gsi.gov.uk

13 July 2018

Dear Sir/Madam,

Breaches of the Animal Health & Welfare (Scotland) Act 2006 by Salmon Farms

[Scottish Salmon Watch](#) would like to formally file a complaint against salmon farming companies in Scotland for systematic breaches of the [Animal Health and Welfare \(Scotland\) Act 2006](#) - in particular in relation to [Unnecessary Suffering](#) (Section 19), [Cruel Operations](#) (Section 21) and [Ensuring Welfare of Animals](#) (Section 24).

Scottish Salmon Watch believe that there is a strong argument to be made for a case to be filed via the Procurator Fiscal. Please read a dossier of photographic and case evidence via: [Hard Evidence - Photos of Diseased & Deformed Scottish Salmon](#)



