

Scottish Salmon Watch, 27 May 2021

[Scottish Salmon's Illegal Graveyard for Millions of Diseased Fish](#)



- Video lifts lid on millions of disease-ridden farmed fish dumped in Outer Hebrides
 - Whiteshore Cockles 'graveyard' "stinks to high heaven" & "must be shut down now"
 - EU loophole allowing dumping in landfill should be closed immediately say campaigners
 - "the derogation cannot go on indefinitely" admitted the Scottish Government in 2017
 - "Odours can be prevalent within the local community," admit Whiteshore Cockles.
- "There is always the risk smells dispersing widely if the wrong weather conditions prevail"

Stomach-churning [video footage](#) of Scottish salmon dumped illegally in the Outer Hebrides lifts the lid on how millions of diseased farmed salmon are still going to landfill [despite European laws introduced in 2003 preventing burial of mortalities](#). Whiteshore Cockles in North Uist was granted an EU derogation in 2016 but the Scottish Government conceded in 2017 that "the derogation cannot go on indefinitely". A pledge to stop dumping dead salmon made in 2018 by [Angus MacDonald \(owner of Whiteshore Cockles\)](#) on the BBC's 'One Show' has failed. Campaigners are now [calling for landfill burial of dead salmon to be halted immediately](#) [1].



Read more via today's Times: "[Islanders raise a stink over vast salmon graveyard](#)"

“Millions of salmon die each year on Scotland’s factory farms due to infectious diseases, viruses, pathogens, lice infestation and welfare problems,” said Don Staniford, [Director of Scottish Salmon Watch](#). “Salmon farming companies such as Mowi (Marine Harvest), The Scottish Salmon Company and Loch Duart have been illegally dumping millions of diseased salmon at Whiteshore Cocks for nearly two decades. Locals complained about the bad smell back in 2005 but the Scottish Government and SEPA turned their nose up to continued complaints and a six month EU derogation in 2016 expired nearly five years ago. Shoppers and tourists alike will be shocked to see mass graves of disease-ridden Scottish salmon lying near EU protected sites. Please boycott Scottish salmon – my family and I avoid it like the proverbial plague.”



“More than twenty years after the BSE crisis it’s extremely concerning to learn that massive quantities of diseased fish, many dead from viruses, are still being dumped in open landfill,” [said Ewan Kennedy who filed a complaint with the European Commission in 2013 on the UK’s failure to follow the law on the disposal of diseased salmon](#). “It’s also concerning that post Brexit, despite regulations remaining technically in force, there’s no possibility of the UK Government facing the threat of enormous annual fines that brought about compliance in 2016.”

Whiteshore Cocks admitted via a [non-technical planning statement dated 15 January 2021](#):

“The current system of burying the fish waste has one major drawback. The fish are all kept outside whilst the burial area is being prepared and if there is a south west wind then odours can be prevalent within the local community. The pits are covered with several layers of seaweed to allow for the natural regeneration of the ground but again, till the waste has settled, there is always the risk smells dispersing widely if the wrong weather conditions prevail.”

Western Isles Council (Comhairle nan Eilean Siar) has failed to respond to a Freedom of Information request filed over six months ago. Scottish Salmon Watch has [appealed to the Scottish Information Commissioner](#) to force disclosure of documents relating to the illegal dumping of millions of diseased salmon by salmon farms at Whiteshore Cockles [2].



In September 2018, the [BBC 'One Show' featured video footage of the Whiteshore Cockles salmon dump](#) including an interview with Angus MacDonald who claimed: "I'm not going to continue burial for much longer because I have a new state-of-the-art unit coming in".



Salmon Farming Expose on the BBC One Show - September 2018

In October 2019, Kate Forbes (Cabinet Secretary for Finance) [visited Whiteshore Cockles in her then role as Cabinet Secretary for Digital Economy](#).



It's not clear if the Scottish Minister was given a guided tour of the mass graves (pictured in the photo behind [Angus Alick MacDonald – the owner of Whiteshore Cockles](#)) or asked about the continued illegal dumping of diseased salmon.



“Whiteshore Cockles have delayed installing a fish drier for nearly a decade and the authorities have been complicit in covering up the dumping of millions of diseased farmed salmon in breach of EU law,” continued Staniford who [visited the landfill site in North Uist on 3 May 2021](#).



“Even worse, in 2017 mass mortalities from Harris and Lewis added to the carcasses of salmon dumped from the Southern Isles (North Uist to Barra). Even with planning permission granted by Western Isles Council in March, it could be years before a new fish drier is actually operational. Scottish salmon’s secret graveyard stinks to high heaven and must be shut down now!”



A Decade of Delays & Broken Promises by Whiteshore Cockles

It seems that the authorities have turned a blind eye to the continued dumping of diseased farmed salmon in landfill at Whiteshore Cockles for well over a decade and a fish drier is still not operational (planning permission was only [granted by Western Isles Council on 30 March 2021](#) and it is not known if the Scottish Environment Protection Agency or Marine Scotland have even received the necessary pollution and waste water permit applications) [3].

In November 2013, a [Scottish Government report from the Fisheries Health Inspectorate](#) (relating to an inspection of The Scottish Salmon Company's salmon farm at North Uiskevagh) cited: "Current mortality disposal via Whiteshore Cockles Ltd, site is looking at anaerobic digestion in the longer term".

In November 2015, [Ian Cox of the Scottish Government wrote with respect to continued dumping at Whiteshore Cockles](#): "Regardless of what we decide, enforcement will be from the Western Isles Council who have been reluctant to do anything about this site in the past".

In November 2015, Whiteshore Cockles wrote to Western Isles Council on the 'expected timescale' of the Fish Waste Drier (to replace burial of morts) claiming that the equipment could be place by the end of 2015 but requesting an extension of the EU derogation. "We would therefore request that an application be made for a derogation to extend the deadline for the end of the burial process at the Bayhead site to September 2016," [wrote Whiteshore Cockles](#). "The extension if granted should ensure that the new process of treating the fish mortalities is fully compliant and operational".

"This requests (sic) feels like they have delayed to the last minute, albeit due to waiting for information about possible funding," [wrote Ian Cox of the Scottish Government in another email in November 2015](#). "It does not feel right to me to allow Whiteshores to continue to bury fish waste at their site".

In January 2016, [Kenny MacLeod of Western Isles Council wrote to the Scottish Government](#): "I was wondering, from our enforcement hat on, what's happening with Whiteshores derogation request? I suspect they are still using the site for burying morts."

In June 2016, a [Scottish Government report from the Fisheries Health Inspectorate](#) (relating to an inspection of Marine Harvest's salmon farm at Hellisay cited: "Morts currently going to landfill, Whiteshore Cockles. They are waiting for the installation of a site incinerator".

A [redacted email in July 2016](#) (believed to be from Whiteshore Cockles) to Ian Cox of the Scottish Government stated: "We are starting the infrastructure work next week and hope to get the drier order finalised by the end of the month....We have told all the fish farms that our deadline to be fully operational is the end of the year....Does Brexit affect anything?"

"Thanks for the update and that the timeline for progressing the works remains on track to be fully operational by the end of the year," [wrote Ian Cox of the Scottish Government in reply in July 2016](#). "In terms of the implications of the EU Referendum it is still business as usual and

this is the usual SG line – “the UK remains a full member of the European Union until Art. 50 negotiations conclude, and therefore currently remains subject to all responsibilities and obligations of membership”. Appreciate that Brexit may change things but it really is too soon to speculate at this stage”.

In December 2017 ([following a BBC One Show feature on mass mortalities and waste disposal called ‘The Dead Salmon Run’](#)), a [redacted email \(believed to be from Whiteshore Cockles\) to the Scottish Government stated](#): “Due to the current publicity regarding the transportation of salmon morts on the mainland I am giving the fish farms a report on our drier project and thought I should keep you updated. Our infrastructure is now completed and the construction of the building to hold the plant is well under way and will be completed by the New Year. Our drier system will be up and running by April hopefully with the commission being completed by the summer. The fish farms in Lewis and Harris are keen for us to treat their mortalities due to the recycling process and the extra quantity has meant that we have had to recalculate all our figures and upgrade the proposed facility to include a biomass burner. This has taken an age to arrange and the extra costs which are extreme have meant that we have had to rearrange finance which has also been a slow process”.

In December 2017, [Ian Cox of the Scottish Government replied](#): “Are you keeping in regular contact with Western Isles Council too? It is important that we progress this as quickly as possible as the derogation cannot go on indefinitely”.

“Yes I have updated all the interested parties,” [wrote a redacted email \(believed to be from Whiteshore Cockles\) to Ian Cox of the Scottish Government in December 2017](#). “Everything should be up and running by May/June. I have contacted SEPA and Vivien Taylor in Inverness so we can start all the paperwork for any emissions (only purified water) and the licence etc that Vivien needs to approve. It has taken us three years to get everything confirmed but thankfully we are now on the homeward run.....The bad publicity that the ‘One Show’ generated last week has highlighted the transport issues which makes our ‘local solution for a local problem’ even more important. Thanks again for your patience and will keep you updated”.

[A search of [SEPA’s Compliance Assessment Scheme](#) finds no documents relating to Whiteshore Cockles – although there is currently only data available for 2018 – and [SEPA’s ‘Scottish Pollutant Release Inventory’ is currently listed as offline due to “a significant cyber attack which has affected our internal systems and communications”](#)].

“I am just updating all interested parties on our ongoing Fish Drier Project,” [wrote a redacted email \(believed to be from Whiteshore Cockles\) to Ian Cox of the Scottish Government in May 2018](#). “We have now completed all the infrastructure i.e. new road, over an acre of concrete laid for biosecurity isolation units.....The design/size of the drier unit and ancillary equipment has now been completed and agreed with the supplier and we are just awaiting confirmation on the final costs before ordering for delivery which will be as soon as possible. This has been a huge and long running project which has grown ‘arms and legs’ since we decided to go with the Drier system too years ago. All the major fish farms are looking at how to deal with their mortalities in the quickest and most environmentally friendly way due to some recent bad publicity.....They all agree that a local solution for a local problem is the best way to go with our recycling plant

helping the local economy in several ways it is a win win situation for the community and the fish farm operators.....I am sure you will be delighted (as we all are) that we have reached the final hurdle with the winning post now in sight”.

Throughout 2018 (and it seems during 2019, 2020 and still during 2021), mass mortalities from the Scottish Salmon Company’s disease-ridden salmon farms in Loch Roag continued to be dumped at Whiteshore Cockles. Here’s a photo [published by the Scottish Government’s Fish Health Inspectorate](#) via an inspection visit to Vuia Mor salmon farm in Loch Roag in August 2018:



‘Case Information’ [published by the Scottish Government’s Fish Health Inspectorate](#) reported for a site inspection of Loch Duart’s Lochmaddy salmon farm in June 2020 that work installing a fish dryer and biomass machinery at Whiteshore Cockles “has temporarily stopped” but that “it is hoped that the plant will be fully operational by winter this year, or early 2021”:

Case No:	2020-0233	Date of visit:	18/06/2020
Time spent on site:	1 Hour	Main Inspector:	[REDACTED]
Site No:	FS0853	Site Name:	Lochmaddy
Business No:	FB0398	Business Name:	Loch Duart Ltd
How are mortalities disposed of?	[REDACTED]		
If other detail:	White shore cockles		

Mortalities are disposed of via landfill at White Shore Cockles. It has recently been refitted to accommodate dryer and biomass machinery to recycle fish waste into fuel and is currently at the stage of commissioning, however work has temporarily stopped. It is hoped that the plant will be fully operational by winter this year, or early 2021.

Planning documents [publicly available online via Western Isles Council](#) in relation to Whiteshore Cockles included multiple 'questions arising from submissions' dated 4 March 2021:

19/00288/PPD, 20/00007/PPD and 21/00047/SCR_L - Whiteshores

Questions arising from submissions

BAT Assessment and Odour Impact Assessment (OIA)

1. The OIA indicates, in para 3.1, that it considers emissions from the biomass boiler and the biofilter. Has any assessment been undertaken for the pre-processing storage of waste on site, or the post-processing storage of fish meal and fish oil?
2. Is it proposed that all pre-processed waste would be stored within the fish mort storage building on site (planning application reference 20/00007/PPD)?
3. What would be the maximum quantity of pre-processed waste material stored on site?
4. Would different facilities exist for tub and skip storage?
5. How frequently are tankers envisaged to visit the site? What is their capacity? How would this waste be stored within the site?
6. Given that the supply is variable, what contingency arrangements would be in place for situations where storage facilities are at capacity?
7. How are the waste products proposed to be transferred from the storage facilities to the sealed reception pit?
8. How would the waste material be transferred from the sealed reception pit into the processing building?
9. The documents indicate that the process would be sealed. At what point in the process would it become sealed?
10. Section 2.1 of the BAT Assessment makes reference to Figure 2 and Appendix B and C. However, the appendices provided do not reflect the details referred to within this section. There is no process diagram included within the submissions. Please could this be provided.
11. The reports refer to the use of a biofilter for the processing building and the fish mort storage building? Please can details of this provision be clarified.
12. The reports also refer to retaining the buildings at sub atmospheric pressure, in order to reduce odour. How is this proposed to be achieved?

And:

16. What is the maximum daily quantity of fish waste proposed to be processed on the site?
The non-technical planning statement indicates a capacity of 32 tons [tonnes?] of waste in 24 hours. The BAT Assessment indicates a continuous operation that can process up to 2 tonnes per hour, or 48 tonnes per day.
17. At what point in the process, and how, would cleaning be undertaken?
18. Additional drainage and waste water storage arrangements have not been provided. Please can you confirm how the wash-down water, used for cleaning and to disinfect the emptied tubs and skips, would be stored on site? What would be the capacity of the effluent tanks? How would this waste water be disposed of?
19. Where would the disinfecting process for the tubs and skips take place within the site? Would this part of the site be bunded? How is the resulting odour from this part of the process proposed to be managed?

And:

22. The details provided indicate that some 48 tonnes of waste could be processed on site. What would this translate to in terms of the outputs of fish meal and fish oil?
23. The details indicate that some 250kg/hour of fish meal would be used as fuel for the biomass plant within the site. What would be the residual quantity of material produced and not used within the site?
24. Where and how would the fish meal and fish oil be stored within the site? What are the maximum storage quantities envisaged? Would the storage containers be sealed? How would the products be transferred into the storage containers?
25. How would the excess fish meal and the fish oil be transported from the site and in what type of container? How frequently would this occur?
26. The Odour Impact Assessment section 4.2 refers to the process as being 'moderately offensive'. This appears to contradict the identification of the proposal, as involving the most offensive odours, within the odour benchmark level in section 2.5 of the report. In addition, section 4.2 refers to the proposal as the revised AD facility. Please can these discrepancies be clarified.

The planning application also included a [document dated 3 March 2021](#):



59300-01 R1 v2

Report

Appraisal of Best Available Techniques

Whiteshore Cockles Fish Morts Processing Facility

Whiteshore Cockles Ltd

3 March 2021

The report included:

Purpose of the report

Atmos Consulting Limited ('Atmos') has been commissioned by Whiteshore Cockles Ltd ('WSC') to undertake a Best Available Techniques (BAT) assessment in relation to a proposed Fishmeal Processing Plant at Bayhead, Isle of North Uist.

Operation of the processing plant requires a Permit under Part 'A' of Schedule 1 to the Pollution Prevention and Control (Scotland) (PPC) Regulations 2012 issued by the Scottish Environment Protection Agency (SEPA). Currently SEPA have a standing objection to an application for planning permission to Comhairle nan Eilean Siar (CnES) in for an increase in the roof height for the building on site.

Although not cited in as a reason for the objection, SEPA have specifically requested a BAT assessment for the treatment of odour emissions from the facility.

This report is intended to determine BAT for the installation, specifically in relation to management of odour.

Background

WSC is a salmon mortality waste handler currently operating a landfill facility for the burial of salmon farm mortalities (morts) (classed as category 2 animal by-products (ABPs)) under a derogation implemented by the Scottish Government which allows the disposal of ABPs by burial under official supervision in remote areas.

The aquaculture industry is, however, now required to ensure that they dispose of their waste in accordance with the Animal By-Products (Enforcement) (Scotland) Regulations 2013 (as amended) (ABP Regulations) i.e. it can no longer be disposed of in a landfill site.

WSC was granted planning consent by Comhairle nan Eilean Siar (CNES) in 2004 (planning reference: 04/00670) to construct and operate a facility for the burial of morts from fish farms in the Uists and Barra. In 2012 further planning consent was granted (planning reference 12/00020) to remove the restriction on the geographical source of the morts.

WSC is now seeking to implement a new drying system for the processing of the mortalities which would provide an alternative to landfilling and ensiling of putrescible fish wastes. In 2014, planning consent was granted to WSC (planning reference 14/00333) to construct and operate a facility for the drying of fish morts at the existing waste handling site.

Construction of the facility progressed but operation of the new drying facility has not yet commenced and following design evolution a further planning application was made in 2019 to extend the roof of existing building to accommodate a biomass boiler and flue (planning reference: 19/00288) and in January 2020 (planning reference: 20/00007) to construct a covered fish morts reception building.

The report continued:

Accessed from the North West via tracks and an unclassified road through Balemore from the A865 road the site is close to the shoreline and is surrounded by crofting fields, dunes and machair, with the Mean High Water Mark c. 60m to the south east at its closest point. The nearest settlement is the village of Balemore, c. 600m to the North of the site.

The North Uist and Islands Ramsar/Special Protection Area (SPA), the North Uist Special Area of Conservation (SAC) and Baleshare and Kirkibost Site of Special Scientific Interest (SSSI) lie approximately 3.5km to the north east of the site and 1.2km to the south east on Kirkibost Island.

And:

Delivery and Storage

Collection & Delivery

Fish mortals will be delivered by road into a sealed receiving pit to await processing. Only 'fresh' (i.e. not ensiled) mortalities will be accepted.

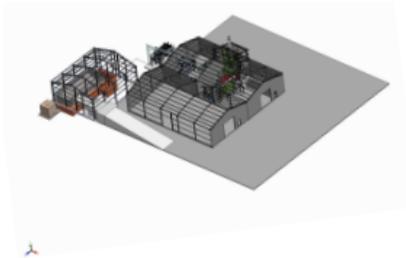
Fish mortals will be received in three types of containers:

- **Tubs.** These hold approximately 800kg of fish mortals (depending on age and condition) and have a liner attached to the inside and a lid which is kept in place by strong cable ties. All the Southern Isles fish farms use this form of transport apart from Loch A Liap (which uses a sealed skip). This has been the norm for the past fifteen years or more. The tubs are easily loaded and transported although have a greater tendency to emit an odour. They are disinfected before despatch from the fish farm.
- **Sealed Skips.** These are manufactured specifically to WSC design for the storage and transportation of the mortals. They emit no odour and there is a fortnightly collection schedule of for each fish farm site, irrespective of the quantity of fish inside, unless the manager requests an early uplift. The skip is transported by a dedicated lorry and is disinfected and sprayed with a deodoriser before leaving the fish farm site for the ferry journey. This system has been operating for eighteen months (since July 2018) and in that time there have been no complaints from the general public in relation to odour. The capacity of these skips is approximately 12 tons.
- **Tankers.** When a major problem arises at a fish farm site they can call in a dedicated boat from Ferguson Transport which has two tankers aboard which the mortalities can be pumped directly from the cages. The boat then transports the fish to a slipway in North Uist from where two artic units transport the tanker to the site. The tankers would then be tipped directly into the processing building before being cleaned, disinfected and returned to the boat.

Unloading

Tubs will be loaded into the pit with a telehandler immediately upon delivery to the site. Skips will be tipped into the pit from the ramp immediately if there is storage room available in the pit. The fish mortals can be anything from a few hours to weeks old depending on many factors at the fish farms, including weather and availability of divers. The tubs are most likely to emit odour and will be given priority for processing. The sealed skips are completely sealed and sprayed with a deodoriser on collection, therefore representing less of an odour risk and are given lesser priority for processing.

A [non-technical planning statement from Whiteshore Cockles dated 15 January 2021](#) detailed:



WHITESHORE COCKLES LTD

Bayhead, Isle of North Uist.

Tel: 01876510724

macdonaldfirms@gmail.com

INFORMATION TO ACCOMPANY PLANNING APPLICATIONS: 19/00288/PPD AND 20/00007/PPD

History

For the past sixteen years Whiteshore Cockles Ltd have been accepting salmon morts at their site in Bayhead, North Uist. To this date the waste has been buried on the five acre site and this process has been monitored by the CNES Animal Health Dept , the Environmental Health Dept and SEPA. Up to 2017 the morts were accepted from the Southern Isles (North Uist to Barra) but since then we have been servicing all the sites within the Western Isles.

In 2016 we informed the Scottish Government that we were intending to install an innovative and unique drying system to process the fish which would involve recycling the waste material into reusable products. The design and manufacture of all the plant has taken four years, and has involved a huge financial investment from the company , with various components being supplied from around Europe. The infrastructure to house all the plant was completed in 2019 but unfortunately Covid -19 and changes and additions to the machinery design and operation, which SEPA have insisted on, have delayed the completion of the project. If government restrictions allow then we would hope to have everything completed on site by spring 2021. This would then just require the necessary permits and licences to be granted for the company to begin using the new process.

Benefits to the Local Economy , Environment and Community

The new *modus operandi* will employ up to ten full time staff with the senior positions enjoying high salaries in Uist terms. It will also support two full time posts and two part time positions within our transport partners operation. This will make Whiteshore Cockles Ltd one of the largest employers on North Uist. We have secured contracts with all the local fish farms to service their waste requirements and this will ensure their continued long term commitment to the islands economy. These new posts will help to stabilise the local community and the services within that their income will support.

The current system of burying the fish waste has one major drawback. The fish are all kept outside whilst the burial area is being prepared and if there is a south west wind then odours can be prevalent within the local community. The pits are covered with several layers of seaweed to allow for the natural regeneration of the ground but again, till the waste has settled, there is always the risk of smells dispersing widely if the wrong weather conditions prevail. The new operation will ensure that no odours or noise will be noticeable within the local perimeter, as the waste will be housed in a sealed compartment from whenever it is delivered to our site and all the machinery will be operating within acceptable noise parameters. By processing all the morts from the Western Isles within North Uist this will negate the requirement to transport them by ferry and road transport to the south of Scotland.

Site photographs are [posted online](#) dated 25 March 2021 – including:

Site photographs



On 30 March 2021, [Western Isles Council granted planning permission to Whiteshore Cockles](#):



Angus A MacDonald Contracting Services Ltd
Per Mr Ralph Thompson
Kyles Office
Kyles
Bayhead
North Uist
HS6 5DY

COMHAIRLE NAN EILEAN SIAR

Balivanich, Isle of Benbecula, HS7 5LA

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Writer	Anne Napier
Our Reference	ANNNAP/CCM
Your Reference	
Date	30 March 2021

Dear Sir/Madam

APPROVAL OF PLANNING PERMISSION (DETAILED)

APPLICATION REFERENCE NO:	19/00288
TYPE OF APPLICATION:	Planning Permission (Detailed)
LOCATION OF DEVELOPMENT:	Whiteshore Cockles, Kyles Paible, Bayhead
PROPOSAL:	Use and extension of building to house biomass boiler; heighten part of roof; and install two flues.

Please find attached the Decision Notice relating to the above proposal, together with the Schedule of Approved Plans. Any conditions imposed on the grant of planning permission are detailed in Schedule 1. Conditions must be complied with and failure to do so may result in the Comhairle taking enforcement action. Certain conditions require that you submit details for agreement or information before works commence. Informatives may be included and are to make you aware of issues that may be pertinent to the proposed development .

The schedule of conditions included:

SCHEDULE 1: CONDITIONS

APPLICATION REFERENCE NO: **19/00288**

The following legally enforceable conditions are imposed on the grant of this planning consent for the reasons stated after each condition.

- Condition 6** No storage of fish mortars shall take place within the site at any time, except within the reception pit within the fish reception building.
Reason To protect the amenity and living conditions of nearby occupiers.
- Condition 9** The quantity of fish mortars processed on the site shall not exceed 2 tonnes per hour, to not exceed a total of 48 tonnes in 24 hours.
Reason To control the scale of the operations on site, to protect the amenity and living conditions of nearby occupiers.

The [planning permission approval dated 30 March 2021](#) also cited the need to obtain a Marine Licence from Marine Scotland for discharge of waste water to the sea and “would be subject to strict environmental controls through the Part A, Pollution Prevention and Control permitting process, regulation by SEPA”:

SCHEDULE 2: PLANS
(AND AS APPLICABLE) DETAILS OF APPROVED VARIATIONS, PLANNING AGREEMENTS AND DIRECTIONS

APPLICATION REFERENCE NO:	19/00288
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Development Plan Compliance and Reasoning

It is considered that the extension and alteration of the existing building as proposed would meet the requirements of the development strategy set out in Outer Hebrides Local Development Plan 2018 (OHLDP) Policy DS1. The proposed use of the building and the application site for the processing, disposal and recovery of fish morts would be subject to strict environmental controls through the Part A, Pollution Prevention and Control permitting process, regulated by SEPA. The discharge of waste water to the sea would require a Marine Licence, which would be determined by Marine Scotland.

As such, it is considered that the application of planning conditions in these regards would not be necessary. However, to protect the amenity and living conditions of the local community, it is considered that controls would be required in relation to external storage and lighting, delivery times, access arrangements, quantity of fish morts processed on site, details of the finalised design and appearance of the building, plant and machinery, storage facilities, effluent storage, treatment and drainage provision for the site.

Given the existing use of the wider site and subject to these conditions, it is considered that the environmental and social impacts of the application development would be acceptable and that it would also result in economic benefits, both to the local economy and to the wider fish farming industry. For these reasons, it is considered that the application development would be in accordance with OHLDP Policies EI1, EI2, EI3, EI4, EI8, ED1, ED4, NBH1, NBH2, PD2 and PD6, and DP8 in the Supplementary Guidance on Marine Fish Farming. It would also not conflict with the National Planning Framework 3, the Scottish Planning Policy or the Zero Waste Plan.

Download other planning documents [online here](#)



 [On-line Planning](#)

Planning – Planning Application Documents

19/00288/PPD | Use and extension of building to house biomass boiler; heighten part of roof; and install two flues. | Whiteshore Cockles Of North Uist

Western Isles Council [reported on 30 March 2021](#) that “operation of the new drying facility...has not commenced”:



PLANNING APPLICATIONS BOARD

30 MARCH 2021

19/00288/PPD & 20/00007/PPD – BUILDINGS TO RECEIVE AND HOUSE PLANT TO PROCESS SALMON MORTS, WHITESHORE COCKLES LTD, BAYHEAD, NORTH UIST

Report by Head of Economic Development and Planning

- 2.3 Following concerns raised about the environmental impacts of the proposal, the developer has provided further details about the project. Whilst a number of matters are still outstanding, comments recently received from SEPA indicate that these are matters that can be addressed through the necessary Pollution Prevention and Control (PPC) Part A permitting process, regulated by SEPA.
- 5.1 The site is located in Paible, Bayhead, North Uist, within an area of machair adjacent to the coast. The site area is some 0.4ha in size and it forms part of a larger site of about 2ha, which has been used for the burial of salmon fish morts since 2005.
- 5.4 Planning permission was granted in February 2005 (Ref 04/00670/FUL) for the disposal of fish morts by burying or ensiling and erection of sheds, on a larger site which includes the area of the current applications. Disposal operations have taken place since that time, on land between the area of built development and the coast. A further permission was granted in 2012 (Ref 12/00020/PPD) to remove the geographical restriction on the source of the fish morts originally applied to the previous permission.
- 5.5 In 2014, planning consent was granted (Ref 14/00333) to construct and operate a facility for the drying of fish morts at the existing waste handling site (the 2014 building). Construction of the facility progressed but operation of the new drying facility, then proposed, has not commenced. The current applications follow further design evolutions for the process, requiring larger areas under the cover of buildings and increased height to accommodate plant, discharge stack and ultimately the use of the facility for the process.
- 5.6 It is understood that fish morts are classed as Category 2 animal by-products (ABPs). It is further understood that the disposal of fish morts by burial was conducted under a derogation for remote areas, for the disposal of ABPs, under the control of the Animal and Plant Health Authority, initially monitored through Comhairle nan Eilean Siar (Animal Health). It was not considered to be a permitted operation.
- 5.7 In January 2016 the derogation for the disposal of salmon morts by this means ceased to be effective, through an amendment to the Animal By-Products (Enforcement) (Scotland) Regulations 2013. Notwithstanding the Regulations, the Scottish Government (Animal Health and Welfare Division) granted its authority to allow the burial of fish morts to continue, initially for periods of six months and in October 2019, confirmed this burial activity could continue on this particular site, on condition that burial would end when a fish waste processing facility, planned for the site, was granted a PPC permit from SEPA.
- 5.8 From the applicant’s submitted Best Available Techniques (BAT) Assessment, it is understood that the aquaculture industry is now required to ensure that they dispose of their waste in accordance with the 2013 Regulations, so that it can no longer be landfilled.

- 5.16 Details of the proposed effluent storage and treatment facilities and of drainage arrangements for the site have not been provided, although it is understood that discharge to sea following treatment is proposed.

LEGISLATIVE CONTEXT

- 6.1 Sections 25 and 37(2) of the Town and Country Planning (Scotland) Act 1997 (the Act) require that planning decisions be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 6.2 The type of facility proposed to operate from the site would be closely controlled under Part A of the Pollution Prevention and Control (PPC) regime, which represents the highest level of environmental control and is regulated by SEPA. The PPC permit regime provides an integrated environmental approach to the regulation of certain industrial activities, meaning that emissions to air, water and land, plus a range of other environmental effects, must be considered together.
- 6.3 A Part A PPC permit is required for major or complex industrial processes and certain types of waste operations, which undertake the highest risk activities. The main aim of the PPC regime is to achieve a high level of protection of the environment taken as a whole, by measures designed to prevent or, where that is not practicable, reduce emissions to air, water and land.
- 6.4 In addition to the above, if discharge from the site to the sea is proposed, this would require a Marine Licence from Marine Scotland.
- 6.5 Article 4 of the Waste Framework Directive (WFD) sets out the elements of the waste hierarchy, with waste prevention as the highest priority, followed in order by reuse, recycling, recovery and disposal. Article 16 of the WFD, which outlines the principles of self-sufficiency and proximity, specifies: the need 'to establish an integrated and adequate network of waste disposal installations [...] taking into account geographical circumstances or the need for specialised installations for certain types of waste'; and that 'the network shall enable waste to be disposed of in one of the nearest appropriate installations'.
- 6.6 The Waste (Scotland) Regulations 2012 provide a statutory framework to maximise the quantity and quality of materials available for recycling and to minimise the need for residual waste infrastructure, in accordance with the objectives of the revised WFD and Scotland's Zero Waste Plan (ZWP).
- 14.14 Documents have been provided in support of the proposal, which were submitted to address concerns about its potential environmental impacts. Following receipt of this additional information, SEPA has provided a further consultation response, which is provided in full in Appendix 4. This response indicates that SEPA does not consider that all the elements of the proposals as currently set out are capable of being authorised under the PPC regulations. Particular concerns have been raised about odour control.
- 14.15 In that respect, it is noted that the current operations on site have led to problems of odour within the local area. Fish processed at the site are those that have died at fish farms and, as a result, are at varying stages of decomposition when received at the site. The applicant's Odour Impact Assessment has identified the smell as being within the '*most offensive*' category. However, while the burial of decomposing fish on the site would cease, this would be replaced by the processing and heating of those fish. From discussions with SEPA, it is understood that this has the real potential to result in higher levels of emissions and greater odour impact than the existing use.

- 14.19 The site is located outside but relatively close to a number of environmentally sensitive areas. These include: Baleshare and Kikibost Site of Special Scientific Interest, which has one of the largest sand dune systems in Western Scotland; North Uist Machair Special Area of Conservation, which is designated for features including dunes, machair, marram, nutrient rich lochs, Atlantic salt meadows and drift lines; West Coast of the Outer Hebrides Special Protection Area, which is important for supporting breeding, non-breeding and migratory species of waterfowl and seabirds; and the North Uist Machair and Islands Special Protection Area and Ramsar site, which is noted for supporting breeding and migratory species of waders and Corncrake.
- 14.21 The consultation response from SEPA confirmed that all discharges to air (including odour), waste management issues, aqueous discharges and, in conjunction with the Animal and Plant Health Authority (APHA), the onsite management of animal by-products, would be directly controlled by SEPA through the PPC permit. In addition, Marine Scotland would regulate any discharges to the sea.
- 14.53 The OHLDP confirms that good quality water and waste water infrastructure is important not only to serve new development but also to protect the environment. Policy EI2 requires new developments to adopt the principles of Sustainable Drainage Systems (SuDS). The policy also requires private waste water systems to discharge to land. Where this is not possible, the developer must submit evidence that discharge to the water environment is acceptable to SEPA.
- 14.54 The application sites are close to the coast, but are separated from it by the remainder of the wider site. Policy EI3 requires development proposals to avoid adverse impact on the water environment. It states that all proposals involving activities adjacent to any water body must be accompanied by sufficient information to enable a full assessment to be made of the likely effects, including environmental effects, of the development.
- 14.55 In this case, no details of the waste water treatment or drainage arrangements have been provided. It is understood that drainage to the sea is likely to be proposed, which would require a licence from Marine Scotland. On-site effluent storage and treatment facilities are matters that would be subject to control through the PPC permit process. However, in the absence of details in these regards, there is the potential for further development and/or plant to be required on site to meet these requirements.

Appendix 4 [dated 25 March 2021](#) includes:

CONSULTATION RESPONSES

APPENDIX 4

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
SEPA	July 2019	<p>We thank the applicant for supplying further information in their email, which SEPA received on 17 July 2019.</p> <p>Advice for the planning authority</p> <p>Unfortunately we must object to this planning application on the grounds of lack of information. We will be pleased to consider the proposals further when the information identified below is submitted. Please note the advice outlined below.</p> <p>1. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA) and planning issues</p> <p>1.1 Now that we are aware of the processes involved with the development, we advise that the proposal should be reconsidered under Schedule 2.</p>	Jan 2020	<p>Advice for the planning authority</p> <p>This development has the potential to be highly odorous and a very high standard of odour treatment and control is required to minimise the release of offensive smells. Whilst SEPA will control the processes through PPC, we consider these matters need to be considered further at the planning stage as the acceptability of the proposed design, layout and mitigation measures cannot be determined, nor the likelihood of residual odour when odour measures are implemented. We therefore object to this planning application on the grounds of lack of information. We will review this objection if the issues detailed in Section 1 below are adequately addressed.</p> <p>1. Pollution Prevention and Control (Scotland) Regulations 2012 (PPC)</p> <p>1.1 Our response to you of 24 July 2019 on related application 19/00288/PPD indicated that the processing and</p>

CONSULTATION RESPONSES

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>section 11(b)(i) Installation for the disposal of waste by incineration of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>1.2 This proposal has the potential to be highly odorous and a very high standard of odour treatment and control is required to minimise the release of offensive smells. However, in our experience, even with full compliance with regulatory controls, residual odour cannot be fully mitigated. Additionally, we have experience of such plant causing odour issues when equipment malfunctions. We therefore advise (whether or not EIA is required) that this issue should be addressed to assess impacts to potential receptors, which include residential properties and a school. In planning terms, the Planning Authority should consider if this location, in its proximity to nearby receptors, is suitable. This can be considered when the information identified below is available.</p> <p>1.3 As the proposal is a waste management development, policy and guidance related to waste contained within Scottish Planning Policy, Zero Waste Plan, Thermal Treatment of Waste Guidelines 2014 and guidance should be considered. The proposed development should be considered within the waste hierarchy: waste prevention, reuse, recycling, energy recovery and waste disposal.</p> <p>2. Pollution Prevention and Control (Scotland) Regulations 2012 (PPC)</p> <p>2.1 This proposal will require a PPC Part A permit as it will be processing and disposing of animal waste. Insufficient information has been provided to determine whether this scheme is capable of being authorised by us under PPC. We therefore must object and ask that the applicant contact SEPA Regulatory Services Team (details provided in Section 3.1 below) to discuss their PPC requirements in more detail. We would also direct</p>		<p>disposing of animal waste at this site requires a PPC Part A permit from SEPA. We can confirm that the storage of fish mortars before processing will need to be authorised under the same PPC Part A permit.</p> <p>1.2 As you know we met with the applicants and their consultant on 25 September 2019 to discuss the information required to allow us to withdraw our objection to related application 19/00288/PPD and to instigate pre- PPC application dialogue. This was followed by further constructive discussions in October and while some further general discussions have occurred with our technical specialist no information has been submitted to address our existing objection and a PPC permit has not yet been submitted.</p> <p>1.3 We always welcome pre-application engagement, especially on a proposal like this one which will be directly regulated by us and where it raises similar issues to a related application where we have an outstanding objection. We are therefore disappointed that this application has been submitted without the developer seeking our initial advice.</p> <p>1.4 As we have highlighted previously and outlined above this development has the potential to be highly odorous and a very high standard of odour treatment and control is required to minimise the release of offensive smells. The simplest (and likely most long term cost effective) method of reducing odours from the site is by locating the storage and treatment facilities in the same building. This allows a single odour treatment system to be put in place and removes the possibility of odour releases during outside movement of material between buildings, where releases are most difficult to contain and manage. We would therefore strongly advise the developer to reconsider the current proposal and instead further extend the existing process building to accommodate the storage areas.</p> <p>1.5 Unfortunately insufficient information has been provided to determine whether this storage proposal is capable of being authorised by us under PPC. We therefore must object until the issues outlined in sections 1.6 to 1.8 below are addressed to the extent that is relevant to planning and we are able to confirm that the proposal is capable of being authorised.</p>

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>the applicant to review the advice on PPC Part A activities on the SEPA website and the detailed guidance for PPC Part A installations here.</p> <p>As some of the information required under PPC is required in order to inform the planning application, particularly to determine potential impact on sensitive receptors and whether or not the location is suitable for the proposed use, then we are obliged to object until this information is</p> <p>2.2 We highlight that even when we are able to provide a view on whether we consider the proposal capable of being authorised, we consider it to be at the applicant's commercial risk if any significant changes required</p> <p>---ORIGINAL RESPONSE 03.07.19--- Advice for the planning authority</p> <p>Unfortunately, we object to this planning application on the grounds of lack of information. We will review this objection if the issues detailed below are adequately addressed.</p> <p>Advice for the planning authority</p> <p>1. The Pollution Prevention and Control (Scotland) Regulations 2012 (PPC 2012)</p> <p>1.1 The applicant should confirm the thermal input of the proposed boiler in MW and whether it falls under the scope the Medium Combustion Plant Directive requirements within the Pollution Prevention and Controls (Scotland) Regulations 2012 (as amended). Further guidance can be found here.</p> <p>1.2 Depending on the size, scale and location of the Medium Combustion Plant (MCP), an Air Quality Impact Assessment (AQIA) may be required to</p>		<p>1.6 The building needs to be demonstrated to be designed in such a way as to ensure odours during normal working and cleaning are adequately contained, treated and released. No information is provided to explain the proposed working process and the Fish Pit Building drawing (dated 6/11/2019) is very basic and does not provide any detail in relation to the measures required. For example, the current design does not include any doors. The Building drawing needs to show the measures that will be used to contain and treat odours (design of doors to ensure negative pressure for example), and location of treatment facilities (which could include for example external chimneys). We ask that a supporting statement is also submitted to explain the proposed working practices so that it is clear that any physical requirements necessary are included on the plan. For example how is the material going to be moved from the underground pit to the process area? It may be that the odour treatment system is combined with the system to be used in the processing building; if this is the case then this should also be shown on a clear plan.</p> <p>1.7 To comply with animal by-products legislation and to minimise the potential for odour release the two pits shown on the Fish Pit - Fish Trough and Frame drawing (dated 5/11/19) will need to be cleaned out at regular intervals using approved liquid based cleaning agents. The waste effluent from this process will need to be contained, treated and then discharged to a suitable location, which we presume in this case is likely to be the sea. No information is provided on this aspect of the development. It will need to be clearly demonstrated that there is space within the building or within the site for the treatment system and the route to the discharge location will need to be shown (and presumably included in the red-line boundary of the planning application) and it will need to be demonstrated that the discharge is capable of being authorised by us under PPC. We recommend that a single treatment system is developed for the whole site.</p> <p>1.8 We note from the WSC Layout Fish Pit Building (dated 5/11/19) drawing that the fish are to be stored in an underground pit. Again, if we had been consulted prior to the application been</p>

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>protect local air quality. We recommend pre-application consultation with the Planning Authority to determine if an AQIA is required as part of the planning application.</p> <p>1.3 The applicant is advised to also consider the potential need to undertake a habitats impacts assessment as required by the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) and Nature Conservation (Scotland) Act 2004. This aspect could require consideration within any AQIA. Further guidance as to their application can be found within SEPA's MCPD application form: https://www.sepa.org.uk/media/399181/ppc_mcp_a_pplication_form.docx</p> <p>1.4 No information has been supplied on the fuel that will be burned, or the source. In order to determine whether this activity is likely consentable, we must object until the following information is submitted:</p> <p>a) The thermal input of the proposed boiler (in MW)</p> <p>b) The height of any stacks proposed</p> <p>c) The sources and volumes of the fuel;</p> <p>d) Drainage for any storage and processing areas.</p> <p>1.5 The discharge of boiler blow down requires a licence under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 if it is being discharged to surface or groundwater. Further guidance can be found here.</p> <p>1.6 Regulatory advice for the applicant</p> <p>2. Regulatory requirements</p> <p>2.1 Guidance on fuels can be found in our Permitting Guidance for Biomass Combustion. In addition, it must be ensured that ash is disposed of to a licensed waste facility.</p> <p>2.2 Details of general regulatory requirements and good practice advice for the applicant can be</p>		<p>submitted we would have advised against this design. This is because it will be challenging for the developer to demonstrate that the integrity of the structure is being maintained and it is preventing the entry of pollutants into the ground. We would therefore strongly advise that the developer reconsiders the current proposal and amends the design to include an above ground structure instead. If the design is not revised then at the very least the plans need to be update to show that the sub-surface vessel is double skinned with a monitoring systems in place as set out CIRIA guidance note C736 Containment systems for the prevention of pollution Secondary, tertiary and other measures for industrial and commercial premises.</p> <p>1.9 Our Specialist Alastair Whyte (contact details below) would be very happy to provide further advice to the developer on any of the above issues. Since the two applications for the site and our related objections are interlinked we recommend that a single comprehensive submission is prepared to address all the issues.</p> <p>1.10 We highlight that even when we are able to provide a view on whether we consider the proposal capable of being authorised, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application.</p> <p>1.11 We will directly control discharges to the air and water, odour, noise from the process and arrangements for the storage of chemicals, accidents / incident response and decommissioning under the PPC Regulations. As a result we will not be asking for specific planning conditions in relation to these issues, but appreciate that you may nonetheless in some cases apply related conditions to ensure you have suitable control over the relevant planning elements. We would be pleased to discuss the detailed wording of any related conditions you intend to apply to ensure they do not conflict with the PPC permit.</p> <p>Regulatory advice for the applicant</p> <p>2. Regulatory requirements</p>

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>found on the Regulations section of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the Regulatory Services Team in your local SEPA office at: James Square, James Street, Stornoway HS1 2QN Tel: 01851 706477.</p>		<p>2.1 Please review the advice on PPC Part A activities on the SEPA website and the detailed guidance for PPC Part A installations here.</p> <p>2.2 Please contact Alastair Whyte, Specialist within the SEPA Waste and Industry team, by telephone (01349 860379) or via alastair.whyte@sepa.org.uk to discuss the requirements of the PPC Part A permit and if you require any further advice on the issues outlined above. He would welcome continued engagement as the project develops to ensure that the environmental implications of the decisions being made are fully understood.</p> <p>2.3 Details of other regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a non-PPC specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office at: James Square, James Street, Stornoway HS1 2QN Tel: 01851 706477.</p> <p>Should you wish to discuss this letter please do not hesitate to contact me on 01349 860359 or planning.dingwall@sepa.org.uk.</p>
	Jan 2020	<p>Advice for the planning authority</p> <p>The only new information currently on your website is Drawing "03(a) visual 1", which is a copy of a recent email chain between you and Mr Thompson including a basic site plan, and Drawing "04(a) visual 2", which is a visualisation of the building.</p> <p>As you know we met with the applicants and their consultant on 25 September 2019 to discuss the information required to allow us to withdraw our objection and this was followed by further constructive discussions with our technical specialist in October. However the information currently submitted does not address the issues we previously highlighted and therefore we maintain our objection.</p>	15 March 2021	<p>Advice to the planning authority</p> <p>We refer you and the developer to our previous responses of 21 Jan 2020 and 20 July 2020 which outlined the information we need to be included within the applications for us to provide you with our full planning advice.</p> <p>Based on the new submissions, which do not provide all the information we requested previously and include some contradictions and inaccuracies, we do not consider that all of the elements of the proposals as currently set out are capable of being authorised by us under the PPC regulations. We are especially concerned in relation to odour control. However taking into consideration the location and size of the site then we do consider that an improved proposal which has a better standard of emissions management and provides clarity as to how the process will function would be capable of being</p>

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>The discussions we have had so far suggest that the main issues on which we require information are air emissions, odour control, effluent discharge and material storage.</p> <p>We note that the visualisation for the building now includes another stack (with a cowl which is often not Best Available Techniques) so we highlight that will need to be assessed in the air quality and odour impact assessment if it has the potential to release pollutants.</p> <p>Regulatory advice for the applicant</p> <p>Please contact Alastair Whyte, Specialist within the SEPA Waste and Industry team, by telephone (01349 860379) or via alastair.whyte@sepa.org.uk to discuss the requirements of the PPC Part A permit and if you require any further advice on the issues outlined in our previous response. He would welcome continued engagement as the project develops to ensure that the environmental implications of the decisions being made are fully understood.</p> <p>Details of other regulatory requirements and good practice advice for the applicant can be found on the Regulations section of our website. If you are unable to find the advice you need for a non-PPC specific regulatory matter, please contact a member of the regulatory services team in your local SEPA office at: James Square, James Street, Stornoway HS1 2QN Tel: 01851 706477.</p>		<p>authorised by SEPA. On that basis we withdraw our objections to these planning applications.</p> <p>We highlight however that as indicated above the development proposals will need to be modified and our above planning position is on the basis that the developer will continue to work with us to address the issues which we have identified, on which we will follow up directly with them in the near future.</p> <p>This further collaboration will likely result in changes to the site layout, which you may wish to take into consideration when approving current layout plans and setting conditions. We consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We can confirm that all discharges to air (including odour), waste management issues, aqueous discharges, and in conjunction with Animal and Plant Health Authority the onsite management of animal by-products, will be directly controlled by us via PPC and therefore we do not specifically request any planning conditions in relation to these environmental issues. Again, if helpful, we would be happy to discuss planning conditions with you further.</p> <p>Advice to the developer</p> <p>Our specialist Alastair Whyte will contact you again shortly to discuss the information provided in your planning submission and how it will relate to any subsequent PPC application.</p>
	May 2020	We note the proposals to enlarge the building but we are not clear as to the reasons for this and no information is provided to address the issues we have outlined previously. We therefore maintain our objection until the issues outlined in our previous		

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		response have been addressed and information is submitted to explain the changes now proposed. Please re-consult us when this is provided.		
	Sept 2020	<p>Thank you for your email which SEPA received on 8 July 2020 relating to SEPA's current objection to the above planning applications and for your subsequent response of 15 July 2020 confirming your proposals to soon submit your PPC permit application.</p> <p>We need enough information at the planning application stage to be able to give a view to the planning authority on whether the proposal is capable of being authorised by us, taking into consideration Best Available Techniques (BAT), the location of the site (to ensure that sensitive receptors are suitably considered) and the size of the site (to ensure all the infrastructure required can be accommodated). The note of the meeting of 25 September 2019 provided to you by our Alastair Whyte is a good detailed summary of the main issues which will need to be addressed as part of the PPC application, highlighting those that are especially relevant to planning. In view of this and subsequent discussions, revisions to application 19/00288/PPD and submission of application 20/00007/PPD we can clarify that we currently have the following planning information requirements, all of which need to be addressed by a suitably detailed planning submission (in addition to separately being addressed in full detail as part of the PPC permit submission):</p> <ol style="list-style-type: none"> (1) An updated basic description of the proposed working process, with reference to a clear process drawing, with supporting plan(s), showing what activities will take place in which locations. (2) For any identified environmental impact arising from the operation of the proposed facility, an 		

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>explanation of why the techniques proposed should be considered as appropriate and the best available in these site-specific circumstances. A full BAT assessment will be required as part of the PPC permit application process.</p> <p>(3) A description of all the different odour sources and an explanation of how any emissions will be avoided or treated. Where abatement measures have planning implications (e.g. treatment system or contained within a structure) then proposals should be shown on clear plans. This description should be supported by an odour impact assessment that establishes the potential effect any residual or exceptional odour emissions will have on the surrounding community. We strongly advise that you engage with our Alastair Whyte regarding the odour treatment options, prior to submitting your response, so that the case for the chosen techniques are fully understood to assure us that it is capable being permitted as BAT.</p> <p>(4) A description of the sources of emissions that could affect air quality. This could include the animal by-product co-incinerator (referred to as the "boiler"), any electricity generating plant and odour treatment plant. The expected emissions from the sources should be provided and the submission supported with an air quality impact assessment, which considers the potential effects of these emissions on the surrounding community and nearby designated sensitive natural areas.</p> <p>(5) A description of all the different effluent discharges produced and information on how they will be stored, treated and disposed of. This should include liquid discharges from the fish pits, boiler blow down and any condensate. We need to understand if a single system will treat all the waste effluent from the site or whether it will be a variety of different systems. These treatment systems will</p>		

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>have a land take so information is required on whether storage and treatment will occur within the existing or proposed buildings, or within other new buildings, or elsewhere within the site. A clear layout plan should be provided as part of the explanation. If a discharge to the sea is required then the proposed location of this should be shown. We also highlight that the red line boundary of the planning application may need to be amended as a result.</p> <p>(6) A plan showing surface water drainage proposals. Working areas, such as Animal By Products, chemical and waste storage and handling locations, will need to be contained with run-off directed to a catchment/treatment system. A simple drainage statement should explain the proposals. We would encourage you to provide method statements to our Alastair Whyte for the variety of impacts assessment that are required prior to the work being carried out. This will ensure that they meet our requirement and do not result in abortive work. We would also be very happy to provide comment on draft planning submissions prior to them being formally submitted to the planning authority, if this would be helpful.</p>		
	March 2021	<p>Advice to the planning authority</p> <p>We refer you and the developer to our previous responses of 21 Jan 2020 and 20 July 2020 which outlined the information we need to be included within the applications for us to provide you with our full planning advice.</p> <p>Based on the new submissions, which do not provide all the information we requested previously and include some contradictions and inaccuracies, we do not consider that all of the elements of the proposals as currently set out are capable of being authorised by us under the PPC regulations. We are especially concerned in relation to odour control. However</p>		

Consultee	Date	19/00288/PDD	Date	20/00007/PPD
		<p>taking into consideration the location and size of the site then we do consider that an improved proposal which has a better standard of emissions management and provides clarity as to how the process will function would be capable of being authorised by SEPA. On that basis we withdraw our objections to these planning applications.</p> <p>We highlight however that as indicated above the development proposals will need to be modified and our above planning position is on the basis that the developer will continue to work with us to address the issues which we have identified, on which we will follow up directly with them in the near future.</p> <p>This further collaboration will likely result in changes to the site layout, which you may wish to take into consideration when approving current layout plans and setting conditions. We consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We can confirm that all discharges to air (including odour), waste management issues, aqueous discharges, and in conjunction with Animal and Plant Health Authority the onsite management of animal by-products, will be directly controlled by us via PPC and therefore we do not specifically request any planning conditions in relation to these environmental issues. Again, if helpful, we would be happy to discuss planning conditions with you further.</p> <p>Advice to the developer Our specialist Alastair Whyte will contact you again shortly to discuss the information provided in your planning submission and how it will relate to any subsequent PPC application.</p>		

Scottish Salmon Watch can find no application by Whiteshore Cockles to either SEPA or the Scottish Government for the necessary pollution permits to operate a fish dryer and discharge wastes to the sea close to a number of environmentally sensitive and EU protected habitats. A FOI request was filed earlier this week (25 May 2021) to both SEPA and the Scottish Government for information on Whiteshore Cockles.

In the absence of SEPA and Scottish Government permits – and SEPA’s concerns that not all elements of the proposal are capable of being authorized under the PPC regulations - it is considered likely that Whiteshore Cockles may never operate a fish drier. Even if Whiteshore Cockles did manage to secure SEPA and Scottish Government authorizations it could still be years before the fish drier became operational.

In the meantime, Scottish Salmon Watch urges the UK and Scottish Government – as well as the EU – to force the end to the illegal dumping of diseased salmon by Whiteshore Cockles and salmon farming companies such as Mowi (Marine Harvest), The Scottish Salmon Company and Loch Duart in the Outer Hebrides.

Whiteshore Cockles was [officially registered as a company in 2010](#) – with [current control listed at Companies House via Angus Macdonald and Michelle Macdonald](#).

FILE COPY

CERTIFICATE OF INCORPORATION OF A PRIVATE LIMITED COMPANY

Company No. 379476

The Registrar of Companies for Scotland hereby certifies that

WHITESHORE COCKLES LTD

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by shares, and the situation of its registered office is in Scotland

Given at Companies House on **1st June 2010**

WHITESHORE COCKLES LTD

Company number **SC379476**

2 active persons with significant control / 0 active statements

Mr Angus Alick Macdonald **ACTIVE**

Correspondence address

White Shore, Kyles Paible, Bayhead, Isle Of North Uist, Western Isles, Scotland, HS6 5DY

Notified on
6 April 2016

Date of birth
January 1965

Nationality
British

Nature of control

Ownership of shares – More than 25% but not more than 50%

Ownership of voting rights - More than 25% but not more than 50%

Country of residence

Scotland

The [latest accounts for Whiteshore Cockles filed on 30 November 2020](#) detailed:

WHITESHORE COCKLES LTD (REGISTERED NUMBER: SC379476)

Balance Sheet					
30 June 2020					
	Notes	30.6.20	£	30.6.19	£
FIXED ASSETS					
Tangible assets	5		2,346,287		1,408,448
CURRENT ASSETS					
Debtors	6	268,433		230,674	
Cash at bank		<u>366,896</u>		<u>-</u>	
				<u>230,674</u>	
CREDITORS					
Amounts falling due within one year	7	<u>219,348</u>		<u>449,548</u>	
NET CURRENT ASSETS/(LIABILITIES)			<u>415,981</u>		<u>(218,874)</u>
TOTAL ASSETS LESS CURRENT LIABILITIES			2,762,268		1,189,574
CREDITORS					
Amounts falling due after more than one year	8		(1,540,116)		(311,998)
PROVISIONS FOR LIABILITIES			(27,624)		(27,624)
ACCRUALS AND DEFERRED INCOME			(435,608)		(467,208)
NET ASSETS			<u>758,920</u>		<u>382,744</u>
CAPITAL AND RESERVES					
Called up share capital			200		200
Retained earnings			<u>758,720</u>		<u>382,544</u>
SHAREHOLDERS' FUNDS			<u>758,920</u>		<u>382,744</u>

WHITESHORE COCKLES LTD (REGISTERED NUMBER: SC379476)

Notes to the Financial Statements - continued
for the Year Ended 30 June 2020

6. DEBTORS: AMOUNTS FALLING DUE WITHIN ONE YEAR		30.6.20	30.6.19
		£	£
Trade debtors		224,470	145,800
Amounts owed by associates		21,997	23,348
Other debtors		<u>21,966</u>	<u>61,526</u>
		<u>268,433</u>	<u>230,674</u>
7. CREDITORS: AMOUNTS FALLING DUE WITHIN ONE YEAR		30.6.20	30.6.19
		£	£
Bank loans and overdrafts		-	61,407
Hire purchase contracts		15,531	20,249
Trade creditors		30,208	260,310
Amounts owed to associates		87,931	82,602
Taxation and social security		39,098	1,200
Other creditors		<u>46,580</u>	<u>23,780</u>
		<u>219,348</u>	<u>449,548</u>
8. CREDITORS: AMOUNTS FALLING DUE AFTER MORE THAN ONE YEAR		30.6.20	30.6.19
		£	£
Bank loans		1,247,323	-
Hire purchase contracts		26,828	-
Other creditors		<u>265,965</u>	<u>311,998</u>
		<u>1,540,116</u>	<u>311,998</u>
Amounts falling due in more than five years:			
Repayable by instalments			
Bank loans more 5 yr by instal		<u>1,247,323</u>	<u>-</u>

Whiteshore Cockles – A Dumping Ground for Millions of Disease-Ridden Scottish Salmon since 2005

The Sunday Times [reported in July 2005](#):



Fears raised by salmon dump

Marc Horne

Sunday July 17 2005, 1.00am,
The Sunday Times

Share     Save 

More than 100,000 fish have been buried, along with fish waste treated with acid, on a beach in North Uist.

Residents and campaigners say the dump is a threat to public health and called on the Scottish executive to introduce tougher regulations.

The fish were dumped following an outbreak of infectious pancreatic necrosis and a suspected outbreak of infectious salmon anaemia (ISA) at a fish farm run by Marine Harvest, a seafood firm, on the neighbouring island of South Uist.

Susan Rothwell, whose home is less than half a mile from the Kyles Paible dump, said: "The smell is indescribable. The stench of rotting fish day in, day out makes you feel ill. If you go anywhere near the place it is just covered by flies and seagulls.



Bruce Sandison, chairman of the Salmon Farm Protest Group, said: "This is an environmental and public health hazard on one of the most sensitive landscapes in Europe."

Planning permission was granted by the Western Isles council in 2004. The Scottish Environment Protection Agency (SEPA) said it was monitoring the dump.

Dave Cahill, a manager for Marine Harvest Scotland, said: "There was a temporary increase in the number of fish composted when there was a suspicion of ISA last year. Some fish were also killed in a storm last January. This has now returned to normal.

"Our procedures for disposing of the fish comply with all legal standards."

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Bruce Sandison of The Salmon Farm Protest Group [reported in July 2005](#):

SALMON FARM PROTEST GROUP, JULY 2005

THE SALMON KILLER DISEASE THAT NEVER WAS

BRUCE SANDISON ASSESSES AVAILABLE EVIDENCE AND REPORTS FROM A FARM FISH DISPOSAL DUMP ON NORTH UIST AND FROM THE MARINE HARVEST FISH FARM AT LOCH SHEILAVAIG ON SOUTH UIST

As we reported in May, the SFPG has been unable to obtain information from the Scottish Executive's (SE) Fisheries Research Services (FRS) about what is really happening on Marine Harvest fish farm sites in South Uist; particularly at the site at Loch Sheilavaig where the salmon-killer disease ISA (infectious salmon anaemia) was suspected: how many fish died there, what did they die of, which freshwater hatchery supplied the fish that became diseased, how many diseased fish escaped from the site during last January's storms.

The reason given by the FRS for withholding this information, which FRS admit they have, is that Marine Harvest refused to give permission for the release of details to the SFPG, and, as such, FRS could not then legally divulge that information to us.

The SE announced in November that there was a suspected outbreak of ISA at the Loch Sheilavaig site and that a movement control order had been imposed and controls placed upon nearby farms in Benbecula and North Uist. The Loch Sheilavaig controls were lifted on 19th May when the SE said there was no 'continuing evidence' of the disease.

Lewis Macdonald, Deputy Minister for Environment and Rural Development said: "Prompt action by companies in co-operation with the Fisheries Research Service's Health Inspectors is critical to preventing any possibility of disease spreading. It is because Marine Harvest responded in this way that we are today able to lift these restrictions."

So how did the fish die? FRS inspectors reported (10th November) that fish in one cage (at Loch Sheilavaig) were behaving abnormally, 'congregating at the surface', that the majority of fish had 'high sea lice load', that one fish, 'which had been dead for a considerable period of time, had a dark liver'. However, in response to written questions from the Scottish Green Party, the Lewis Macdonald would say only that ISA had not been found at the site.

But dead fish are still being removed from a Marine Harvest site in South Uist and there has been no SE announcement, at least none that the SFPG has seen, imposing new restriction orders on any fish farm site in the area.

The Scottish Environment Protection Agency (SEPA), under the Environmental Information Act, supplied SPFG with some detail about how dead fish were being disposed of near Kyles- Paible in North Uist, but that information appears to contradict reports received by SFPG about the location, use and operation of the site.

Jamie Hepburn, SEPA Environment Protection Officer, in a letter (7th December 04) to David Fraser of FRS, identified the burial site as being at Gd Reference 750670, but according to the planning approval issued by Western Isles Council, the site is in fact about half a mile further west at Gd Reference 737664.

Stuart Baird, also of SEPA, reported to David Fraser on 7th December 04 that SEPA had made “an assessment of the site that is being utilised to bury fish at Bornish, North Uist”. But Bornish is in South Uist, not North Uist?

Jamie Hepburn visited the site on 14th December, accompanied by Hazel MacLeod and Matt Macdonald. Which site they visited is not clear; the one he identified, or the one identified by Western Isles Council? Hepburn said: “The area is now taking fish waste from ISA sites on East Uist”. SEPA thus confirm that ISA was present, but the Minister denies ISA was found.

In a further letter dated 17th December, Mr Hepburn wrote: “The designated area is fenced and has access from the beach via a gate. There is a disinfectant procedure inside the gate. There was no evidence of any liquid escape or impact on the beach or surrounding area, there was no evidence of smell at the site. The site had numbered markers for each burial area and there is seaweed being spread over these areas where burial is complete.

“The active area has a ground net to prevent scavenging by birds. I am aware that the recent fish culls at a number of fish farms has lead to increased activity at the site but found no sign of any impact on the beach or machair. I was shown records that are being kept. They record each delivery, their site of origin and area of burial. Generally the site operation is satisfactory and I have no concerns regarding impact or pollution.”

To try to find out what was really happening, SFPG Chairman Bruce Sandison visited North and South Uist from 31st May to 3rd June. He reveals here the result of that visit and in doing so exposes a tale of mismanagement, intimidation and regulatory failure that implicates the Scottish Executive, Scottish Environment Protection Agency, Western Isles Council and Scottish Natural Heritage; neither does it reflect credit on Marine Harvest or upon dump-site-operator Angus MacDonald, who dispose of dead fish in this way.. The SFPG is now seeking full disclosure of all information pertaining to these matters.

Bruce Sandison of The Salmon Farm Protest Group [reported in September 2005](#):

PRESS RELEASE FOR IMMEDIATE USE " 23rd SEPT 2005
Bogus report from Scottish Environment Protection Agency
More than 300,000 diseased salmon from Marine Harvest Limited fish farms in the Western Isles have been buried in the machair (globally important shell-sand dunes and fields) at Kyles-paible near Bayhead on the Island of North Uist. Marine Harvest continues to use the site to dispose of their sick and dying fish.

When SFPG chairman Bruce Sandison visited and photographed the site on 31st May/1st June there were no disinfection facilities or warning to the public to keep out. Pools of stinking slurry and discarded bags were fly-ridden. Tubs used to transport the dead fish were being washed on the beach, polluting sea-pools. Government bodies responsible for the operation of the site " Scottish Executive (SE), Scottish Environment Protection Agency (SEPA) " deny that the site was in this state. They based this upon a report prepared by SEPA officer, Jamie Hepburn, from Stornoway.

Mr Hepburn claims to have visited the site the day after (2nd June) the SFPG visit, when he found there had been "No recent burials", nor was there "Any smell or evidence of burial". Scottish National Heritage inspected the site on 17th August when they found: "One active pit (approximately 4m x 4m) partly filled with fish and covered with a layer of sand," and there was a typical dead fish smell when standing right next to this open pit."

Three days later, Jamie Hepburn made another visit to the site when he reported: "There had been no recent burial of mortars. There was no smell or evidence of burial."

Bruce Sandison has now written to SEPA requesting a full review of their response to his concerns, and has copied his letter to SEPA chairman Sir Ken Collins, SEPA North Area Board Chairman Professor Brian Clark, and to SNH chief executive officer, Ian Jardine.

Sandison also wrote to Western Isles Council (11th June) under the Freedom of Information Act, seeking answers to his concerns about the operation of the fish dump. Under the terms of the Act, the council is required to respond within 20 working days. As of now, no reply has been received and the matter has been placed in the hands of Scotland's Freedom of Information Commissioner.

Bruce Sandison said: "I am appalled that an official of Scotland's environmental protection agency should have filed what is in my view an entirely spurious, misleading and bogus report, and that the Scottish Executive and SEPA support this report. I honestly believe that this is just another example of the lengths to which government bodies will go to protect the dirty business of fish farming from public scrutiny."

The Scottish Information Commissioner ruled in January 2006 that Western Isles Council (Comhairle nan Eilean Siar) failed to respond to a FOI request from Bruce Sandison of the Salmon Farm Protest Group and ordered disclosure of information on the fish burial site [Whiteshore Cockles] ([Decision 005/2006 Mr Sandison and Comhairle nan Eilean Siar](#)).



Decision 005/2006 Mr Sandison and Comhairle nan Eilean Siar

Request for information relating to marine harvest sites in a fish burial site on North Uist

Applicant: Bruce Sandison
Authority: Comhairle nan Eilean Siar
Case No: 200503176
Decision Date: 18 January 2006

Marine Harvest's dead salmon – dumped in North Uist – may have been infected with the deadly Infectious Salmon Anaemia. Intrafish [reported in November 2004](#):



See all articles

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ISA disease suspected at Marine Harvest Farm

London, UK: The Scottish Executive has confirmed that the presence of Infectious Salmon Anaemia (ISA) is suspected at Marine Harvest's Loch Sheilavaig salmon farm in South Uist.

22 November 2004 9:48 GMT UPDATED 10 July 2012 5:34 GMT

FRS Fish Health Inspectors are currently investigating the affected farm. In a statement, the Scottish Executive confirmed that statutory restrictions are in place controlling the movement into and out of the farm of all fish.

Marine Harvest is working with the Scottish Executive Environment and Rural Affairs Department to minimise any risk and ensure the health of its fish. A Scottish Executive spokesman said inspectors would monitor the situation for six months and take appropriate action should the ISA's presence be confirmed.

The Executive pointed out that EC Scientific Committee on Animal Health and Animal Welfare has concluded that there is no evidence of risk to human health from ISA.

ISA is notifiable under European and domestic fish health legislation, which requires measures to eradicate rather than control the disease. Scotland last saw an outbreak of ISA, which is characterised by high mortality rates, darkening of the liver, severe anaemia and internal haemorrhage in 1998.

Since then, eradication measures including clearance of infected sites and controls on movements of fish in affected areas have succeeded in preventing further instances.

Data published by the [Scottish Government's Fish Health Inspectorate \(2013 to 2020\)](#) – data prior to 2013 is not available - shows that salmon farms in the Outer Hebrides have continued to dump disease-ridden salmon at Whiteshore Cockles over the last decade:

Case No:	2013-0565	Date of visit:	26/11/2013
Time spent on site:	5.5hrs	Main Inspector:	DRS
Site No:	FS1255	Site Name:	North Uiskevagh
Business No:	FB0169	Business Name:	The Scottish Salmon Company
Current mortality disposal via Whiteshore Cockles Ltd, site is looking at anerobic digestion in the longer term.			
2. How are mortalities disposed of?	Landfill		
If other detail:	Whiteshore Cockles		

Case No:	2013-0551	Date of visit:	20/11/2013
Time spent on site:	4 hours	Main Inspector:	SJD
Site No:	FS0398	Site Name:	Clachan Hatchery
Business No:	FB0444	Business Name:	Hebridean Smolts Ltd
2. How are mortalities disposed of?			Landfill
If other detail:			White shore cockles

Case No:	2013-0552	Date of visit:	20/11/2013
Time spent on site:	1.5 hours	Main Inspector:	SJD
Site No:	FS1255	Site Name:	North Uiskevagh
Business No:	FB0169	Business Name:	The Scottish Salmon Company
2. How are mortalities disposed of?			Landfill
If other detail:			Whiteshore Cockles

Case No:	2013-0553	Date of visit:	20/11/2013
Time spent on site:	1 hour	Main Inspector:	SJD
Site No:	FS1254	Site Name:	Outer Eport
Business No:	FB0169	Business Name:	The Scottish Salmon Company
2. How are mortalities disposed of?			Landfill
If other detail:			Whiteshore Cockles

Case No:	2014-0599	Date of visit:	03/12/2014
Time spent on site:	0hrs	Main Inspector:	AJW
Site No:	FS1259	Site Name:	Stulaigh
Business No:	FB0119	Business Name:	Marine Harvest (Scotland) Ltd
How are mortalities disposed of?			Landfill
If other detail:			Whiteshore Cockles
Any disease on site? (since last inspection)			Y
If yes, detail:			HSMI - July/August

Case No:	2015-0365	Date of visit:	26/08/2015
Time spent on site:	0hrs	Main Inspector:	AJW
Site No:	FS0194	Site Name:	Upper Loch Tormasad
Business No:	FB0169	Business Name:	The Scottish Salmon Company

Morts go to landfill to Whiteshore Cockles but are looking into alternative methods for future.

Case No:	2015-0369	Date of visit:	02/09/2015
Time spent on site:	3 hours	Main Inspector:	JET
Site No:	FS0051	Site Name:	Bagh Chlann Neill
Business No:	FB0169	Business Name:	The Scottish Salmon Company

Dead fish waste taken to landfill, whiteshore cockles.

Case No:	2016-0249	Date of visit:	15/06/2016
Time spent on site:	0	Main Inspector:	AJW
Site No:	FS1261	Site Name:	Hellisay
Business No:	FB0119	Business Name:	Marine Harvest (Scotland) Ltd

Morts currently going to landfill, Whiteshore Cockles. They are waiting for the installation of a site incinerator.

Case No:	2017-0335	Date of visit:	30/08/2017
Time spent on site:	4 hours	Main Inspector:	DCB
Site No:	FS0853	Site Name:	Lochmaddy
Business No:	FB0398	Business Name:	Loch Duart Ltd
2. How are mortalities disposed of?			(detail)
If other detail: Landfill, whiteshore cockles			

Case No:	2018-0108	Date of visit:	27/03/2018
Time spent on site:	2 hours	Main Inspector:	ALW
Site No:	FS0643	Site Name:	Langass Hatchery
Business No:	FB0169	Business Name:	The Scottish Salmon Company
2. How are mortalities disposed of?			Other (detail)
If other detail: Landfill at Whiteshore Cockles			
3. Mortality records complete and correctly entered?			Y
4. Recent mortality (last 4 wks):			1,383 in alevins and 3,906 in first feeding fry in last 4 weeks (mainly due to gut fungus)

Case No:	2018-0109	Date of visit:	27/03/2018
Time spent on site:	2.5 hours	Main Inspector:	ALW
Site No:	FS0195	Site Name:	Loch Geireann
Business No:	FB0169	Business Name:	The Scottish Salmon Company

All mortalities are weighed, length taken and pit tag recovered before disposal. Mortalities held at Langass Hatchery before disposal. Recent mortalities due to bird damage.

2. How are mortalities disposed of?			Other (detail)
If other detail: Landfill at Whiteshore Cockles			

Case No:	2018-0111	Date of visit:	28/03/2018
Time spent on site:	5 hours	Main Inspector:	ALW
Site No:	FS1083	Site Name:	Groatay
Business No:	FB0119	Business Name:	Marine Harvest (Scotland) Ltd

Pasteurella skyensis diagnosed on site in December 2017. Mortalities increased post hydrogen peroxide treatment for AGD at end of November and initially thought that increase was related to treatment. Samples indicated that it was at early stage of infection with no chronic signs and decision made to actively remove mortalities to lower infection pressure and not treat with antibiotics. Using ROV to ensure all mortalities are removed.

Mortality levels have been higher at Groatay than at Grey Horse Channel, losing 4.583% since start of December (December - 9,639, January - 8,056, February - 4,185 and March (to date) - 5,033).

Site has had an issue with severe AGD last year and have had several hydrogen peroxide treatments (September, October and twice in November 2017).

2. How are mortalities disposed of?	Other (detail)
If other detail:	Landfill at Whiteshore Cockles

6. Any other peaks in mortality during period checked?	Y
Mortality levels increased during December (range from ~100-700/day/cage, average 311/cage/day), attributed to infection with <i>Pasteurella skyensis</i> . Have lost 4.53% since start of December (24,822).	

Case No:	2018-0112	Date of visit:	28/03/2018
Time spent on site:	5 hours	Main Inspector:	ALW
Site No:	FS1122	Site Name:	Grey Horse Channel
Business No:	FB0119	Business Name:	Marine Harvest (Scotland) Ltd

2. How are mortalities disposed of?	Other (detail)
If other detail:	Landfill at Whiteshore Cockles

6. Any other peaks in mortality during period checked?	Y
Mortality levels increased in December 2017 (range from ~150-300/day/cage, average of 264/day/cage), attributed to <i>Pasteurella skyensis</i> . Have lost 2.48% since start of December (13,699).	
If yes, detail:	
7. Have increased (unexplained) mortalities been reported to vet or FHI?	Y
If yes, detail action:	No treatment for <i>P. skyensis</i> as infection at low level. Removing mortalities to reduce infection pressure

Histopathology examination revealed mild complex gill health with presence of amoeboid-like cells suggestive of amoebic gill disease (AGD) and samples tested positive by QPCR for *Neoparamoeba perurans*. Epitheliocystis was also observed and samples tested positive by QPCR for *Candidatus* Branchiomonas cysticola and *Candidatus* Syngnamydia salmonis. Some vascular damage in the gills and mild hepatic necrosis was also noted.

Due to the gill health issues reported on site, samples were screened for salmon gill poxvirus and *Paranucleospora theridion* (syn, *Desmozoon lepeophtherii*) by QPCR. Samples tested positive for both pathogens.

Vibrio sp. and *Moritella viscosa* were isolated. The level and purity of growth would not suggest these bacteria are implicated in current fish morbidity.

Case No:	2018-0278	Date of visit:	13/08/2018
Time spent on site:	6 hours	Main Inspector:	ALW
Site No:	FS1103	Site Name:	Vuia Mor
Business No:	FB0169	Business Name:	The Scottish Salmon Company

Site inspected following report from company of increased mortality in week 31 due to clinical anaemia. Mortality levels had been low (range of 0.19-0.46% per week over preceding 7 weeks, 0.95% in May and 0.79% in June). Sharp increase in mortality in week 31 to 5.93% and 13.30% in week 32.

Have harvested from site from March through to June, but due to the increase in mortality rates are now harvesting most days to get all of the fish off the site. Have harvested 101,546 fish between 5-12 August. Fish are being transported live to the killing stations at either Arnish or Ardyne.

Mortalities are being disposed at Whiteshore Cockles. Due to mortality levels, the Carly (operated by Fergusons Transport) is on site to collect mortalities with two tankers on the boat holding ~20T each. Fish are removed from the cage using the uplift and pumped into a grab/basket. Once full the grab is lifted over the sealed tanker and the fish are released into the tanker. The boat then travels direct to North Uist and the tankers are taken by road to Whiteshore Cockles.

On site lethargic fish seen in cages with high lice loads and cranial lice damage (estimate 50 - 100 per cage inspected with some worse than others e.g. cage 1). Reported that number of fish with visible lice damage has increased over the last week. Eight lethargic fish, plus two feeding fish removed for sampling.

2. How are mortalities disposed of?	Other (detail)
If other detail:	Whole fish to Whiteshore Cockles
3. Mortality records complete and correctly entered?	Y
4. Recent mortality (last 4 wks):	Wk 29 = 884 (0.35%), wk 30 = 1,043 (0.41%), wk 31 = 14,995 (5.93%), wk 32 = 31,571 (13.3%)

Additional comments:

Fish 1 - Slight lice damage to head, some petechial haemorrhages on gill
 Fish 2 - Smaller, Slight lice damage to head, damaged gill, small number of petechial haemorrhages on liver
 Fish 3 - Slight lice damage to head, some petechial haemorrhages on gill, small number of petechial haemorrhages on liver, spleen pale, liver very pale
 Fish 4 - severe lice damage to head, small white patches on gills
 Fish 5 - severe lice damage to head
 Fish 6 - severe lice damage to head
 Fish 7 - severe lice damage to head, some petechial haemorrhages on gill
 Fish 8 - Slight lice damage to head

The above site was inspected, following a report from the company of a recent increase in mortality, attributed to anaemia. During the inspection of the site, a number of lethargic Atlantic salmon with high lice loads and physical damage were observed. Ten fish were removed for further examination and subsequent diagnostic sampling.

Histopathology examination revealed widespread gill circulatory disturbances in all fish (likely associated with treatments or water insult) and splenic pathology. One fish also showed mild multifocal hepatic necrosis.

Due to the gill health issues reported on site, samples were screened for salmon gill poxvirus, *Noeparamoeba perurans* (the causative agent of amoebic gill disease) and *Paranucleospora theridion* (syn, *Desmozoon lepeophtherii*) by QPCR. Samples tested positive for all three pathogens.

Samples tested positive for salmonid alphavirus and infectious pancreatic necrosis by QPCR, but there was no associated pathology.

A *Vibrio* sp. was also isolated from the gills. The mixed growth would not suggest that it is a primary source of morbidity however the level of growth was significant.



Case No: Date of visit:

Time spent on site: Main Inspector:

Site No: Site Name:
 Business No: Business Name:

Mortality Records

1. Mortality records available for inspection?

2. How are mortalities disposed of?

If other detail:

Case No: Date of visit:

Time spent on site: Main Inspector:

Site No: Site Name:
 Business No: Business Name:

Very little mortality observed on site so disposed of in domestic waste <25kg. In the event of a mass mortality or cull, fish waste would be disposed of by White Shore Cockles.

Case No: 2020-0193 Date of visit: 14/05/2020

Time spent on site: Main Inspector:

Site No: FS0646 Site Name: Soay
 Business No: FB0119 Business Name: Mowi Scotland Ltd

How are mortalities disposed of? Ensiled - on site

If other detail: White shore cockles if too many morts for ensiler

Case No: 2020-0297 Date of visit: 23/07/2020

Time spent on site: 0 Main Inspector:

Site No: FS1233 Site Name: Eughlam
 Business No: FB0169 Business Name: The Scottish Salmon Company

3. How are mortalities disposed of?

If other detail: whiteshore cockles (whole)

Case No: 2020-0284 Date of visit: 22/07/2020

Time spent on site: N/A Main Inspector:

Site No: FS0796 Site Name: Treanay
 Business No: FB0169 Business Name: The Scottish Salmon Company

3. How are mortalities disposed of? Other (detail)

If other detail: Whole fish collected in bins and taken to Landfill by White Shore Cockles.

Case No: 2020-0281 Date of visit: 22/07/2020

Time spent on site: N/A Main Inspector:

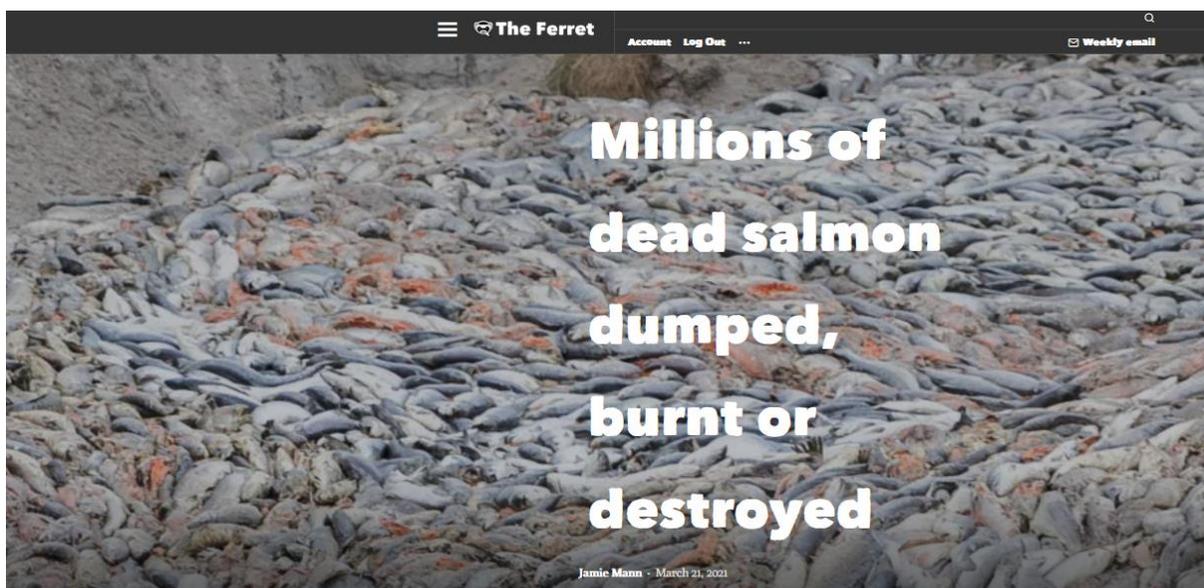
Site No: FS0340 Site Name: Kilervagh (Petersport)
 Business No: FB0169 Business Name: The Scottish Salmon Company

3. How are mortalities disposed of? Other (detail)

If other detail: Whole fish were collected from a skip at the shorebase and taken to landfill by White Shore Cockles.

Mass Mortalities – Millions of Diseased Scottish Salmon Going Up in Smoke (and to Landfill)

The Ferret [reported in March 2021](#) (using a photo of farmed salmon dumped at Whiteshore Cockles):



The Ferret article (21 March 2021) [included](#):

Some 16 salmon farms in the Outer Hebrides sent their dead fish to a landfill on North Uist run by [Whiteshore Cockles](#). The firm is promising to replace the landfill with a processing plant to turn the carcasses into fish oil and fishmeal.

Despite its [guidance](#) to the contrary, the Scottish Government allows fish to be buried at Whiteshore Cockles without being processed first. “Until the processing plant is operational, the site has a derogation to landfill salmon mortalities without processing,” the government told The Ferret.

In 2018 [the government said](#) the system had “taken longer than originally planned” and was expected to be operational later in 2018. However, the plant has not yet opened.

Whiteshore Cockles said that it had spent years “designing and constructing a unique drying system plant” and that engineers would “connect the final pipework to the plant to make it operational” when coronavirus lockdown restrictions were eased.

“The long term target for the fish oil is to have a biofuel production plant on site and to distribute this fuel to the fish farms at a discounted rate to use in their vehicles, as well as using it to power our own generators,” stated the firm’s Ralph Thompson.

“The fishmeal will be used as a fuel for our biomass burner which in turn distributes its heat to the drier.” The plan was for excess energy to be used to heat a community-owned grain drier and fuel sea salt production.

Whiteshore Cockles was also researching ways to turn excess fishmeal into products for the local crofting and fishing community, Thompson said. This would “provide economic and environmental benefits to the local community”.

Thompson added: “The fish farming industry in these islands has helped to stem the tide of depopulation as it employs a high percentage of our working population and provides them with job security and an excellent standard of living.”



In March 2021, [Compassion in World Farming published](#) photos of diseased and dead Scottish salmon including this photo ([sourced from video footage](#)) from Whiteshore Cockles taken in October 2020:





Scottish Salmon Watch [published video footage of mass mortalities at RSPCA Assured salmon farms across Scotland during 2020](#) – despite [legal threats from Mowi to stay away](#).



In March 2021, [Netflix's global hit 'Seaspiracy'](#) featured stomach-churning video footage of [Scottish Salmon Watch](#) lifting the lid on disease-ridden Mowi salmon (certified via [RSPCA Assured](#) and the [Aquaculture Stewardship Council](#)).



Sadly, it is not currently known how many farmed salmon die each year in Scotland due to lobbying by the Scottish Salmon Producers Organisation who persuaded Scottish Environment Protection Agency to stop publishing information in 2013 – [arguing that disclosure of data on mortality numbers was ‘commercially damaging’](#). The Times [reported in September 2013](#):

Environment watchdog ‘gave in to industry’ over dead salmon

Scotland Staff

Monday October 21 2013, 1:02am,
The Times



The scale of salmon deaths has raised issues about the disposal of carcasses
DAVID CHESKIN/PA ARCHIVE/PRESS ASSOCIATION IMAGES

Scotland's environmental watchdog has become the "lapdog" of the fish farming industry after agreeing to keep secret the vast number of farmed salmon killed by disease, it has been claimed.

The Scottish Environment Protection Agency (Sepa) agreed to delete information on more than 8 million dead fish from a public database on fish farming because the Scottish Salmon Producers' Association (SSPO) said that it would be commercially damaging.

Scottish Salmon Watch [estimated in November 2020](#) – [based upon mortality rates published annually by the Scottish Government](#) – that ca. 40 million farmed salmon die annually from ‘hatch to catch’ with a total mortality rate of ca. 50% in the freshwater and sea-phase of salmon farming production.

Read more via:

[Update: 25 Million Mass Mortalities on Scottish Salmon Farms](#)

[52 million deaths in Norway - how many millions died on Scottish salmon farms in 2020?](#)

[Alexa, how many salmon die each year on Scottish salmon farms? 42 million* \(but we don't know for sure as the answer is deemed "commercially damaging"\)!](#)

During [Scottish Salmon Watch's visit to the Outer Hebrides in May 2021](#) dozens of empty containers of the [carcinogenic chemical Formaldehyde \(Formalin\)](#) were discovered at [The Scottish Salmon Company's Langass Hatchery in North Uist](#) and [bins of farmed salmon rejected by The Scottish Salmon Company's Marybank processing plant on the Isle of Lewis](#).

 **Don Staniford**
@TheGAAIA



Video Footage of Carcinogenic Chemicals & Dead Scottish Salmon! tinyurl.com/yxmcum9w
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Please boycott Scottish farmed salmon!
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2:46 PM · May 20, 2021



An [inspection of the Langass Hatchery by the Scottish Government's Fish Health Inspectorate in March 2018](#) reported that mortalities were disposed of at Whiteshore Cocksles.

Case No:	2018-0108	Date of visit:	27/03/2018
Time spent on site:	2 hours	Main Inspector:	ALW
Site No:	FS0643	Site Name:	Langass Hatchery
Business No:	FB0169	Business Name:	The Scottish Salmon Company
2. How are mortalities disposed of?	Other (detail)		
If other detail:	Landfill at Whiteshore Cocksles		
3. Mortality records complete and correctly entered?	Y		
4. Recent mortality (last 4 wks):	1,383 in alevins and 3,906 in first feeding fry in last 4 weeks (mainly due to gut fungus)		

The inspection report also detailed the use of Formalin, gut fungus and how the Langass Hatchery site was used to produce The Scottish Salmon Company's 'Hebridean' strain of fish. "In future the site will receive green ova and milt from the Hebridean broodstock held at Ormsary," [stated the Scottish Government's Fish Health Inspectorate in March 2018](#).

Additional Case Information:

Site used to produce company's Hebridean strain of fish. Broodstock transferred onto site in late spring. Produce eyed ova for production sites and future broodstock

Select 1,000 viable ova from each family for incubation in specially modified comphatch system (trays divided into smaller compartments). Each family is raised in a separate 1m tank. Numbers reduced to 500 at 10g, 250 at 30g and to final 100 per family prior to transfer to Loch Geireann. At this point the fish are weighed, length noted and individually tagged. The families are then mixed in cages at Loch Geireann.

The site is currently being upgraded with a new incubation and holding shed which will be stocked in the next 5-6 weeks. This new facility will have a dedicated incubation area (comphatch systems, buckets and zuger jars) and 200 1m tanks for ongrowing. The tanks are fed by robot with a track above the tanks for the hoppers to move along. The current facility (88 1m tanks) will be dismantled. In addition the square tanks in the other building have been removed and replaced with six 5m tanks and two 4m tanks mainly for holding the broodstock.

Currently have one of the large tanks stocked with 147,000 first feeding fry as reserve fish if needed at another site. Also stripped some sea trout broodfish, but no site was available to grow the ova so the ova were culled.

Broodstock for 2018 and 2019 seasons currently at Treanay, but 2020 broodstock currently at Loch Geireann will transfer to Ormsary Broodstock Unit next month. In the future the site will receive green ova and milt from Hebridean broodstock held at Ormsary. Genetic testing will be undertaken to help improve the line.

Recently had gut fungus in a couple of tanks, but treated with formalin. Fish on site appeared healthy.

Read more via:

[Beware Scottish Salmon's Online Scam!](#)

[Waitrose Challenged on "Complete Traceability" of Native Hebridean Salmon](#)

[Massive Attack on "Rotten Edifice" of 'Scottish' Salmon](#)

[Viking invasion taints 'Scottish' salmon - 90% of eggs now imported](#)

Note to Editors:

[1] Letter from Scottish Salmon Watch (27 May 2021) to Western Isles Council, SEPA, Marine Scotland (copied to the European Commission) calling for an end to the derogation and a stop to dumping farmed salmon in landfill at Whiteshore Cockles – [online here](#)

[2] Letter from Scottish Salmon Watch to the Scottish Information Commissioner (25 May 2021) re. Western Isles Council's failure to reply to a FOI on Whiteshore Cockles – [online here](#)

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

Date: Tue, May 25, 2021 at 12:26 PM

Subject: Appeal re. Western Isles Council's refusal to provide information on Whiteshore Cockles

To: Enquiries <enquiries@itspublicknowledge.info>

Cc: CNES FOI Team <foi@cne-siar.gov.uk>, Tim Langley <tim.langley@cne-siar.gov.uk>

Please find attached an appeal re. the failure of Western Isles Council (Comhairle nan Eilean Siar) to respond to a FOI on Whiteshore Cockles filed by Scottish Salmon Watch on 8 December 2020.

It has been six months since the FOI was filed and despite repeated emails there still has been no reply or even an explanation from Western Isles Council (Comhairle nan Eilean Siar) why no reply has been forthcoming.

You will see from the attached appeal - [online here](#) - that Western Isles Council (Comhairle nan Eilean Siar) has previous 'form' on this issue and were forced by the Scottish Information Commissioner to disclose information on the same site back in 2006.

In the hope of prompting Western Isles Council (Comhairle nan Eilean Siar) into a reply I have copied the FOI team and Tim Langley (Legal Services Manager) into this appeal. Hopefully the Scottish Information Commissioner's time will not be wasted on this simple matter.

Please provide a receipt for this FOI appeal.

Thanks,

Don Staniford
Director, Scottish Salmon Watch



[3] Scottish Salmon Watch reported in March 2021 via “[Revealed: Burned, Buried & Ensiled Scottish Salmon](#)”:

In September 2018, the BBC One Show [broadcast gruesome video footage of a mort burial pit at Whiteshore Cockles in North Uist.](#)



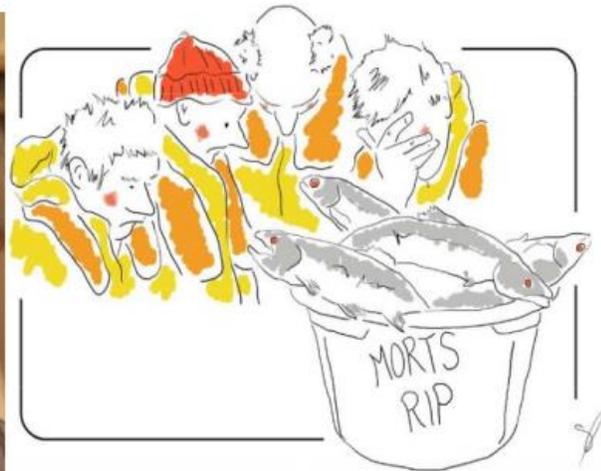
Read more on Whiteshore Cockles via a FOI reply from the Scottish Government [online here](#)

In May 2017, [the Global Alliance Against Industrial Aquaculture reported:](#)

Media Backgrounder: Mort Disposal of Scottish Farmed Salmon (May 2017)

Ewan Kennedy - The €10 Million Mort Man

Following a complaint by Ewan Kennedy of Save Seil Sound to the European Commission in 2013, the UK Government avoided a fine of nearly €10 million (£8.2 million) and "possible daily substantial fines of thousands of pounds for continued non-compliance" for breaching a Directive on the disposal of Scottish farmed salmon mortalities since 2003.



Implementation of the EC Directive - after 13 years of non-compliance by disposing of morts via landfill rather than incineration or ensiling - has cost Scottish landfill sites an estimated £228,149.

Mort disposal costs the industry "at least £2 million per year" but the changes (made from 1 January 2016) may have led to cost reductions for some companies who "will be able to secure low cost contracts with more sustainable processes".

In Shetland, morts are now macerated and ensiled in a central storage point from where the waste is "collected by a specialist waste carrying vessel and taken to Norway for disposal".

Mortalities in 2016 are estimated at 20,000 tonnes (around 10 million farmed salmon) with a mortality rate in the sea of 23.7% (according to the latest data published by the Scottish Government).

Summary:

1) An EC Complaint by Save Seil Sound in 2013 forced the Scottish Government to introduce new rules on mort disposal in 2016



Photo: Dead farmed salmon from a Marine Harvest salmon farm, Isle of Arran

2) The EC Complaint could have cost the Scottish salmon farming industry an infraction fine of €9,666,000 and "possible daily substantial fines of thousands of pounds for continued non-compliance"



3) Since 2003, the UK have breached an EU Directive on the disposal of morts. In 2015, the EC complaint prompted the Scottish Government to [consult on a change of policy to avoid "large fines"](#)

4) In January 2016, the Scottish introduced new '[Guidance on the Disposal of Aquaculture Animal By-Products'](#) and published the new report: "[Zero Waste Report - Finfish Mortalities in Scotland](#)"

5) Mortalities in 2016 are [estimated at 20,000 tonnes \(around 10 million farmed salmon\)](#) with a [mortality rate in the sea of 23.7% \(according to the latest data published by the Scottish Government\)](#)

6) The Scottish Government [proposed a six-month derogation in Shetland](#) (i.e. landfill disposal of morts was allowed in Shetland until July)



[Photo](#): Dead farmed salmon from Grieg Seafood in Shetland

7) An unnamed company in the Western Isles also [requested a six month derogation](#)

8) The Scottish Salmon Producers Organisation [issued 'General Guidance on the Disposal of Fish' in August 2015](#)

Read more via:

[Media Backgrounder: Mort Disposal of Scottish Farmed Salmon](#) (May 2017)

[European Commission complaint over dead fish dumping forces rule change](#) (April 2016)

Scottish Salmon Watch reported in March 2021 via [Media Backgrounder: Waste Disposal Routes for Scottish Salmon - Where Do All the Dead Fish Go?](#):

Media Backgrounder (March 2021):

[Waste Disposal Routes for Scottish Salmon - Where Do All the Dead Fish Go?](#)



Here are the waste disposal routes for Scottish farmed salmon mortalities (data sourced from ‘Case Information’ as [published by the Scottish Government’s Fish Health Inspectorate](#) for salmon farm inspections between September 2019 and December 2020) headed by Dundas Chemicals, ensiling, incineration, Biogas Energen, Whithore Cockles and TWMA Shetland*:

Disposal Method/Location	# of cases cited
Dundas Chemicals	43
Ensiled (on site)	39
Incinerator on site or at other farm location	33
Biogas Energen Cumbernauld (Deerdykes)	28
Whithore Cockles (Uist)	27
TWMA Shetland	19
Shetland Waste to Energy (incinerated)	8
Keenan Recycling (Aberdeenshire)	7
Gask Biogas (Turriff)	6
Gray Composting (Aberdeenshire)	4
SSF yard at Twatt (Orkney) for incineration	4
Pelagia Bressay Shetland	4
SSE Barkip	3
Hazco (Grangemouth)	3
Scottish Water Horizons Cumbernauld	2
Buried on site with permission from SEPA	2
Anglo Scottish Biosolids (Falkirk)	2
DK Waste (composting) South of England	2
Landfill (unspecified)	1
Incinerated on Bressay	1
Domestic waste	1
WI-IWM (Creed in Stornoway)	1
Frozen on site	1
Norwegian boat with on-board ensiler transported to Denmark for biofuel	1

* Note that 242 waste disposal routes were cited out of 220 cases (some cases indicated multiple waste disposal routes depending on the quantities of morts)

Read in conjunction with:

[Revealed: Burned, Buried & Ensiled Scottish Salmon: 'Case Information' traces where ca. 40 million dead farmed salmon are incinerated, dumped, composted, ensiled and turned into pet food](#) (March 2021)

[Casing Where Diseased Scottish Salmon Head After They Die - Data from the Scottish Government's Fish Health Inspectorate](#) (March 2021)

Including:

Whiteshore Cockles hit the headlines in September 2018 when the [BBC One Show featured a burial pit of dead salmon with video footage from Corin Smith](#):



It seems from [‘Case Information’](#) that mass mortalities head to Whiteshore Cockles:

Case No:	2020-0149	Date of visit:	27/03/2020
Time spent on site:	n/a	Main Inspector:	
Site No:	FS1042	Site Name:	Seaforth
Business No:	FB0119	Business Name:	Mowi Scotland Ltd
How are mortalities disposed of?	Ensiled - on site		
If other detail:	Large mortalities meant some had to white shore cockles.		

A [FOI disclosure by the Scottish Government in September 2018](#) included:



Scottish Government
Riaghaltas na h-Alba
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PUBLICATION - FOI/EIR RELEASE

Disposal of mortalities at Whiteshore Cockles: EIR release

Published: **5 Sep 2018**
Directorate: [Agriculture and Rural Delivery Directorate](#)
Part of: [Farming and rural Public sector](#)

Information request and response under the Environmental Information (Scotland) Regulations 2004.

FOI reference: FOI/18/02121
Date received: 7 August 2018
Date responded: 4 September 2018

Published: 5 Sep 2018

Disposal of mortalities at Whiteshore Cockles: EIR release

Please find attached the documents held by Scottish Government on mortalities at Whiteshore Cockles, including correspondence with European Commission and any other documents and information relating to the derogation, disposal system, burial and installation since 1 January 2015.



[FOI-18-02121 - related documents \(part 1\)](#)

12 page PDF | 2.7 MB



[FOI-18-02121 - related documents \(part 3\)](#)

11 page PDF | 2.6 MB



[FOI-18-02121 - related documents \(part 2\)](#)

9 page PDF | 2.5 MB



[FOI-18-02121 - related documents \(part 4\)](#)

10 page PDF | 2.1 MB

FOI disclosure Part 1 included:

EU PILOT 7150/14/SNCO

Request for follow-up

Alleged breaches of Union legislation in relation to the collection and disposal of animal by-products originating from aquaculture establishments in Scotland

Update on progress

The Animal By-Products (Enforcement) (Scotland) Regulations 2013 (ABPR) are now amended by the *Animal By-Products (Miscellaneous Amendments) (Scotland) Regulations 2015*¹ and the instrument came into force on **1 January 2016**. There are two key principles to this instrument:

- It sets out that the remote areas derogation applies to terrestrial livestock animals only to ensure full compliance with European legislation; and
- It also changes how fish mortalities and other aquaculture animal by-product (ABP) waste (from the family *Salmonidae*) can be disposed of in the areas categorised as remote. It is in this legislative context that **fish farms located in remote areas are no longer able to send their waste to a landfill site, or the other means of disposal as set out in Article 19(1)(b) of the EU Control Regulation.**

Report on Finfish Mortalities in Scotland

The Scottish Government funded a project in 2015 looking at Scottish fish farm waste and identifying current waste disposal routes, suitable alternative ABP compliant disposal routes and the existing waste capacity in Scotland. Using the data gathered from engagement across the haulage and waste treatment industries the project identified that where companies are landfilling fish farm waste, they are able to secure ABP compliant and sustainable disposal routes at a lower cost than what they previously paid for landfilling their waste. The report:

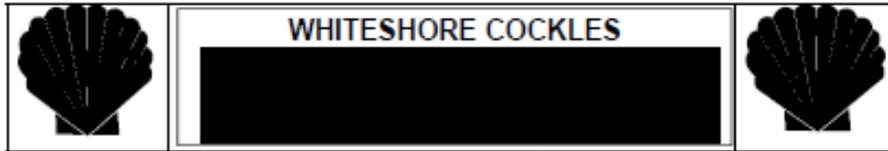
- Provides evidence for suitable alternative ABP compliant disposal routes for Scottish finfish farming waste e.g. incineration, anaerobic digestion, in vessel composting, rendering and the potential of a recently authorised heat treatment and ensilage process from Norway.
- Reviews the capacity already existing in Scotland to receive and utilise this material and the logistics involved for the individual solutions identified. This helps to ascertain if there is the capacity to make the best use of the finfish farm waste produced in Scotland. Recommendations are made on the best options available.
- Identifies other options considered to gain a higher value from this waste.

Whiteshore Cockles Ltd, Bayhead, North Uist

This Western Isles company is seeking a similar 6 month derogation to the landfill ban with the aim of implementing a drying system for the processing of category 2 fish waste and mortalities. They are embarking on an environmentally sustainable alternative to landfill and ensiling of highly putrescible fish wastes and their system has been designed to eliminate any potential risk to human and animal health from the handling, processing and subsequent use of the fish oil and meal. The method of disposal will produce by-products of **fertiliser** and **fish oil** (for use locally on croft land, and for processing into biofuel to operate the drying machinery respectively). This solution will reduce the energy required to process and transport this waste stream and eliminate the need for it to be sent to landfill. **The Scottish Government is satisfied that this process meets the conditions prescribed by Point C (Processing method 3), Chapter III, Annex IV of Commission Regulation (EU) No. 142/2011** and is split into two operations as follows:

- (a) Processing of the category 2 fish wastes in a single batch system that will reduce the particle size of the waste to >30mm and then sterilise this waste at temperatures prescribed by the regulation. The process will then continue heating the waste to dehydrate the solid and liquid waste to less than 5% moisture content;
- (b) The dehydrated and sterilised waste will then be separated into two fractions – oil and meal by the use of a mechanical separation system.

Are you content with this proposal?



09/11/2015

Mr K MacLeod
Animal Health Officer
Comhairle nan Eilean Siar
Stornoway
Isle of Lewis

Dear Mr MacLeod,

Reference : Fish Waste Drier Project , North Uist.

Further to our meeting last week this letter is to give you an update on the Fish Waste Drier Project and our expected timescales.

All the necessary planning consents are now in place and building works could begin as soon as a warrant has been issued. [REDACTED] have been in discussions with AHVLA and the drying process has now been accepted as a method of treating the fish mortalities. However, until the unit is fully operational and samples have been taken of the by products the official approval cannot be issued.

It was our intention to apply to the EMFF for grant assistance with this project and our initial discussions with the Scottish Government all proved positive as the project 'ticks every box' on any environmental or economic scale. However we have now been waiting for the scheme to open for seven months and three deadlines have passed without any definite date being announced. With the ban on using the current burial method coming into effect on the 1st January 2016 we can no longer afford to wait for the EMFF scheme for funding.

Western Isles Enterprise have realised the importance of this project to the local economy and the timescales involved and have now submitted an application to their head office in Inverness requesting approval of a substantial grant towards the capital costs of the project. A decision is expected in late December and as the remaining funding requirements have been approved by the Bank of Scotland we fully expect to get the equipment ordered before the end of this year.

We hope to begin the infrastructure works in March and have the drier unit on site and operational by mid June as there is a four month delivery period on the equipment. As with any new system we would expect teething problems at the start of the processing period and the manufacturer has suggested a time period of three months should be allowed to ensure the plant is fully functional and meeting all the necessary standards of the regulatory authorities.

We would therefore request that an application be made for a derogation to extend the deadline for the end of the burial process at the Bayhead site to September 2016. This extension if granted should ensure that the new process of treating the fish mortalities is fully compliant and operational.

If you require any further information please do not hesitate to get in touch.

[REDACTED]

From: Murdoch I J (Ian)
Sent: 11 November 2015 10:33
To: Macaldowie C (Colin); Ambrose N (Nick) Dr; Jenny.Purcel [REDACTED]
Cc: Cox IDA (Ian)
Subject: FW: Letter from Whiteshore Cockles Ltd

All

Please see the letter from Whiteshore Cockles requesting an extension to the burial derogation for their site. Can I have your comments on how we should reply to this please?

We have wrote to the Commission about extending the derogation for [REDACTED] after receiving a request from [REDACTED]. The request from [REDACTED] set out quite a sound infrastructure plan that required time to put in place.

This requests feels like they have delayed to the last minute, albeit due to waiting for information about possible funding. It does not feel right to me to just allow Whiteshores to continue to bury fish waste at their site. However, they are trying to comply with ABP legislation. I would definitely want to tie them down to an action plan, similar to the [REDACTED] request.

A few questions from me:

- Should we put this request to the fish waste working group?
- Do we also need to inform the Commission?

Another thing to consider is that the fish waste project has identified it would be cheaper for fish farms to send their waste to the mainland. Current landfill costs are £327 per tonne. Future disposal at Gask AD or or Keenan's IVC is £174 per tonne potentially reducing even further once the AD plant on Lewis can take the waste.

Regardless of what we decide, enforcement will be from the Western Isles Council who have been reluctant to do anything about this site in the past.

Ian

From: Macaldowie C (Colin)
Sent: 11 November 2015 10:53
To: Murdoch I J (Ian); Ambrose N (Nick) Dr; Jenny.Purcel [REDACTED]
Cc: Cox IDA (Ian)
Subject: RE: Letter from Whiteshore Cockles Ltd

Hi Ian,

Does all sound a bit last minute. I think we need to let them know that we will be following the same process as for [REDACTED] and that there are no guarantees that the derogation until this is complete.

Best Wishes

Colin

From: Ambrose N (Nick) Dr
Sent: 11 November 2015 16:04
To: Murdoch I J (Ian); Cox IDA (Ian)
Cc: Jenny.Purcell [REDACTED] Macaldowie C (Colin)
Subject: RE: Letter from Whiteshore Cockles Ltd

As discussed – [see below](#)

[Nick Ambrose](#)
[Animal Health - Disease Prevention | Agriculture Food and Rural Communities | Scottish Government | Tel. \[REDACTED\] | Mob \[REDACTED\]](#)

From: Murdoch I J (Ian)
Sent: 11 November 2015 10:33
To: Macaldowie C (Colin); Ambrose N (Nick) Dr; Jenny.Purcell [REDACTED]
Cc: Cox IDA (Ian)
Subject: FW: Letter from Whiteshore Cockles Ltd

All

Please see the letter from Whiteshore Cockles requesting an extension to the burial derogation for their site. Can I have your comments on how we should reply to this please?

We have wrote to the Commission about extending the derogation for [REDACTED] after receiving a request from [REDACTED]. The request from [REDACTED] set out quite a sound infrastructure plan that required time to put in place.

This requests feels like they have delayed to the last minute, albeit due to waiting for information about possible funding. It does not feel right to me to just allow Whiteshores to continue to bury fish waste at their site. However, they are trying to comply with ABP legislation. I would definitely want to tie them down to an action plan, similar to the [REDACTED] request.

A few questions from me:

- Should we put this request to the fish waste working group? **Yes, the group should know about developments and they would be interested to know about the opportunity of the fish drier project (and the possibility of EMFF support), so put this in the reply and**
- Do we also need to inform the Commission? **Yes, we should be consistent**

Another thing to consider is that the fish waste project has identified it would be cheaper for fish farms to send their waste to the mainland. Current landfill costs are £327 per tonne. Future disposal at Gask AD or or Keenan's IVC is £174 per tonne potentially reducing even further once the AD plant on Lewis can take the waste.

Regardless of what we decide, enforcement will be from the Western Isles Council who have been reluctant to do anything about this site in the past.

Ian

FOI disclosure Part 2 included:

From: Murdoch I J (Ian)
Sent: 17 November 2015 08:53
To: 'GSX - Kenny MacLeod | G'
Cc: Cox IDA (Ian); Ambrose N (Nick) Dr; Macaldowie C (Colin)
Subject: RE: Letter from Whiteshore Cockles Ltd

Kenny

Thank you for sight of the letter from Whiteshore Cockles Ltd seeking a formal burial derogation extension for their Bayhead site until September 2016.

As you are aware the Scottish Government is amending the Animal By-Products (Enforcement) (Scotland) Regulations 2013, and for the provisions to come into force as of 1 January 2016. Once amended, these Regulations will specify to which species of animals the remote areas derogation should apply, so fish farms located in remote areas will no longer be able to send their waste to a landfill site, or the other means of disposal listed in Article 19(1)(b) of the EU Control Regulation (EC) No 1069/2009. The amended Regulations will therefore ensure full compliance with European legislation.

Whiteshore contends that a derogation extension would allow them to put the necessary infrastructure in place to provide them a suitable alternative route for disposal of category 2 waste. For their proposal to proceed the Scottish Government would need to make a case to the European Commission for their approval. There is precedent in that there a similar proposal has recently gone forward to the Commission from a [REDACTED] producer. That proposal has however set out a sound infrastructure plan, the key issues being faced by [REDACTED], and the plans that are in place for alternative disposal routes for category 2 waste. This plan will also not be operational until end-June 2016, but it does outline a relatively persuasive case for an extension, and moreover how it will allow the producers sufficient time to put the necessary infrastructure in place. The proposals also sets out clear milestones in the run-up to the proposed end date.

On this basis we would welcome a similarly more structured approach from Whiteshore on their proposals and it would clearly be in Whiteshore's interests if they were to make a more robust case in its argumentation for a derogation extension.

As I mentioned on the phone to you, I have taken on a new role within the Animal Health and Welfare Division and will no longer be the policy lead for animal by-products. My colleague Ian Cox recently joined the Division at the start of November to take over this role from me and I would be grateful if you could reply to him. Ian can be contacted on [REDACTED] or by email at [REDACTED]

Ian

From: Purcell, Jenny (APH [REDACTED])
Sent: 23 November 2015 08:42
To: Murdoch I J (Ian)
Cc: Macaldowie C (Colin); Ambrose N (Nick) Dr; Cox IDA (Ian)
Subject: RE: Letter from Whiteshore Cockles Ltd

Hi Ian
(cc: as before)

I agree with Nick's suggestion.

Whiteshore Cockles have been discussing this proposal with [REDACTED] for over a year. They have also been in discussion with APHA about approval. They do appear to be serious about the proposal.

Like you, I have reservations about Whiteshore Cockles' continuing use of an unofficial landfill site. Would it be appropriate to get a report from the Local Authority on how the landfill site has been operated over the past 18 months?

Best wishes,
Jenny

Jenny Purcell BVSc PhD MRCVS
Veterinary Officer
APHA Hamilton Field Services

Animal and Plant Health Agency (APHA)

Telephone: [REDACTED] Mobile: [REDACTED] | Email [REDACTED]

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

Address: c/o APHA Galashiels Field Services, Cotgreen Road, Tweedbank, Galashiels, TD1 3SG

From: Cox IDA (Ian)
Sent: 07 January 2016 10:34
To: [REDACTED]
Cc: Murdoch I J (Ian)
Subject: RE: Automatic reply: Extension to burial ban

Hi [REDACTED]

Yes no problem. Just to recap there has still been no word back from the Commission. Whilst the legislation changed on 1 January we are just working on the assumption that the application for the derogation will be accepted. I hope this helps clarify the situation even if we are still waiting for an official line.

Will be in touch

Thanks again

Ian

IAN COX
Scottish Government | Animal Health and Welfare Division | Disease Prevention Team | P Spur | Saughton House | Broomhouse Drive | EDINBURGH | EH11 3XD
[REDACTED]

From: [REDACTED]
Sent: 07 January 2016 09:47
To: Cox IDA (Ian)
Subject: Re: Automatic reply: Extension to burial ban

Hi Ian

Thanks for the chat this morning and sorry for starting your year off with a problem.

I will have to send off an email to the fish farms today to keep everybody happy and up to date with proceedings.

Is it possible for you to send me a one line email giving consent for us to "carry on as usual" as discussed so I have it in writing in case of any feedback.

Thanks again for your assistance.

Regards

[REDACTED]

The FOI disclosure Part 3 included:

From: Cox IDA (Ian)
Sent: 22 January 2016 09:46
To: kennymacleo [REDACTED]
Cc: Murdoch I J (Ian)
Subject: RE: Whiteshores

Hi Kenny

We heard back from the Commission recently but in their response they didn't give any opinion on the derogation request unfortunately. The ball is back in our court so we need to go back to them with a further update basically reiterating our previous points. This update will go to the Commission early February.

So in a nutshell we're no further forward *but* this should in no way impact on Whiteshore's proposals and I've stressed that point to [REDACTED] – proceed as before and as if the Commission is content with what is proposed until we get a definite steer.

Hope this is helpful and if we hear anything further I will of course be in touch.

IAN COX

Scottish Government | Animal Health and Welfare Division | Disease Prevention Team | P Spur | Saughton House | Broomhouse Drive | EDINBURGH | EH11 3XD

From: Kenny MacLeod | G [REDACTED]
Sent: 21 January 2016 16:24
To: Murdoch I J (Ian)
Subject: Whiteshores

Hi Ian and HNY

Sorry to bother you with this but I don't have the details of the person filling your old post although I'm sure you told me who it was!!

I was wondering, from our enforcement hat on, what's happening with Whiteshores derogation request? I suspect they are still using that site for burying mortis.

Could you forward this on to the person who deals with this now and, again, sorry to have bothered you Kenny

From: Cox IDA (Ian)
Sent: 23 March 2016 12:39
To: [REDACTED]
Subject: RE: Derogation

[REDACTED]

Despite the delay there's good news – we've now had confirmation from the European Commission that they are satisfied with the derogation measures as proposed. Whilst there are no planned [DG Health and Food Safety](#) missions to the UK looking at animal by-products on the immediate horizon, they may of course choose to revisit this for inspection purposes at some point further down the line. That's a big if but in the meantime you have the green light nonetheless.

Best wishes

Ian

IAN COX | TSEs and Animal By-Products
Disease Prevention Team | Animal Health and Welfare Division (P Spur)
Directorate for Agriculture Food and Rural Communities | Scottish Government
Saughton House, Broomhouse Drive, EDINBURGH, EH11 3XD

From: Cox IDA (Ian)
Sent: 15 July 2016 11:15
To: [REDACTED]
Subject: RE: Derogation

Hi [REDACTED]

Thanks for the update and that the timeline for progressing the works remains on track to be fully operational by the end of the year. In terms of the implications of the EU Referendum it is still business as usual and this is the usual SG line – *"the UK remains a full member of the European Union until Art. 50 negotiations conclude, and therefore currently remains subject to all responsibilities and obligations of membership."*

Appreciate that Brexit *may* change things but it really is too soon to speculate at this stage.

Thanks for the update and we'll keep in touch.

Ian

Ian Cox | Animal Health and Welfare Division: Disease Prevention Team (TSEs and ABP Policy)
Scottish Government | Saughton House (P Spur), Broomhouse Drive | EDINBURGH | EH11 3XD [REDACTED]

From: [REDACTED]
Sent: 15 July 2016 09:36
To: Cox IDA (Ian)
Subject: Re: Derogation

Hi Iain

Good to hear from you.

We are starting the infrastructure work next week and hope to get the drier order finalised before the end of the month. We are waiting for confirmation from [REDACTED] that they want us to process their Category 2 waste as well as the morts so we can get the disinfection equipment finalised. I am keeping in touch with Vivien Taylor but things are almost there.

We have told all the fish farms that our deadline to be fully operational is the end of the year.

In England at the moment but will keep you updated, Does Brexit affect anything ?

Regards [REDACTED]

The FOI disclosure Part 4 included:

From: Cox IDA (Ian)
Sent: 04 August 2016 15:48
To: kennymacleo [REDACTED]
Subject: RE: Whiteshores

Hello Kenny

Resending this as the SG servers say the email I sent this morning failed to be delivered.

Must have been crossed wires because I thought I'd emailed you back in March? No matter the bottom line is that we got confirmation from the European Commission just before Easter that they were satisfied with the derogation measures as proposed. Whilst there were no planned DG Health and Food Safety missions to the UK looking at animal by-products on the immediate horizon, they may of course choose to revisit this for inspection purposes at some point further down the line.

I was speaking with [REDACTED] the other week and he was saying that they were starting the infrastructure work soon?

Ian

IAN COX | TSEs and Animal By-Products
Disease Prevention Team | Animal Health and Welfare Division (P Spur)
Directorate for Agriculture Food and Rural Communities | Scottish Government
Saughton House, Broomhouse Drive, EDINBURGH, EH11 3XD

From: [REDACTED]
Sent: 13 December 2017 17:39
To: Cox ID (Ian)
Subject: North Uist

Dear Ian

Hope all is well with you.

Due to the current publicity regarding the transportation of salmon morts on the mainland I am giving the fish farms a report on our drier project and thought I should keep you updated.

Our infrastructure is now completed and the construction of the building to hold the plant is well under way and will be completed by the New Year. Our drier system will be up and running by April hopefully with the commissioning being completed by the summer.

The fish farms in Lewis and Harris are keen for us to treat their mortalities due to the recycling process and the extra quantity has meant that we have had to recalculate all our figures and upgrade the proposed facility to include a biomass burner. This has taken an age to arrange and the extra costs which are extreme have meant that we have had to rearrange finance which has also been a slow process.

Thank you for your support and patience and I am sure that you are happy that we are on the final lap. I will also update SEPA and Vivien Taylor with our completion timescale.

Best regards

[REDACTED]

From: [REDACTED]
Sent: 19 December 2017 16:57
To: Cox ID (Ian)
Subject: Re: North Uist

Hi Ian

Yes I have updated all the interested parties. Everything should be up and running by May/June.

I have contacted SEPA and Vivien Taylor in Inverness so we can start all the paperwork for any emissions (only purified water) and the licence etc that Vivien needs to approve.

It has taken us three years to get everything confirmed but thankfully we are now on the homeward run.

How did the other areas get on ? Haven't heard what [REDACTED] decided on in the end .

The bad publicity that the "One Show" generated last week has highlighted the transport issues which makes our " local solution for a local problem" even more important.

Thanks again for your patience and will keep you updated.

> On 19 Dec 2017, at 16:42, [REDACTED] wrote:

>

[REDACTED]

>

> Thanks for the update. Are you keeping in regular contact with Western Isles council too? It is important that we progress this as quickly as possible as the derogation cannot go on indefinitely.

>

> Best wishes

>

> Ian

>

>

>

>

>

>

> Ian Cox | Animal Health and Welfare Division | Disease Prevention Team

> (TSEs and ABP Policy) P Spur | Saughton House | Broomhouse Drive |

> EDINBURGH EH11 3XD Tel [REDACTED]

.

From: [REDACTED]
Sent: 31 May 2018 14:12
To: Cox ID (Ian)
Subject: Whiteshore Fish drier.

Good afternoon Ian,

Hope all is well and you are enjoying the same excellent weather as the Hebrides.

I am just updating all interested parties on our ongoing Fish Drier Project.

We have now completed all the infrastructure i.e new road, over an acre of concrete laid for bio-security isolation units [REDACTED] and the building is now erected awaiting the concrete floor etc.

The design / size of the drier unit and ancillary equipment has now been completed and agreed with the supplier and we are just awaiting confirmation on the final costs before ordering for delivery which will be as soon as possible.

This has been a huge and long running project which has grown "arms and legs" since we decided to go with the Dryer system two years ago. All the major fish farms are looking at how to deal with their mortalities in the quickest and most environmentally friendly way due to some recent bad publicity. To this effect we have now agreed to treat the mortalities from [REDACTED] [REDACTED] with the possibility of [REDACTED] to follow. They all agree that a local solution for a local problem is the best way to go and with our recycling plant helping the local economy in several ways it is a win win situation for the community and the Fish Farm operators. I have attached some information on the drier system that we are ordering.

These negotiations have however taken an age to complete and we could not order the final equipment until we knew the projected tonnage that we would have to deal with.

Thank you once again for your support and patience whilst we have been working on this project. It has been much appreciated and I am sure you will be delighted (as we all are) that we have reached the final hurdle with the winning post now in sight.

Best regards

[REDACTED]

[REDACTED]

A [FOI disclosure by SEPA in September 2019](#) included:

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Ref Number	Title	Date
F0190855	Finfish- Whiteshore Cockles Ltd, Uist	06/09/2019

- Description:**
With respect to the salmon landfill site run by Whiteshore Cockles in Uist: • What correspondence has taken place in 2019 between SEPA and Comhairle nan Eilean siar with regards to this site • What correspondence has taken place between SEPA and Whiteshore Cockles in 2019 • How many visits have SEPA officials made to the site in 2019. • What tonnage of morts have been disposed of in this site in 2019 and from where did they come • What plans are in place to ensure the site closes and what timescale does this involve.
- Information:**
Please refer to response letter
- Related documents:**
 - [F0190855 Response Letter - redacted](#)

- What correspondence has taken place in 2019 between SEPA and Comhairle nan Eilean siar with regards to this site

SEPA does not hold any correspondence regarding fish burial.

- What correspondence has taken place between SEPA and Whiteshore Cockles in 2019

SEPA does not hold any correspondence regarding fish burial.

- How many visits have SEPA officials made to the site in 2019.

There have been no visits to the site in 2019.

- What tonnage of morts have been disposed of in this site in 2019 and from where did they come

SEPA does not hold any information on morts at the site.

- What plans are in place to ensure the site closes and what timescale does this involve.

SEPA does not hold any information as we do not regulate the burials on site.

A 2018 report [published by the University of Flensburg](#) stated:

3.7.3 Ban on Fish Waste Disposal to Landfill

Scottish Government will be banning the disposal of biodegradable municipal waste from beginning 2021 but in the case of Western Isles in Scotland, the ban will be implemented from 2026 (The Scottish Government, 2012, p. 11). The fish waste generated from retail shops and food factories dealing with meat and meat-based products are allowed to dispose 20 kg/week animal waste coming from healthy animal bodies into the landfill (APHA, 2014, p. 30). Furthermore, the Scottish regulation also has provision of derogation which allows animal waste to be disposed in landfill. Article 16(d) from European Commission regulation 1069/2009, provides provision of derogation for disposal of animal waste (Fish Waste) for remote areas like parts of CNES. Areas located within CNES has been termed as remote areas in Scotland (The Scottish Government, 2013, p. 6). Furthermore, article 19(b) from same regulation states that in remote areas animal waste can be disposed by burning, burial or by other means such as landfill, but only under the supervision of competent authority (European Commission, 2009, p. 18)& (European Commission, 2009, p. 19). It is due to this provision that the fish waste producing facilities are still being disposed in landfill at Isle of Lewis. These provisions might continue until the government decides to make amendments in existing regulation.

A report – “[Finfish Mortalities in Scotland](#)” – published by Zero Waste Scotland in 2016 included:

Executive Summary

Overview

Aquaculture is a growing industry in Scotland with farmed salmon being the largest food export from Scotland, accounting for around 40% of total value¹. A natural consequence of finfish farming is fish mortalities (morts). Morts are normally classed as Category 2 animal by-products (ABPs) and must be disposed of in a safe and environmentally responsible manner in accordance with the Animal By-Product (Enforcement) (Scotland) Regulations 2013 (ABP(E)(S)). Examples of suitable disposal options are incineration, rendering, in vessel composting (IVC) or anaerobic digestion (AD), all of which must take place in plants approved under the ABP(E)(S) regulations or the Waste Incineration Directive.

In 2013, the Scottish Government implemented a derogation that allowed the disposal of ABPs by burning or burial on site or by other means under official supervision in remote areas. This meant that both terrestrial and aquatic mortalities generated within these ABP remote areas could be disposed at suitably supervised landfill sites. Since almost all fish farms in Scotland fall within these remote areas, some have taken the landfill option. However, the interpretation of this derogation has recently changed, and from 1st January 2016 it applied only to terrestrial livestock. Under this policy, the aquaculture industry now need to ensure that fish farms located within the ABP remote areas are disposing of their waste in accordance with ABP legislation i.e. it can no longer be disposed of in a landfill site. Although this may present some immediate logistical challenges to the aquaculture sector, it should also present a number of opportunities through valorization of aquaculture wastes.

The report included:

Alternatives to landfill

Anaerobic Digestion and In Vessel Composting Capacity

AD and IVC sites processing ABP material to European standard and approved to do so by APHA can accept and process Cat 2 fish mortalities. It is the duty of the fish farm to produce commercial documents that comply with the ABP legislation ensuring the haulier receives a copy and the original is supplied to the destination premises, the haulier should ensure that the documentation is in place. However, it should be noted that Cat 2 fish mortalities that are produced as a result of notifiable disease will need to be disposed of in compliance with the legislation that applies for that disease in addition to the ABP legislation. During the course of this report, questions have been raised that current pasteurisation processes used in AD and IVC facilities for Category 2 fish morts, may not meet the requirements of European regulations and from a hazard/risk assessment perspective may not be sufficient for managing the risks associated with fish pathogens. This has been discussed in detail with the Scottish Government which is content with its current position and interpretation.

In terms of managing fish farm morts, all seven operational ABP registered AD facilities in Scotland were contacted, suggesting that there is existing capacity to take the annual 10,000 tonnes of morts. One large AD facility stated that it could accept the entire annual tonnage of morts, whilst others stated that they could each accept a proportion. The Western Isles dry AD facility is currently unable to process morts, but this may change in the future. The Northern Isles face more of a challenge, and although AD options are actively being considered, these will take some time to come to fruition. On Shetland, the Energy from Waste (EfW) facility is reducing the quantity of fish farm waste that it takes, and this means that in the short-term morts from both Shetland and Orkney will need to be hauled to the mainland for disposal.

The Impacts on Rural Landfill Operators

Ten remote landfill site operators were contacted (using the most recent, SEPA, 2013 database) to quantify the economic impacts that will result from the change in regulations, prohibiting the landfilling

of fish farm waste. The tonnages identified amount to approximately 23% of the estimated arisings of fish mortalities in the country, with the loss of income for Scottish landfill sites as a whole, shown to be £228,149.

The Costs to Fish Farmers Associated with the Loss of Landfill as a Disposal Option

The data generated from engagement across the haulage and treatment industries indicates that where companies are landfilling fish farm waste at licensed landfill sites, they are already able to secure lower cost contracts with more sustainable processes – and will be able to continue doing so once the landfill prohibition is in place. This applies to both routine mortalities and mass mortality events. The potential to reduce cost even includes hauling to the Widnes incinerator, with the exception of fish farm waste currently landfilled on Shetland. In this case, on the basis of currently installed infrastructure, a lower cost option would be dependent on the mainland AD and IVC infrastructure being able to take Shetland's fish farm waste. For the fish farms in all of the regions identified, lower cost options than hauling to Widnes for incineration are available, if the infrastructure is able to accept the waste.

Consequences of the Removal of the Derogation Allowing Landfill

The consequences of removal of the derogation fall only on those companies that operate in areas where landfill is presently a major disposal option. This applies especially to the Uists and Shetland but also to parts of Argyll.

In the Uists it would appear that the majority of mortalities are presently disposed of to landfill. The respondents operating on the Uists are considering ensiling on-site, followed by transport off the islands to Widnes. They are also considering on-site incineration, with one technology provider indicating that there were currently plans for the installation of a number of their plants (six units) on the Uists. On Benbecula, planning permission has been given (2014) for what is classified as a small-scale thermal treatment facility (incinerator) capable of processing 2,600 tonnes per annum of fish waste, with the developer indicating that the plan is for this to be operational in 2016 (see Section 5.6).

Engagement with a haulage contractor has identified that they also take shipments of fish farm mortalities from the Western Isles, managing both ongoing production tonnages, as well as those associated with mass mortality events – the feedback from this company was that none of these were sent to landfill, and all were sent to Widnes for incineration. Again, for the Western Isles as a whole, another option being considered at the moment (September 2015) includes anaerobic digestion at the Stornoway facility, if this facility can be upgraded to process Category 2 and 3 fish farm waste.

In Shetland, the majority of morts go to landfill at present, with some, a small quantity (see Section 5.6), going to the thermal treatment facility in Lerwick. One respondent intends to replace this with incinerators at all sites while another will request a period of grace before being able to use a proposed new AD plant in Lerwick (possibly opening in October 2017). All understood that it was possible that mass mortality events might have to involve disposal on the mainland, although they expected that this would be very expensive, so a local solution was considered the best way forward. Other logistics companies have expressed their interest in establishing consolidation facilities, to bulk

up waste from various locations, including Shetland, storing this for the most cost effective shipments possible, potentially by boat, to their end destinations (see Section 5.7).

In Argyll, only one company presently uses landfill as a major disposal route and is considering either moving to ensiling or installing incineration as future options. All respondents operating in Argyll expressed a keen interest in a local AD solution for their mortals disposal.

Freshwater Sites

In general, freshwater sites use ensiling for storage of mortals. Most dispose of these at the Widnes incinerator and one respondent uses an AD plant. Typically, the volumes are very small requiring only ca. annual pick-up of ensiled material.

Costs for Disposal

Landfill costs were expressed as £130-300/t on island sites to £500-550/t in Argyll.

Incineration on site is typically done with incinerators which can process a maximum of 50kg/h. Incinerators of this size, presently in use, include models which have fuel requirements of the order of 10 litres of oil/diesel per hour¹⁰. Actual costs for on-site incineration are not recorded by any of the respondents. It was commented by one stakeholder that, in practice, some sites may use waste wood locally available, which results in no additional fuel being required.

Costs provided for the management of fish waste to off-site incinerators (the Widnes Incinerator) ranged from around £150/t for mainland fish farm sites to £300/t for island sites (for one respondent).

Indicative costs of disposal through AD were given as between £50 and £60/t. The total cost of disposal of a 26 tonne tanker from Orkney was around £4k (£153/t). A Shetland respondent expected a considerable saving over present landfill costs (£180/t).

The total cost to the industry of mortality disposal is not known. However, if average current costs of disposal are conservatively estimated at greater than £200/tonne then, with an average of around 10,000 tonnes of mortalities, the industry cost is at least £2M per year.

Analysis of Revenue Loss for Remote Landfills

It should be noted that it is known that four landfill sites currently accept fish mortalities, as summarised below:

- Council run landfill at Bennadrove, Western Isles.
- A North Uist site.
- A Shetland Council operated site, at Gremista.
- Shanks operated sites in Argyll and Bute.

Table 9 **Error! Reference source not found.** summarises the charging levels and income streams, to show the loss of income associated with the future prohibition of fish farm mortalities from landfill. This is not presented as a conclusive, statistics analysis of tonnages (outwith the scope of work of this project), with confidence levels being provided etc, Instead the information provided, for licensed landfills, indicates the loss of income for those landfill sites which have responded to the consultation and which have indicated that they are taking fish farm waste – the data is presented on a regional basis and, in effect with landfill tax being paid to the government, the loss of income to the landfill site operators is the gate fee indicated.

Table 9. Summary of Income Generated by the Licensed Waste Management Landfilling of Salmon Mortalities

Region	Mortality Tonnes	Landfill Tonnage	% Landfill	£ Landfill Tax/T	£ Landfill Gate Fee / T	£ Total Landfill Cost	Total Tax	Total Gate Fee
W. Isles	2,252	250	11.10%	82.6	189	67,816	20,553	47,263
Highland	2,205	0	0.00%	n/a	n/a	n/a	n/a	n/a
Shetland	3,298	1,700	51.55%	82.6	85	285,090	140,420	144,670
Orkney	581	0	0.00%	n/a	n/a	n/a	n/a	n/a
Argyll	1,662	366	22.02%	82.6	99	66,447	30,232	36,216
TOTAL	9,998	2,316	23.16%			419,353	191,204	228,149

The tonnages identified amount to approximately 23% of the estimated arisings of fish mortalities in the country, with the loss of income for Scotland as a whole, shown to be £228,149.

Read more via [The Ferret](#):

