

[Scottish Salmon Watch](#), 27 June 2018

EXPOSED: Gruesome Photos of Deformed & Diseased Scottish Salmon

Photos obtained via Freedom of Information (FOI) from the Scottish Government reveal for the first time the shocking scale of deformities, diseases, lice damage and welfare abuses on salmon farms across Scotland. View the gruesome photos of Scottish salmon exclusively [online now via The Ferret \[1\]](#).



[Scottish Salmon Watch](#) finally obtained the shocking photos on 15 June following a review by Marine Scotland who in March initially refused to disclose the images falsely claiming that the photos are "already publicly available and easily accessible" [2].

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



A dossier is available online via [Hard Evidence - Photos of Diseased & Deformed Scottish Salmon \(June 2018\)](#) (see Note 1 for a Summary).

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



[Scottish Salmon Watch](#) is now using the damning photographic evidence to file a case against Marine Harvest, The Scottish Salmon Company, Scottish Sea Farms, Cooke Aquaculture, Grieg Seafood and Loch Duart for [breaches of the Animal Health & Welfare \(Scotland\) Act 2006](#) citing violations under '[Unnecessary Suffering](#)' and '[Cruel Operations](#)'.



"The ugly truth is that Scottish salmon is diseased, deformed and comes from farms where welfare abuse is truly shocking," said Don Staniford, Director of [Scottish Salmon Watch](#). "These gruesome photos are eye-popping, jaw-dropping and stomach-churning. People buying Scottish salmon should seriously question supporting such a cruel form of food production. The camera never lies, unlike companies deceptively marketing 'fresh', 'healthy', 'responsibly sourced', 'organic' and 'welfare-friendly' Scottish salmon. Shame on Scottish salmon farmers and shame on supermarkets for supporting such an ethically bankrupt form of farming. Scottish Salmon Watch will be filing a legal challenge against Scottish salmon farmers for breaches of the Animal Health & Welfare (Scotland) Act 2006. The welfare abuses so graphically illustrated here clearly paint a horrific picture of 'unnecessary suffering' and 'cruel operations'. Scottish Ministers and the Animal and Plant Health Agency must now take immediate action against the welfare nightmare on salmon farms across Scotland."



The photos were taken by the [Scottish Government's Fish Health Inspectorate](#) during inspections of salmon farms during 2018, 2017, 2016 and 2015 conducted under the Aquaculture and Fisheries (Scotland) Act 2007. The FOI disclosure relates to 30 inspections including 15 at Marine Harvest, 4 at The Scottish Salmon Company, 3 at Scottish Sea Farms, 3 at Cooke Aquaculture, 2 at Grieg Seafood and 2 at Loch Duart (with one inspection currently unknown - [Case Information will be published in July 2018](#)).



[Photo: The Scottish Salmon Company's salmon at Meall Mhor, Loch Fyne \(2018-0113\)](#)

Groatay 2018-0111



[Photo: Marine Harvest's salmon at Groatay, Sound of Harris \(2018-0111\)](#)



[Photo: The Scottish Salmon Company's "fresh" salmon at Meall Mhor, Loch Fyne \(2018-0113\)](#)

Marine Harvest, The Scottish Salmon Company, Scottish Sea Farms, Cooke Aquaculture and Loch Duart are all [members of the Scottish Salmon Producers Organisation](#) (Grieg Seafood was [expelled in 2014 following a breach of bio-security](#)). The SSPO [claim on their web-site](#) that "78% of Scottish salmon is now farmed to the RSPCA's higher welfare standards" with salmon farming companies [paying the RSPCA an estimated £1 million per year for certification](#).

Marine Harvest, The Scottish Salmon Company, Scottish Sea Farms, Cooke Aquaculture, Loch Duart and Grieg Seafood are all represented on the [RSPCA's Salmon Standards Technical Advisory Group](#) - with [former Marine Harvest employee Ian Michie in charge of the RSPCA's assessment of salmon farms](#). Earlier this week it was revealed that the SSPCA has [elected Ronnie Soutar, Head of Veterinary Services at Scottish Sea Farms](#), as its new chairperson claiming that the industry's "focus is very firmly on how to keep the salmon happy and healthy throughout their lifecycle".

Marine Harvest is the [exclusive salmon supplier for Sainsbury's](#) and is also understood to [supply Waitrose](#). [100% of Marine Harvest operations are certified as welfare-friendly by RSPCA Assured](#). The Scottish Salmon Company is [accredited to Label Rouge and the Federation of Chefs](#) with the ['Lochlander' brand aimed at the US market](#) and ['Tartan Salmon' aimed at French consumers](#).

Scottish Sea Farms is the [exclusive supplier for Marks & Spencers 'Lochmuir' salmon](#) ([exposed as a fake brand](#)) which is "[always made in a high welfare production system](#)" and [claims to be Freedom Food/RSPCA monitored](#). Cooke Aquaculture is [certified as 'organic'](#)

[via the Soil Association](#) and also [boasts accreditations including RSPCA Assured, Label Rouge and Whole Foods.](#)

Grieg Seafood [serves the UK market via Ocean Quality UK](#) (supplying Tesco via Seachill) and [claims to adhere to "strict" fish welfare based on international standards.](#) Loch Duart is [accredited by RSPCA Assured and Label Rouge](#) and has been [served around the world](#) and [endorsed by top chefs](#) including [Gordon Ramsay, Rick Stein and Raymond Blanc.](#)

In May 2018, following evidence of early harvesting due to disease and mortalities at Scottish salmon farms, Scottish Salmon Watch [wrote to Scottish Ministers asking if there had been breaches of the Animal Health & Welfare Act \(Scotland\) 2006.](#)

"The deaths, deformities, diseases and flagrant abuse of animal welfare on Scottish salmon farms raise the question whether a prosecution could be made via the [Animal Health and Welfare \(Scotland\) Act 2006,](#)" wrote Scottish Salmon Watch in a [letter to Scottish Ministers dated 29 May 2018.](#) "Looking at the legislation it seems clear that given the suffering on Scottish salmon farms and mass mortalities that a strong case against 'Unnecessary Suffering' and 'Cruel Operations' could be made."

Armed with this new photographic evidence and further [Case Information from the Fish Health Inspectorate](#) due to be published in July 2018, [Scottish Salmon Watch](#) will be filing a legal challenge against Scottish salmon farms for breaches of the Animal Health & Welfare (Scotland) Act 2006.

Read more via:

[Letter to Scottish Ministers re. Welfare Abuses at Scottish Salmon Farms](#)

[Deaths, Deformities & Welfare Abuse at Scottish Salmon Farms - Breach of the Animal Health & Welfare \(Scotland\) Act?](#)

[EXPOSED: Early Harvesting at Scottish Salmon Farms Due to Disease & Mortalities](#)

[Hard Evidence: Dossier of Data on Lice, Diseases & Mortalities at Scottish Salmon Farms](#)

[Scottish Salmon's Mort Mountain Leaps Over 10 Million - FOI reveals 2.3 million dead salmon at Marine Harvest farms in 2017](#)

[Photo Gallery: Dead Salmon from Scotland's Disease-Ridden Salmon Farms](#)



In Norway, there has been at least one prosecution of a salmon farmer for violation of the [Norwegian Animal Welfare Act](#). A [letter to Scottish Salmon Watch from the Deputy Director General of the Norwegian Government's Ministry of Trade, Industry & Fisheries dated 18 June 2018](#) included:

The Animal Welfare Act and farmed salmon

Reference is made to your e-mail of 29. May 2018 where you ask whether there have been any prosecutions following violation of the Animal Welfare Act.

A fish farmer recently got a fine issued by the police by order from the public prosecutor, of five million NOK. There was infringement of provisions in the Welfare Act as well as the Food Act, Aquaculture Act and Pollution Act relating to a massive sea lice infestation causing severe injuries on the salmon. The incident was reported to the police by the Norwegian Food Safety Authority as well as by NGOs.

It should also be pointed out that The Food Safety Authority has the competence to issue decisions necessary to ensure compliance with the Welfare Act or regulations under this Act. They have among other things issued violation charges up to 1,4 million NOK.

The Norwegian newspaper Adressavisen reported on 5 million NOK (£465,000) case earlier this month via: "[Måsøval mistet kontroll på lakselusa: Får bot på fem millioner kroner](#)"

Adressavisen NYHETER SPORT KULTUR MENINGER UKEADRESSA LOGG INN MENY

Måsøval mistet kontroll på lakselusa:

Får bot på fem millioner kroner

Slik så fisken ut etter luseangrep. Nå ilegges Måsøval Fiskeoppdrett AS en bot på fem millioner kroner.



Slik så fisken ut etter luseangrepene i 2016. Bildet er fra fisk i ut av Lerøy Miljø anlegg, tatt sommeren 2016.

GRETE HOLSTAD
991 08 762

© Publisert: 06.06.2018 12:37

Read more on the Norwegian case via:

[Mattilsynet anmelder to oppdrettsselskap for brudd på dyrevelferdsloven](#)
[Ilegger Måsøval fiskeoppdrett bot på 5 millioner kroner](#)



Måsøval har fått utsett frist til å vedta bot på 5 millioner kroner

Selskapet vil ha meir tid til å vurdere førelegget etter lusesaka i 2016, og har fått det. 6. juni vart Måsøval Fiskeoppdrett pålagt eit førelegg på 5 millionar kroner etter at det vart avdekka store mengder lakselus



Scottish Salmon Watch's FOI request for photographic evidence was prompted by damning evidence gathered by Alexandra Morton and the Sea Shepherd Society in British Columbia, Canada. Photos and video footage of shocking welfare abuses on salmon farms are available via [Hard Evidence](#) and [Operation Virus Hunter: A Look in Salmon Farms](#).



Many fish in this farm are blind and emaciated.



Read more via:

[The first scientific evidence that farm salmon are infecting large numbers of wild salmon](#)
[Fish Farms a Viral Hotspot for Infection of B.C.'s Wild Salmon, New Study Finds](#)
[New video appears to show disfigured, unhealthy farmed salmon](#)
[Disturbing New Footage Shows Diseased, Deformed Salmon in B.C. Fish Farms](#)
[New Norwegian virus in supermarket farm salmon](#)

"Salmon farms are torturing fish all around the world," concluded Staniford. "Cheap farmed salmon comes at a huge cost to fish welfare as well as environmental costs. Consumers really must take into account the shocking abuses on salmon farms when making purchasing decisions. Anyone with a morsel of morals seeing such gruesome images would surely boycott Scottish salmon. Cheap and nasty Scottish salmon leaves a bad taste in the mouth."



[Photo: Farmed salmon from The Scottish Salmon Company's Vuiabeag salmon farm in West Loch Roag on the Isle of Lewis \(2017-0467\)](#)



[Photo: Farmed salmon from Scottish Sea Farms - Kishorn A \(South\) in Loch Kishorn \(2017-0496\)](#)

Scottish Salmon Watch has filed a further FOI request for more photographs of Scottish farmed salmon and urged the Scottish Government to routinely publish photographs alongside [Fisheries Health Inspectorate 'Case Information'](#).

Contact:

Don Staniford: 07771 541826 (dstaniford@gaaia.org)



Notes to Editors:

[1] A dossier is available online via [Hard Evidence - Photos of Diseased & Deformed Scottish Salmon \(June 2018\)](#).

Photos [disclosed by the Scottish Government via FOI \(FOI-18-01141\)](#) on 15 June 2018 - [made available by the Scottish Government online via Dropbox](#)

Fol-18-01141

Sorted by name



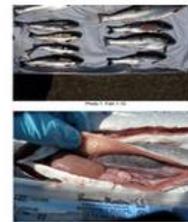
2015-0336-photos.pdf



2015-0373-photos.pdf



2016-0141-photos.pdf



2016-0187-photos.pdf



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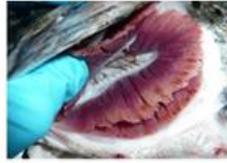
2017-0444-photos.pdf



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2017-0546-photos.pdf



2017-0550-photos.pdf



2017-0563-photos.pdf



2018-0078-photos.pdf



2018-0111-photos.pdf



2018-0112-photos.pdf



2018-0113-photos.pdf

Note the photos can be cross-referenced with the [Fish Health Inspectorate's 'Case Information'](#) which provides more context:

Scottish Government
Riaghaltas na h-Alba
gov.scot

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▼ Marine and Fisheries
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Publication of Case Information

Information relating to the inspection and operational activities of Marine Scotland's Fish Health Inspectorate is published on a regular basis. For each yearly quarter the following information is published:

- A list of all cases conducted.
- A summary of case inspections and outcomes per region.
- A list of all enhanced inspections conducted under the Aquaculture and Fisheries (Scotland) Act 2007.
- Individual case information, with each case referenced in the list of all cases conducted.

In addition to quarterly publications, the following reports are published annually.

- Annual summary of case inspections and outcomes per region.
- Annual report of operations and activities.

Please note that information relating to cases which have not been completed will only be published following completion. There may be some situations where completed cases will not be published. Where this is the case this will be detailed within the list of cases conducted.

- [2013](#)
- [2014](#)
- [2015](#)
- [2016](#)
- [2017](#)

A [letter from the Scottish Government dated 15 June 2018](#) included:

Response to your request

Please find the attached web links containing photographs which have been taken as part of the Fish Health Inspectorate's statutory inspection programme. The photographs are grouped according to their case number which is a unique number identifying any one particular FHI visit.

It is essential that these images are viewed in line with the following context:

The images should be viewed in line with the case inspection notes – available at <http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/CaseInformation> which provide additional context to the population of fish stocked on site at the point of inspection, as well as the findings and observations from the inspection and sampling undertaken. The case inspection notes for cases 20180078; 20180111; 20180112; and 20180113 are complete but are still awaiting publication which will take place in July 2018.

The Fish Health Inspectorate's (FHI) mission is to support the Scottish Government's vision of a sustainable, growing and diverse aquaculture industry whilst maintaining the high health status of farmed and wild fish and shellfish stocks in Scotland by preventing the introduction and spread of listed and emerging diseases. The FHI do this by undertaking statutory inspection and sampling programmes, providing advice to stakeholders and implementing regulatory functions in accordance with the current aquaculture and aquatic animal health regulations.

The attached images have been identified as within scope of this request. The majority show fish which have been removed and euthanised for post mortem analysis and investigative testing by the FHI.

Photographs are taken as they are a useful tool in the analytical process and it is important to view these photographs in context. The photographs attached have been taken as part of the Fish Health Inspectorate's risk based surveillance programme, which involved 160 inspections relating to fish farms in 2017.

In the wild, the reproductive strategy of fish, particularly salmon, is to produce a large number of offspring with the aim that a proportion will survive to adulthood. Fish are subject to a number of pressures in the environment, particularly naturally present pathogens and other environmental parameters, with farmed fish being no exception. It can therefore be expected that some fish will experience challenges to good health. Those fish which have been removed by the FHI represent a very small proportion of the total number of fish on an aquaculture site (for example 5 fish from sites holding between 250,000 to 1.8 million fish). The images attached do not present any human health concerns and are not a representation of the entire fish population on site.

In many cases these actions have been undertaken in support of on-going investigations which were being conducted by the farm veterinarian and in-house animal health professionals.

The photographs can be accessed through the following weblink:

<https://www.dropbox.com/sh/slya8qyh11vevo9/AAANuzeWp-wPSjYvluloVPHNa?dl=0>

The photos - together with an identification of the site and the company - have also been made available online via:

- [#1 2015-0336 Marine Harvest - Ardmaddy \(Seil Sound\)](#)
- [#2 2015-0373 Marine Harvest - Ardmaddy \(Seil Sound\)](#)
- [#3 2016-0141 Marine Harvest - Ardintoul \(Loch Alsh\)](#)
- [#4 2016-0187 Marine Harvest - Gorsten \(Loch Linnhe\)](#)
- [#5 2016-0202 Marine Harvest - Torridon \(Loch Torridon\)](#)
- [#6 2016-0231 Marine Harvest - Maol Ban \(Inner Sound, Isle of Skye\)](#)
- [#7 2016-0245 Marine Harvest - Scotasay \(East Loch Tarbert, Isle of Harris\)](#)
- [#8 2016-0441 Marine Harvest - Seaforth \(Loch Seaforth, Isle of Harris\)](#)
- [#9 2016-0449 Marine Harvest - Raineach \(East Loch Tarbert, Isle of Harris\)](#)
- [#10 2016-0450 Marine Harvest - Scotasay \(East Loch Tarbert, Isle of Harris\)](#)
- [#11 2017-0028 Scottish Sea Farms - Kishorn B \(Loch Kishorn\)](#)
- [#12 2017-0064 Scottish Salmon Company - Inch Kenneth \(Loch Na Keal, Isle of Mull\)](#)
- [#13 2017-0183 Loch Duart - Badcall Bay \(Eddrachillis Bay\)](#)
- [#14 2017-0184 Grieg Seafood - Leinish \(Loch Dunvegan, Isle of Skye\)](#)
- [#15 2017-0185 Grieg Seafood - Gob na Hoe \(Loch Dunvegan, Isle of Skye\)](#)



- [#16 2017-0188 Loch Duart - Calva Bay \(Calbha Beag\) \(Eddrachillis Bay\)](#)
- [#17 2017-0398 Scottish Sea Farms - Kishorn West \(Loch Kishorn\)](#)
- [#18 2017-0431 Marine Harvest - Port Na Cro \(Shuna Sound\)](#)
- [#19 2017-0444 Marine Harvest - Sron \(Loch Alsh\)](#)
- [#20 2017-0467 Scottish Salmon Company - Vuiabeag \(West Loch Roag, Isle of Lewis\)](#)
- [#21 2017-0469 Marine Harvest - North Shore \(Loch Erisort, Isle of Lewis\)](#)
- [#22 2017-0496 Scottish Sea Farms - Kishorn A \(South\) \(Loch Kishorn\)](#)
- [#23 2017-0533 Cooke Aquaculture Stead of Aithness \(Aith Voe Shetland\)](#)
- [#24 2017-0546 Cooke Aquaculture - East of Holm Heogland \(Burkwell\) \(Uyea Sound, Shetland\)](#)
- [#25 2017-0550 Cooke Aquaculture - Winna Ness \(Uyea Sound Shetland\)](#)
- [#26 2017-0563 Scottish Salmon Company - Strone Point \(Loch Striven\)](#)
- [#27 2018-0078 Unknown - data available in July 2018](#)
- [#28 2018-0111 Marine Harvest - Groatay \(Sound of Harris\)](#)
- [#29 2018-0112 Marine Harvest - Grey Horse Channel \(Sound of Harris\)](#)
- [#30 2018-0113 Scottish Salmon Company - Meall Mhor \(Loch Fyne\)](#)

Case Summaries:

[#1 2015-0336 Marine Harvest - Ardmaddy \(Seil Sound\)](#)

Large numbers of lethargic fish with physical damage in each cage. Lice and Pancreas Disease (PD). Positive test for Salmonid Alphavirus (SAV) and *Vibrio* spp.

2015-0336



Lethargic, moribund and hanging vertical in the water column, extensive lesions across the flanks. Slight petechial haemorrhaging in the liver and a deformed heart. Some areas of epithelial hyperplasia with fusion, some sloughing and few chronic aneurysms.



Loss of epidermis, dermal oedema and loss of structure in red muscle, and widespread inflammation, mild degeneration and necrosis in white muscle. Multifocal myocytic necrosis, endocardial cell proliferation, epicarditis and infiltration.

Photos [online here](#)

Case Information online via: <http://www.gov.scot/Resource/0050/00508596.pdf>

[#2 2015-0373 Marine Harvest - Ardmaddy \(Seil Sound\)](#)

All cages had moribund and lethargic fish with rubbed sides. Sea lice and mortalities. All fish had blood spotting on the ventral surface. Suspected Caligus damage.



F1 close up of lesion

Tested positive for salmonid alphavirus (SAV) the causative agent of pancreas disease. Secondary bacterial infections in the kidney of *Vibrio* sp. and in the lesions of unidentified bacteria. Histopathological examination suggests the bacterial infection of the lesions to be *Flavobacterium* sp. and changes associated with chronic pancreas disease.



The gills appeared to be compromised in all fish. Pale gills; some necrotic gill tissue; anorexic; inflamed vent; bloody ascites and heart appeared deformed.

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0049/00493286.pdf> (p207)

[#3 2016-0141 Marine Harvest - Ardintoul \(Loch Alsh\)](#)

High numbers of lice and lesions. Physical damage to the tail and snout; visible gill damage (white patches); numerous lesions on the tail and tail very badly damaged; lesion on the flank and skin loss on the head. All fish had a lot of lice.



Fish 6 lesion

Positive test for salmonid alphavirus (pool 2), the causative agent of Pancreas Disease (PD) with evidence of heart pathology, skin lesions with bacterial infection. *Moritella viscosa* (causative agent of Winter ulcer) was identified from the lesions and gills and a *Vibrio* species was identified.



Fish 6 – lice and skin loss on head

Scattered aneurysms and basal hyperplasia; lamellae fusion in the gills; haemorrhage in skeletal muscle; adhesions in all fish and pericarditis, cell infiltration in the ventricle and some myofiber degeneratuin in the atrium (heart).

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0050/00508590.pdf> (p90)

[#4 2016-0187 Marine Harvest - Gorsten \(Loch Linnhe\)](#)

Swollen, grey and granular kidneys. Signs of Bacterial Kidney Disease. Pseudo-membrane on the spleen of fish, lesions and all fish had loose scales.



Presence of *Renibacterium salmoninarum*, the causative agent of BKD.

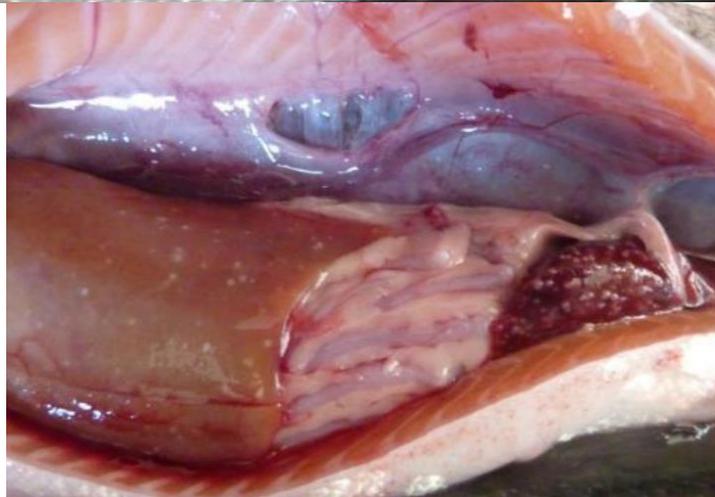


Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0050/00508591.pdf> (p32)

[#5 2016-0202 Marine Harvest - Torridon \(Loch Torridon\)](#)

Suspected BKD, granulomas across all organs in fish. Clinical signs and gross pathology associated with the presence of bacterial kidney disease.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0050/00508591.pdf> (p131)

[#6 2016-0231 Marine Harvest - Maol Ban \(Inner Sound, Isle of Skye\)](#)

Lethargic fish. Lesion on head.



Bacteriological analysis identified two separate strains of *Vibrio* spp. Histological examination showed evidence of vaccine reaction and poor doing fish.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0051/00517281.pdf> (p69)

[#7 2016-0245 Marine Harvest - Scotasay \(East Loch Tarbert, Isle of Harris\)](#)

30-40 lethargic fish with physical damage observed in cage 1, some were deeper in the water column.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00530840.pdf>

[#8 2016-0441 Marine Harvest - Seaforth \(Loch Seaforth, Isle of Harris\)](#)

Multiple gill issues including severely compromised gills with hyperplastic and hypertrophic response associated potentially with amoebic gill disease (AGD) plus post treatment effects together with hepatic necrosis and nephropathy. The fish sampled tested positive for *Neoparamoeba perurans* (the causative agent of AGD), salmon gill poxvirus (SGPV), *Paranucleospora theridon* (syn. *Desmozoon lepeophtherii*) and *Parvicapsula pseudobranchicola*.



Several gill issues including AGD, gill pox and gill parasites. Last lice count figures available for site (4/10/16) were 4.44 adult females.

All fish were unable to maintain equilibrium in the water.

Fish were crowded and those sampled were moribund and had turned over onto their backs. Sea lice damage was evident and sea lice numbers appeared high on the fish sampled. All fish sampled had damaged gills and the majority had pale gills with multiple petechial haemorrhages. White patches on gills and severe lice damage to the head.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0051/00517223.pdf> (p220)

[#9 2016-0449 Marine Harvest - Raineach \(East Loch Tarbert, Isle of Harris\)](#)

Increased mortality levels due to AGD. Severe lice damage to their heads seen in both cages observed. Removed 5 fish for diagnostic sampling, all with severe lice damage.



A mixed condition with severely compromised gills which would impact on osmotic balance and oxygen transfer. Gill lesions were also suggestive of potential post treatment effects and historic AGD. Additionally, marked hepatic necrosis and renal tubular degeneration were also seen. The *Ichthobodo* species was likely living commensally on the gill.

Positive tests for *Neoparamoeba perurans* (the causative agent of AGD), salmon gill poxvirus (SGPV) and *Paranucleospora theridion* (syn. *Desmozoon lepeophtherii*).



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0051/00517223.pdf> (p285)

[#10 2016-0450 Marine Harvest - Scotasay \(East Loch Tarbert, Isle of Harris\)](#)

Increased mortality levels due to AGD. Early harvest.



Histopathology examination revealed severely compromised gills with mixed pathology and a moderate hyperplastic response which can impact on osmotic balance and oxygen transfer. An open skin wound in Fish 2 would also impact on osmotic balance and was further compromised by a mixed bacterial infection. Bacteriology testing isolated a *Vibrio* species from the lesion.

Due to gill health issues observed on site samples were screened for *Neoparamoeba perurans* (the causative agent of AGD), salmon gill poxvirus (SGPV) and *Paranucleospora theridion* (syn. *Desmozoon lepeophtherii*). The samples tested positive for SGPV. In addition, the test for salmonid alphavirus was positive.

Photo [online here](#)

Case Information online via <http://www.gov.scot/Resource/0051/00517223.pdf> (p303)

[#11 2017-0028 Scottish Sea Farms - Kishorn B \(Loch Kishorn\)](#)

Moderate level of proliferative gill pathology with mild to moderate degenerative changes; occasional amoebic cells were noted suggesting the presence of amoebic gill disease. Additionally, myositis and skin lesions associated with bacteria were noted in two fish which may impact in the osmotic balance. A mild nephrosis was also noted.



Due to gill health issues observed on site, samples were screened by QPCR and tested positive for salmon gill poxvirus (SGPV), *Paranucleospora theridion* (syn. *Desmozoon lepeophtherii*) and *Neoparamoeba perurans* which was confirmed by histopathological examination. Bacteriology examination identified the presence of *Moritella viscosa* in all fish, with very high levels present in fish 2.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0052/00523141.pdf> (p250)

[#12 2017-0064 Scottish Salmon Company - Inch Kenneth \(Loch Na Keal, Isle of Mull\)](#)

Moribund and lethargic fish seen in all cages. Pancreas Disease. Physical damage to snout/mouth. Slightly anorexic with pale and zoned gills. Petechial haemorrhaging on the liver.



Presence of several amoebic cells suggestive of amoebic gill disease (AGD). The samples tested positive for *Neoparamoeba perurans*. Additionally, features consistent with acute pancreas disease (PD) were also seen, confirmed by the detection of Salmonid alphavirus (SAV).

Positive tests for salmon gill poxvirus (SGPV) and *Paranucleospora theridion* (syn. *Desmozoon lepeophtherii*).

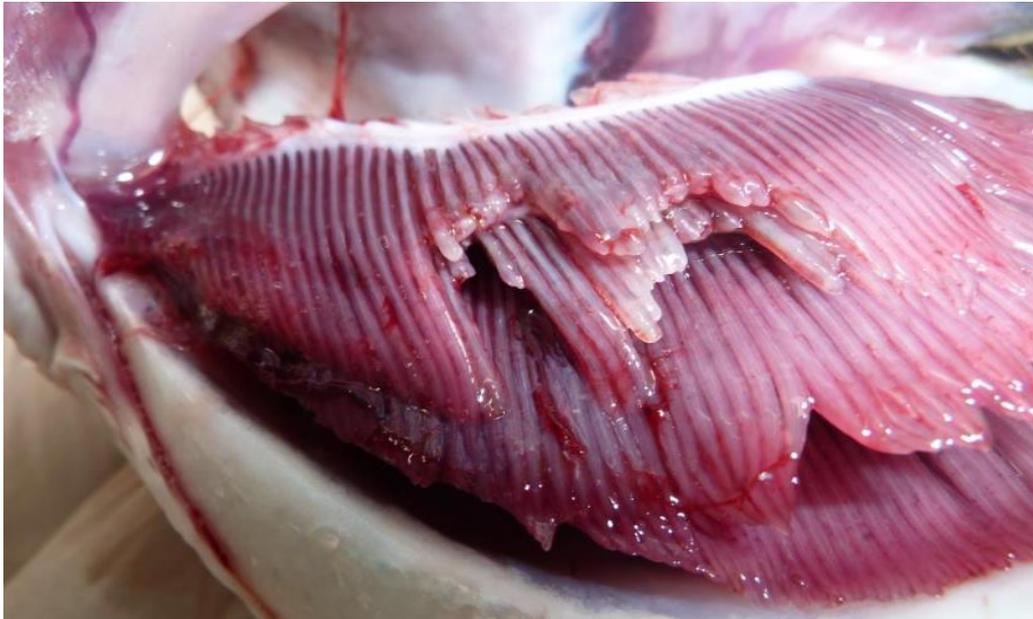


Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0052/00523142.pdf> (p121)

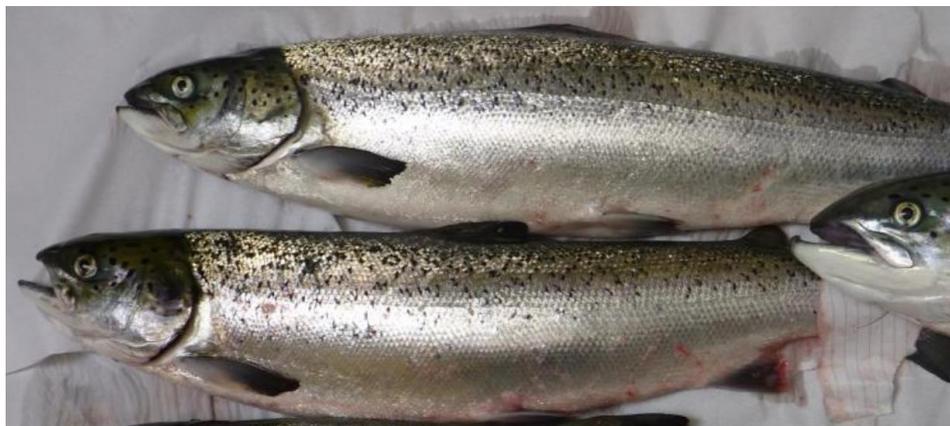
[#13 2017-0183 Loch Duart - Badcall Bay \(Eddrachillis Bay\)](#)

Severe complex gill issues with chronic and acute pathology. Amoebic cells suggestive of amoebic gill disease (AGD) were noted and confirmed. Epitheliocystis observed by histopathology was confirmed by QPCR for *Candidatus Branchiomonas cysticola* and *Candidatus Syngnamydia salmonis*. Positive for salmon gill poxvirus and *Paranucleospora theridion* (syn, *Desmozoon lepeophtherii*).



Significant gill pathology (AGD, *Branchiomonas*, *Desmazoon*, SGPV) widespread inflammation and vascular damage, AGD ct values from PCR suggested a worse infection than was seen by histology. Liver necrosis observed, *Piscirickettsia* suspected but not identified though staining.

Hearts appeared flabby and were difficult to cut. Some atriums added to pots separately. No membrane between heart and liver. Haemorrhaging at the base of the pelvic fins. A number of lethargic fish were seen across the site.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00530829.pdf> (p14)

[#14 2017-0184 Grieg Seafood - Leinish \(Loch Dunvegan, Isle of Skye\)](#)

Physical/eye damage observed. No eyes, pale liver, fluid around heart. 22719 morts/site October 2016 highest in cage 9 10074 morts/cage November 2016 8458/site complex gill issues - continuation of mort event already notified to FHI.



Histopathological examination revealed poor doing fish and mild gill pathology, which was potentially a consequence of an on-going amoebic gill disease condition. A skin lesion likely caused by predators was also noted. *Vibrio* sp. was identified, however the level and purity of growth would not suggest a current bacterial infection.

Amoebic gill disease (AGD) was reported as an on-going issue of varying severity since input of the fish. All fish were lethargic and F1-F3 were anorexic in appearance. F1 and F3 had cataracts and F4 had no eyes.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0052/00526951.pdf> (p122)

[#15 2017-0185 Grieg Seafood - Gob na Hoe \(Loch Dunvegan, Isle of Skye\)](#)

A number of lethargic fish, some with eye damage and lesions were observed across the site. Losses post Salmosan/H2O2 treatment in cage 11 (6750 morts) on 12/5/17 possibly due to CMS (Cardiomyopathy syndrome). Large lesion, skinned flanks and pale liver fluid around heart.



Histopathological examination revealed poor doing fish with mild gill pathology and skin erosion. *Vibrio* sp. was identified, however the level and purity of growth did not suggest a significant bacterial infection in this case. Cardiomyopathy syndrome was suspected at the site following increased mortality in cage 11 post treatment.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0052/00526951.pdf> (p142)

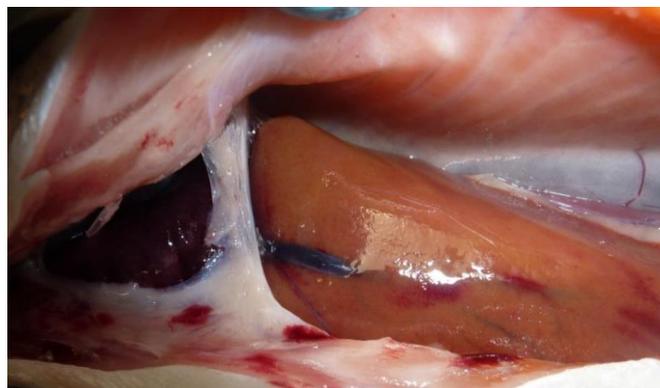
[#16 2017-0188 Loch Duart - Calva Bay \(Calbha Beag\) \(Eddrachillis Bay\)](#)

Complex gill disease and AGD, Branchiomonas infection, liver pathology. All fish had mottled livers. Haemorrhaging at the base of the pelvic fins in F1,2,3,5. All fish had swollen atrium. F1 had fluid round the heart. Results are pending for samples taken for *Piscirickettsia* PCR (did not show up on staining) and further histology including brain tissue.



Histopathology examination revealed complex gill issues with evidence of amoebic gill disease (AGD), which was confirmed by QPCR and epitheliocystis also confirmed by QPCR for *Candidatus Branchiomonas cysticola* and *Candidatus Syngnamydia salmonis*. Mild to moderate hepatic necrosis and kidney pathology. Positive tests for salmon gill poxvirus and *Paranucleospora theridion* (syn, *Desmozoon lepeophtherii*).

All fish were lethargic. Several basophilic epithelial inclusions (likely epitheliocystis), several scattered aneurysmal dilation/telangiectasia, moderate displacement of chloride cells and hypertrophy.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00530829.pdf> (p35)

[#17 2017-0398 Scottish Sea Farms - Kishorn West \(Loch Kishorn\)](#)

Low grade HSMI (Heart & Skeletal Muscle Inflammation) previously diagnosed, lamellar aneurisms (bleeding) and AGD. Possible parasitic gill organisms of uncertain identity, in relatively low numbers, associated anaemia.



All fish had very pale gills with evidence of haemorrhaging. All fish had pale livers and pale hearts. F2 and F5 had deformed hearts which were difficult to cut. F1 had fluid round the heart. Gill pathology, mainly lamellar capillary disturbances and damage. Multifocal hepatic necrosis. Positive tests for salmon gill poxvirus (SGPV), Neoparamoeba perurans (AGD) and Paranucleospora theridion.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00530831.pdf> (p130)

[#18 2017-0431 Marine Harvest - Port Na Cro \(Shuna Sound\)](#)

Gill issues, anaemia. Fish were retained for sampling from last harvest in a shallowed net so it was difficult to tell if they were really moribund or lethargic. But staff said these were the last ones remaining in the net and so anticipated they were not in good health.



F1 blood clots surrounding the heart; F3 thin, raised/lifted looking scales; haemorrhaging or lice grazing damage observed on the ventral surface of all fish to varying degrees.



Mild to moderate proliferative gill pathology with lesions consistent with amoebic gill disease (AGD), and presence of epitheliocysts. Pathology consistent with mild cardiomyopathy syndrome (CMS) was noted which was confirmed by QPCR positive result for Piscine myocarditis virus (PMCV). Positive tests for Paranucleospora theridion (syn. Desmozoon lepeophtherii) and salmon gill poxvirus (SGPV).

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534801.pdf> (p81)

[#19 2017-0444 Marine Harvest - Sron \(Loch Alsh\)](#)

Moribund and lethargic fish. Adhesions. CMS (Cardiomyopathy syndrome) - detected since January 2017, AGD and PGD (Proliferative Gill Disease).



Mild gill pathology, mainly lamellar capillary disturbances/damage. Mild multifocal hepatic necrosis (likely associated with hypoxia). Fish 3 was a poor doing individual and showed a low level of proliferative gill pathology and mild heart inflammation. A minor peritonitis likely associated with vaccine administration.



Tenacibaculum sp. was isolated by bacteriology testing as a single colony within mixed growth. The level and purity of growth would not suggest bacteria be implicated as primary pathogen.

Anorexia. Clear ascites present as well as a pale and deformed heart. Enlarged spleens. Some fibrous adhesions (likely associated with vaccine administration), lack of abdominal adipose tissue and some cell sloughing.

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534801.pdf> (p206)

[#20 2017-0467 Scottish Salmon Company - Vuiabeag \(West Loch Roag, Isle of Lewis\)](#)

Complex gill issues on site - AGD, Para Ther & Salmon gill pox. Microsporidia, SAV, epitheliocystis. Deformed spine (scoliosis). Lethargic, anorexic and areas of necrosis on the gills. Lesions on their flanks and fish one was exophthalmic. All fish had enlarged spleens.



Complex gill issues with pathology consistent with amoebic gill disease (AGD) and evidence of salmon poxvirus (both confirmed). Epitheliocystis, Candidatus Branchiomonas cysticola and Candidatus Synonymydia salmonis. Mild hepatic necrosis, likely associated with hypoxia. Skin lesion which in association with gill issues may impact on osmotic balance. Positive test for Paranucleospora theridion (syn. Desmozoon lepeophtherii).

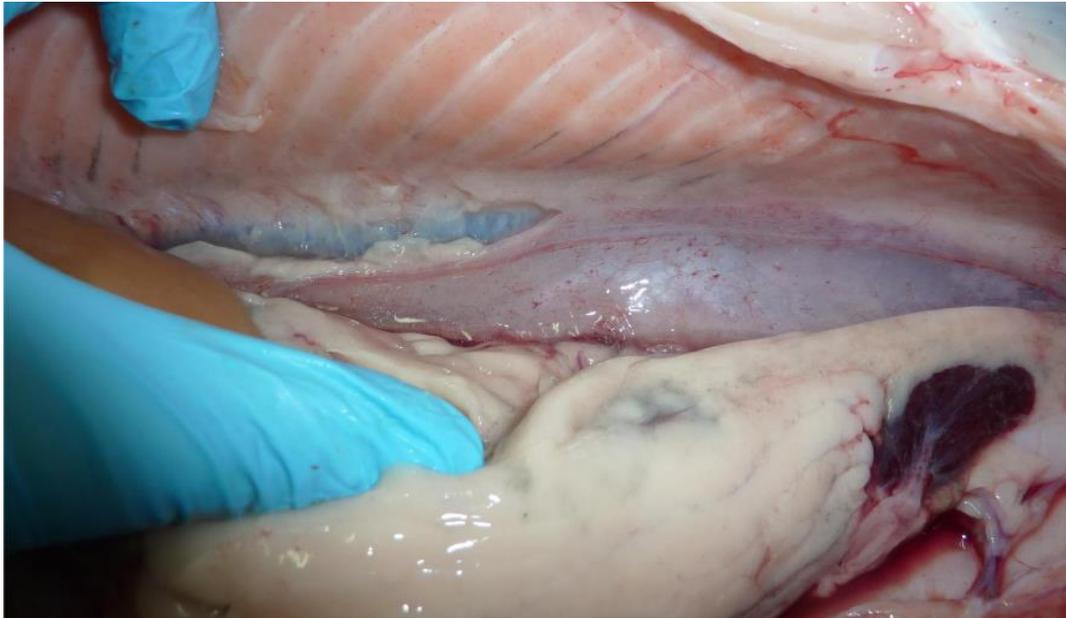


Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534802.pdf> (p26)

[#21 2017-0469 Marine Harvest - North Shore \(Loch Erisort, Isle of Lewis\)](#)

Presumptive *Pasteurella skyensis* diagnosis - based on histology results from Fish Vet Group. G. Gram -ve bacteria seen in sections and pathology consistent with previous *Pasteurella* infections. Site vet reported - fluid being seen in pericardium - from clear to 'milky white'. Fluid in peritoneal cavity - blood tinged. Also some fluid on swim bladder. Mottled spleen in some with nodules. Adhesions present.



Pasteurella skyensis was isolated, this is a known fish pathogen and the purity and growth level suggest it is likely to be implicated in morbidity. Positive tests for *Neoparamoeba perurans* (AGD), *Paranucleospora theridion* (syn. *Desmozoon lepeophtherii*) and salmon gill poxvirus. Shortened upper jaw, thickened membrane over kidney - gelatinous, adhesions. Both eyes damaged.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534802.pdf> (p56)

[#22 2017-0496 Scottish Sea Farms - Kishorn A \(South\) \(Loch Kishorn\)](#)

Tests positive for presence of AGD, Paranucleospora theridion, salmon gillpox and Branchiomonas. Lamellar bleeding of the gills. CMS was detected earlier in the cycle and HSMI like pathology in more recent tests. Advice from vets to accelerate harvests and not to attempt mechanical delousing in worst affected cages. Sea lice levels have increased. Extensive lice damage to heads. Harvesting out site, advised to avoid crowding.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534802.pdf> (p224)

[#23 2017-0533 Cooke Aquaculture Stead of Aithness \(Aith Voe Shetland\)](#)

Amoebic gill disease, epitheliocystis, salmon poxvirus, mild hepatic necrosis, hypoxia, lamellar capillary disturbances or damage and minor cardiomyopathy.

Many fish high in the water column. Many fish were moribund and about 20-30 fish over the site were observed dead on the surface of the water. All fish removed were lethargic and moribund, while fish 3 also had a cataract in one eye.



The gills of fish 3-5 were pale, and in fish 4 and 5, were necrotic. All fish had a high lice burden, between 9 and 16 (all life stages).

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534803.pdf> (p145)

[#24 2017-0546 Cooke Aquaculture - East of Holm Heogland \(Burkwell\) \(Uyea Sound, Shetland\)](#)

Variable complex gill disease including Proliferative Gill Disease (PGD) and low-level Amoebic Gill Disease (AGD). Low level Heart & Skeletal Muscle Inflammation (HSMI) type pathology, Costia, branchiomonas and mild pathology consistent with cardiomyopathy syndrome (CMS). Paranucleospora theridion (syn. Desmozoon lepeophtherii) and salmon gill poxvirus (SGPV).



Gill necrosis, shortened opercula and pale gills, enlarged spleens and anaemic. Mild pericarditis, mild multifocal myofibre necrosis, mild multifocal thickness of endocardium and leucocyte infiltration and evidences of erythrophagocytosis and empty ellipsoids.

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534803.pdf> (p287)

[#25 2017-0550 Cooke Aquaculture - Winna Ness \(Uyea Sound Shetland\)](#)

Pathology consistent with cardiomyopathy syndrome (CMS) and mild amoebic gill disease (AGD). Multifocal hepatic necrosis (likely associated with hypoxia). Paranucleospora theridion (syn. Desmozoon lepephtherii) and salmon gill poxvirus (SGPV).

Lethargic, necrosis on the gills, extensive haemorrhaging across the ventrum, throat and base of fins, an inflamed vent and areas of scale oedema and anaemic with a pale liver. Bloody ascites and a deformed heart with a large blood clot present in the pericardial cavity. Petechial haemorrhaging on pyloric caeca, liver and swim bladder.



Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534803.pdf> (p332)

[#26 2017-0563 Scottish Salmon Company - Strone Point \(Loch Striven\)](#)

Gill issues and *Vibrio anguillarum*. *Neoparamoeba perurans* (AGD), *Branchiomonas cysticola* (*Epitheliocystis*), *Paranucleospora theridion*, Salmon gill poxvirus.



Black spherical objects observed on the gills, haemorrhage/damage in the muscle tissue on the ventral surface internally, kidney unusual. The skeletal muscle necrosis noted in F3 was likely associated with a lesion.

F3 haemorrhage/damage to muscle tissue



Lethargic and moribund behaviour, as well as bilateral exophthalmia was observed in a number of fish on site. Petechial haemorrhaging observed on the livers. Enlarged spleen. Occasional degeneration of skeletal muscle noted in F1 and marked focal degeneration of skeletal muscle and haemorrhage noted in F3, an encysted parasite in the dermal layer of F2. Some fibrous adhesions (likely associated with vaccine administration).

Photos [online here](#)

Case Information online via <http://www.gov.scot/Resource/0053/00534804.pdf> (p76)

[#27 2018-0078 Unknown - data available in July 2018](#)



F1-3. F3 had anterior ventral lesion through which the heart was exposed.

Photos [online here](#)

Case Information [published in July 2018](#).

[#28 2018-0111 Marine Harvest - Groatay \(Sound of Harris\)](#)



Photos [online here](#)

Case Information [published in July 2018](#).

[#29 2018-0112 Marine Harvest - Grey Horse Channel \(Sound of Harris\)](#)

Grey Horse Channel 2018-0112



Photos [online here](#)

Case Information [published in July 2018](#).

[#30 2018-0113 Scottish Salmon Company - Meall Mhor \(Loch Fyne\)](#)

2018-0113 Meall Mhor Loch Fyne

F1 external



Photos [online here](#)

Case Information [published in July 2018](#)

A more detailed dossier is also available online via:

[Hard Evidence - Photos of Diseased & Deformed Scottish Salmon \(June 2018\)](#)

[2] Download a copy of the Scottish Government's FOI reply dated 15 June 2018 - [online here](#)

marinescotland



Scottish Government
Riaghaltas na h-Alba
gov.scot

T: +44 (0)131 244 2500 F: +44 (0)1224 295511
marinescotland@gov.scot

Don Stanford
Scottish Salmon Watch and Global Alliance Against
Industrial Aquaculture

Our ref: FoI/18/01141

15 June 2018

Dear Mr Stanford

Thank you for your request dated 1 May 2018 under the Environmental Information (Scotland) Regulations 2004 (the EIRs).

Your request

You requested photographs of diseased farmed salmon relating to all FHI visits since 1 January 2017, and in addition all FHI visits to Marine Harvest sites since 1 January 2015.

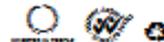
As the information you have requested is 'environmental information' for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are applying the exemption at section 39(2) of the Freedom of Information (Scotland)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

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

Response to your request

Please find the attached web links containing photographs which have been taken as part of the Fish Health Inspectorate's statutory inspection programme. The photographs are grouped according to their case number which is a unique number identifying any one particular FHI visit.

Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 9DB
www.gov.scot/marinescotland



It is essential that these images are viewed in line with the following context:

The images should be viewed in line with the case inspection notes – available at <http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/Caseinformation> which provide additional context to the population of fish stocked on site at the point of inspection, as well as the findings and observations from the inspection and sampling undertaken. The case inspection notes for cases 20180078; 20180111; 20180112; and 20180113 are complete but are still awaiting publication which will take place in July 2018.

The Fish Health Inspectorate's (FHI) mission is to support the Scottish Government's vision of a sustainable, growing and diverse aquaculture industry whilst maintaining the high health status of farmed and wild fish and shellfish stocks in Scotland by preventing the introduction and spread of listed and emerging diseases. The FHI do this by undertaking statutory inspection and sampling programmes, providing advice to stakeholders and implementing regulatory functions in accordance with the current aquaculture and aquatic animal health regulations.

The attached images have been identified as within scope of this request. The majority show fish which have been removed and euthanised for post mortem analysis and investigative testing by the FHI.

Photographs are taken as they are a useful tool in the analytical process and it is important to view these photographs in context. The photographs attached have been taken as part of the Fish Health Inspectorate's risk based surveillance programme, which involved 160 inspections relating to fish farms in 2017.

In the wild, the reproductive strategy of fish, particularly salmon, is to produce a large number of offspring with the aim that a proportion will survive to adulthood. Fish are subject to a number of pressures in the environment, particularly naturally present pathogens and other environmental parameters, with farmed fish being no exception. It can therefore be expected that some fish will experience challenges to good health. Those fish which have been removed by the FHI represent a very small proportion of the total number of fish on an aquaculture site (for example 5 fish from sites holding between 250,000 to 1.8 million fish). The images attached do not present any human health concerns and are not a representation of the entire fish population on site.

In many cases these actions have been undertaken in support of on-going investigations which were being conducted by the farm veterinarian and in-house animal health professionals.

The photographs can be accessed through the following weblink:

<https://www.dropbox.com/sh/sjya8qyh11vevo9/AAANuzeWp-wPSjYvIulcVPHNa?dl=0>

Your right to request a review

If you are unhappy with this response to your EIRs request, you may ask us to carry out an internal review of the response, by writing to:

Graham Black
Director Marine Scotland
Scottish Government
Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 9QB
www.gov.scot/marinescotland



Area 1B South
Victoria Quay
Edinburgh
EH6 6QQ

Email: directormarinescotland@gov.scot

Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at: <http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>

Yours sincerely

Neil Purvis

The Scottish Government's FOI disclosure on 15 June 2018 stemmed from a FOI request from Scottish Salmon Watch dated 1 March 2018 - which was initially [refused on 15 March 2018 by the Scottish Government](#) prompting a request by Scottish Salmon Watch for a formal review:

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

Sent: 01 May 2018 10:50

'We are likely to find a request for photographs of diseased farmed salmon limited by timescale or company name to be unreasonable for the reasons outlined above. However, we may be able to deal with a request for photographs associated only with FHI inspection visits if you request the same and indicate a manageable time frame as well as a specific site or company which you are interested in'.

So basically I am saying that a request for photographs associated with any given year or company is likely to be unreasonable (as per your email of 30 April), but a request for photographs where they have been associated and linked to FHI inspection visits is likely to be reasonable, depending upon of course the time period and number of cases involved.

With this in mind I suggest that your request is for photographs associated with FHI inspections / visits. I'm not convinced that you are very clear yourself what you require in terms of time frame or sites your request relates to. Can you please clarify exactly the time scale of your request and the sites (companies) your request relates to, in relation to photographs associated with FHI inspections / visits.

I hope this is helpful.

Regards,
Neil

Neil Purvis

Marine Scotland – Science

Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 3287

S/B: +44 (0)131 244 2500

Mob:+44 (0)777 5818 281

Fax: +44 (0)1224 295620

e: neil.purvis@gov.scot

w: <http://www.scotland.gov.uk/marinescotland>

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

Sent: 30 April 2018 07:08

To: Purvis N (Neil) (MARLAB)

Cc: McGregor H (Helen) (MARLAB)

Subject: RE: FoI/18/01141 - photos of diseased farmed salmon - acknowledgement and clarification

Thanks - is it reasonable to limit the timescale to 2016 and 2017?

Or to Marine Harvest since 2011?

Best fishes,

Don

Don Staniford

Further to my email of 20th March I have now completed my review of our response to your request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for:
Please provide copies of photos of diseased farmed salmon held on file by the Scottish Government.

Please include photos taken of salmon on farms in Scotland during site visits and Fish Health Inspections.

Please include photos taken during post mortems and via laboratory tests and monitoring.

For the definition of "diseased" please include sea lice, infections, infestations, viruses, bacteria and other disease agents.

Photographs may be held centrally via the library or via staff members such as Rob Raynard and Sandy Murray and may have been collated via research documents, presentations, reports and briefings.

Please make available as Jpegs or PDFs via a Zip file (where possible include information such as the date, location, farm, company and disease).

I have now completed my review and, in accordance with regulation 16(3)(b) of the EIRs, have reached a new decision on your request.

While our aim is to provide information whenever possible, under the exception at regulation 10(4)(b) of the EIRs a public authority may refuse a request for information if it is 'manifestly unreasonable'. The Commissioner's guidance on vexatious requests under FOISA at:

http://www.itspublicknowledge.info/Law/FOISA-EIRsGuidance/Section14/Vexatious_or_repeated_requests.aspx says that "The following factors will be relevant to a finding that a request (which may be the latest in a series of requests or other related correspondence) is vexatious:

- (i) it would impose a significant burden on the public authority;
- (ii) it does not have a serious purpose or value;
- (iii) it is designed to cause disruption or annoyance to the public authority;
- (iv) it has the effect of harassing the public authority;
- (v) it would otherwise, in the opinion of a reasonable person, be considered to be manifestly unreasonable or disproportionate."

In this case, a vast amount of information (many thousands of images) has been identified as potentially being within scope of the request. This information requires further careful consideration to identify the specific information relevant to your request. The technical nature of the information requested also means that consideration will be required by specialist staff with the relevant knowledge and experience to understand the complexities of whether the information falls under the remit of the request or not.

Having identified the specific information relevant to your request we would then have to establish if any exceptions under the EIRs apply to any of the information and redact this information as appropriate.

The time taken to gather the initial range of information, which is potentially within the scope of your request has already been extensive. Even given the 20 day extension allowable under the EIRs, it would not be possible to complete the substantial volume of work still required to identify the specific information relevant to your request and redact any information to which exceptions apply.

This work can only be carried out by individuals with the relevant skills and experience to understand the technical nature of the information involved and the implications of disclosure. This means it would not be possible to minimise costs or reduce the time required by allowing administration staff to carry out all or part of this function.

For these reasons, I also consider that your request in its current form is manifestly unreasonable and so am refusing it under regulation 10(4)(b).

As the exception is conditional we have applied the 'public interest test'. This means we have, in all the circumstances of this case, considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. While we recognise that there may be some public interest in information about copies of photos of diseased farmed salmon held on file by the Scottish Government this is outweighed by the public interest in ensuring the efficient and effective use of public resources by not complying with information requests which are manifestly unreasonable.

You may however wish to consider reducing the scope of this request in order to make it manageable. In our original response we provided a link to Fish Health Inspectorate publications. So you could consider if there are any cases in which you are particularly interested in. Also as you have not specified a time frame you could consider specifying a period of time for which you are interested in. You may also find it helpful to look at the Scottish Information Commissioner's 'Tips for requesting information under FOI and the EIRs' on his website at:

<http://www.itspublicknowledge.info/YourRights/Tipsforrequesters.aspx>

If you are unhappy with the outcome of this review you have the right to appeal to the Scottish Information Commissioner about our decision within 6 months of receiving this letter. Information on how to make an appeal, along with an application form, is available on the Commissioner's website at:

<http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>. You can also contact the Commissioner at:

The Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS

E-mail: enquiries@itspublicknowledge.info

Telephone: 01334 464610

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

Yours sincerely,
Matt Gubbins

From: Gubbins M (Matthew) (MARLAB)

Sent: 20 March 2018 16:49

To: salmonfarmingkills@gmail.com

Subject: FW: Appeal re. FoI/18/00662 - photos of diseased farmed salmon

Importance: High

Dear Mr Staniford,

Thank you for your request of 15th March for a review of our response to your request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for photographs of diseased salmon.

I have been asked by the Director of Marine Scotland, Graham Black to carry out the review because I was not involved in handling your original request. I will be looking at the case afresh to establish whether the original response should be confirmed, with or without modifications as appropriate, or a fresh decision should be substituted.

We received your review request on 15th March so I will respond in accordance with the EIRs by 13th April.

If you have any queries, please contact me quoting case number 18/00662.

Kind regards,
Matt Gubbins

Dr Matt Gubbins
Planning and Environmental Advice Programme Manager
[marinescotland](http://marinescotland.science) Science
Marine Laboratory
375 Victoria Road
Aberdeen
AB11 9DB
(44) 1312443746 (tel)
(44) 7768820376 (blackberry)

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

Sent: 15 March 2018 19:02

To: Director of Marine Scotland Mailbox

Cc: McGregor H (Helen) (MARLAB); Purvis N (Neil) (MARLAB)

Subject: Appeal re. FoI/18/00662 - photos of diseased farmed salmon

Please consider this a formal appeal of FOI 18 00662.

Please find GAAIA's FOI request of 1 March 2018 enclosed below and [the Scottish Government's reply of earlier today attached](#) - including:

Response to your request

Photographs of diseased farmed salmon are widely available in the public domain. A simple internet search reveals many tens of pictures detailing the diseases specified within your

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Aberdeen AB11 9DB
www.gov.scot/marinescotland



request. Published images associated with existing Marine Scotland web pages and supporting material (e.g. topic sheets) are also available.

Further to this, the Fish Health Inspectorate (FHI) publishes case information which includes detailed descriptions of the clinical, post-mortem and pathological observations associated with relevant inspections. As you are aware, publication of FHI case information is undertaken through our active publication plan, the details and contents of which are available on the Scottish Government website:

<http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/CaseInformation>

For the reasons detailed above, I am refusing this request under regulation 6(1)(b) of the EIRs. Regulation 6(1)(b) stipulates that we do not have to give you information that is already publicly available and easily accessible to you in another form or format.

Suffice to say that the Scottish Government's reply is woefully unacceptable. To dismiss the FOI request as saying photographs exist on the internet is a joke.

GAAIA's FOI request asked for specific photographs and images taken and held by the Scottish Government. Please reconsider the refusal of disclosure of photos.

The Scottish Government's reply directs GAAIA to FHI Case Information:
<http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/CaseInformation>

However, as the Scottish Government know perfectly well there do not appear to be any photographs in the FHI Case Information.

Instead there is information which suggests that photographs and histological pictures were taken:

For example in the latest Case Information available for July to September 2017:
<http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/CaseInformation/caseinfo2017/julsep>

Via <http://www.gov.scot/Resource/0053/00530829.pdf>

p43

FHI 059, Version 10

Issued by: FHI

Date of issue: 12/02/2016

Additional comments:

All fish had mottled livers. Haemorrhaging at the base of the pelvic fins in F1,2,3,5. All fish had swollen atrium. F1 had fluid round the heart

p218

FHI 059, Version 10

Issued by: FHI

Date of issue: 12/02/2016

Additional Case Information:

Mortality event report post grading. Site manager suspects stress at grading trigger event. No issues with one batch of fish that hadn't been graded. As part of Stirling University, samples were taken by the Institute of Aquaculture with results expected by end of week.

Suspect bacterial infection - bacteriology and histology samples taken. A prophylactic antibiotic treatment is being conducted. Update - Report on 28/07/17 - confirmed as furunculosis and fish were responding well to treatment

Please therefore reconsider the Scottish Government's refusal to disclose the information requested on 1 March 2018; namely:

Please provide copies of photos of diseased farmed salmon held on file by the Scottish Government.

Please include photos taken of salmon on farms in Scotland during site visits and Fish Health Inspections.

Please include photos taken during post mortems and via laboratory tests and monitoring.

For the definition of "diseased" please include sea lice, infections, infestations, viruses, bacteria and other disease agents.

Photographs may be held centrally via the library or via staff members such as Rob Raynard and Sandy Murray and may have been collated via research documents, presentations, reports and briefings.

Please make available as Jpegs or PDFs via a Zip file (where possible include information such as the date, location, farm, company and disease).

GAAIA would be only too happy to take the case further to the Scottish Information Commissioner.

Please acknowledge receipt of this appeal request.

Don Stanford by email
Global Alliance Against Industrial Aquaculture

Our ref: FoI/18/00662

15 March 2018

Dear Mr Stanford

Thank you for your request dated 1 March 2018 under the Environmental Information (Scotland) Regulations 2004 (the EIRs).

Your request

You asked for copies of photos of diseased farmed salmon held on file by the Scottish Government, to include photos taken of salmon on farms in Scotland during site visits and Fish Health Inspections, during post mortems and via laboratory tests and monitoring. The definition of "diseased" should include sea louse, infections, infestations, viruses, bacteria and other disease agents.

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

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

Response to your request

Photographs of diseased farmed salmon are widely available in the public domain. A simple internet search reveals many tens of pictures detailing the diseases specified within your

Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 5DB
www.gov.scot/marinescotland



request. Published images associated with existing Marine Scotland web pages and supporting material (e.g. topic sheets) are also available.

Further to this, the Fish Health Inspectorate (FHI) publishes case information which includes detailed descriptions of the clinical, post-mortem and pathological observations associated with relevant inspections. As you are aware, publication of FHI case information is undertaken through our active publication plan, the details and contents of which are available on the Scottish Government website:

<http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/CaseInformation>

For the reasons detailed above, I am refusing this request under regulation 6(1)(b) of the EIRs. Regulation 6(1)(b) stipulates that we do not have to give you information that is already publicly available and easily accessible to you in another form or format.

I also note that within your request you stipulated that 'the link via AGD does not work'. Thank you for highlighting this. The link has been repaired and should now be working.

Your right to request a review

If you are unhappy with this response to your EIRs request, you may ask us to carry out an internal review of the response, by writing to

Graham Black
Director Marine Scotland
Scottish Government
Area 1B South
Victoria Quay
Edinburgh
EH6 6QQ

Email: directormarinescotland@gov.scot

Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at: <http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>.

Yours sincerely,



Neil Purvis

Marine Laboratory, 375 Victoria Road,
Aberdeen AB11 9DB
www.gov.scot/marinescotland



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

Sent: 01 March 2018 13:51

To: Central Enquiry Unit

Cc: Purvis N (Neil) (MARLAB); McGregor H (Helen) (MARLAB)

Subject: FOI re. photos of diseased farmed salmon

Please provide copies of photos of diseased farmed salmon held on file by the Scottish Government.

Please include photos taken of salmon on farms in Scotland during site visits and Fish Health Inspections.

Please include photos taken during post mortems and via laboratory tests and monitoring.

For the definition of "diseased" please include sea lice, infections, infestations, viruses, bacteria and other disease agents.

Photographs may be held centrally via the library or via staff members such as Rob Raynard and Sandy Murray and may have been collated via research documents, presentations, reports and briefings.

Please make available as Jpegs or PDFs via a Zip file (where possible include information such as the date, location, farm, company and disease).

As context, the Scottish Government have some photographic information online via:
<http://www.gov.scot/Topics/marine/Fish-Shellfish/aquaculture/diseases>

Diseases of wild and farmed Finfish

- [Amoebic Gill Disease \(AGD\)](#)
- [Bacterial Kidney Disease \(BKD\)](#)
- [Cardiomyopathy Syndrome](#)
- [Cataracts](#)
- [Diplostomum spathaceum](#)
- [Enteric Redmouth \(ERM\)](#)
- [Epitheliocystis](#)
- [Furunculosis](#)
- [Gyrodactylus salaris](#)
- [Infectious Haematopoietic Necrosis \(IHN\)](#)
- [Infectious Salmon Anaemia \(ISA\)](#)
- [Infectious Pancreatic Necrosis \(IPN\)](#)
- [Pancreas Disease \(PD\)](#)
- [Proliferative Kidney Disease \(PKD\)](#)
- [Red Mark Syndrome \(RMS\)](#)
- [Red Vent Syndrome \(RVS\)](#)
- [Saprolegnia](#)
- [Sarcocystis](#)
- [Sea Lice](#)
- [Spring Viraemia of Carp \(SVC\)](#)
- [Viral Haemorrhagic Septicaemia \(VHS\)](#)

By the way the link via AGD does not work:

<http://sh45inta/Topics/marine/science/Publications/TopicSheets/AmoebicGillDiseaseTS>

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

Please provide this information electronically via email as a Zip file (or make available online via Dropbox or another downloading option for large files).

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Best wishes,

Don