

Scottish Salmon Watch, 11 November 2019

[FOI Victory: Scottish Ministers Forced to Come Clean on 'Scottish' Salmon Imports](#)

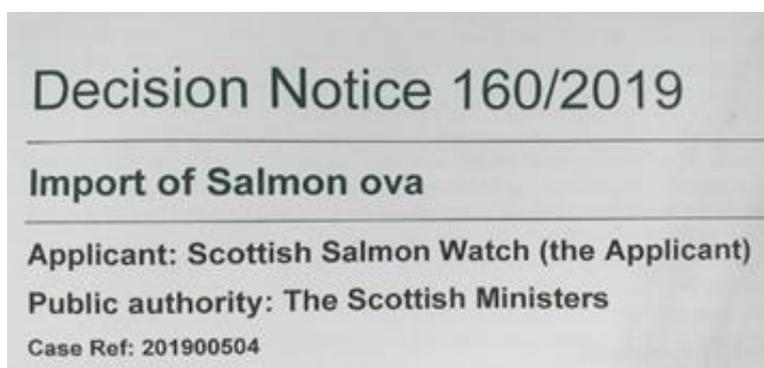


# FREEDOM FOR FISH

- **Scottish Ministers argued (unsuccessfully) that disclosure of data on ova imports by Scottish Sea Farms "would cause substantial harm to commercial interests" & "would prejudice substantially the confidentiality of commercial information"**
- **Scottish Ministers "failed to comply" & "wrongly withheld" information**
- **Ruling by Scottish Information Commissioner Orders Disclosure by 17 December**

A [landmark ruling by the Scottish Information Commissioner](#) has exposed how Scottish Ministers unfairly protected [Norwegian-owned Scottish Sea Farms](#) from public scrutiny. In a [Decision Notice \(160/2019\) published online last week](#), Scottish Ministers are required to provide Scottish Salmon Watch with information on imports of salmon ova (eggs) by 17 December 2019.

"In all the circumstances, the Commissioner cannot accept that disclosure of the withheld information in this case would have the effect suggested by the Ministers i.e. that disclosure would, or would be likely to, prejudice substantially the confidentiality of commercial or industrial information where such confidentiality is provided for by law to protect a legitimate economic interest," [stated the Scottish Information Commissioner Decision Notice 160/2019](#) (another version with Scottish Salmon Watch named as the Applicant is [available online here](#)).



Read Exclusively in today's National via "[Watchdog demands release of government facts about Scottish Salmon](#)"

## Summary

The Ministers were asked about salmon ova imports since 1 January 2017. The Ministers provided the majority of the information to the Applicant, but withheld some information as commercially confidential. The Commissioner investigated and did not accept that the information was commercially confidential. He required the Ministers to disclose the withheld information to the Applicant. He also found that information disclosed during the investigation had been wrongly withheld earlier.

## Decision

The Commissioner finds that the Scottish Ministers (the Ministers) failed to comply fully with the Environmental Information (Scotland) Regulations 2004 (the EIRs) (and in particular with regulation 5(1)) in responding to the information request made by the Applicant.

The Commissioner does not accept that the information still withheld is excepted from disclosure under regulation 10(5)(e) of the EIRs. The Commissioner therefore requires the Ministers to provide the Applicant with the information, by 17 December 2019.

The Commissioner also finds that the Ministers had no justification for withholding the information disclosed to the applicant during the investigation.

"This landmark ruling and victory for Freedom of Information is a slap in the face for Scottish Ministers with a disease-ridden farmed fish," said Don Staniford, Director of [Scottish Salmon Watch](#). "The Scottish Government has been caught protecting the [foreign-owned salmon farming industry](#) from public scrutiny rather than protecting Scotland's marine environment and iconic wild salmon. Instead of flooding Scotland with fake 'Scottish' salmon imported as eggs from Norway and Iceland the Government should be protecting the genetic integrity of the King of Fish."



"Scottish Salmon Watch calls on Scottish Ministers to immediately ban imports of salmon ova as is already the case in Norway. It beggars belief that the Scottish Government value the confidentiality and commercial interests of a Norwegian-owned company way ahead of environmental protection. Shame on Scottish Ministers for promoting the scam, sham and consumer con that is '[Scottish Scamon](#)'. A big thanks to the Scottish Information Commissioner for forcing rogue Scottish Ministers to comply with the law and ensure that the naked truth about this disease-ridden industry is exposed for the whole world to see."

Significantly, the [Scottish Information Commissioner's Decision Notice 160/2019](#) addressed the issue of "confidentiality of commercial or industrial information" (ultimately ruling in favour of Scottish Salmon Watch and against Scottish Ministers):

### **Regulation 10(5)(e) - Confidentiality of commercial or industrial information**

22. Regulation 10(5)(e) of the EIRs provides that a Scottish public authority may refuse to make environmental information available to the extent that its disclosure would, or would be likely to, prejudice substantially the confidentiality of commercial or industrial information, where such confidentiality is provided for by law to protect a legitimate economic interest.
23. A Scottish public authority applying an exception must interpret it in a restrictive way and apply a presumption in favour of disclosure (regulation 10(2)). Even where the exception applies, the information must be disclosed unless, in all the circumstances, the public interest in making the information available is outweighed by that in maintaining the exception (regulation 10(1)(b)).
24. *The Aarhus Convention: an Implementation Guide*<sup>1</sup>, which offers guidance on the interpretation of the convention from which the EIRs are derived, notes (at page 88) that the first test for considering the exception in regulation 10(5)(e) is whether national law expressly protects the confidentiality of the withheld information. The law must explicitly protect the type of information in question as commercial or industrial secrets. Secondly, the confidentiality must protect a "legitimate economic interest": this term is not defined in the Convention, but its meaning is considered further below.

### *Submissions from the Ministers*

25. The Ministers submitted that there was "a clear commercial nature to this information as it contains details of third party operators and source companies that have imported salmon ova into Scotland." The Ministers explained that SSF had entered into a mutual confidentiality agreement with Aqua Gen AS, and Landcatch Natural Selection Limited, which showed that the information (which was covered by the agreement) was commercially confidential in nature.
26. The Ministers' submission explained that, when dealing with the initial request, they contacted all companies that had imported ova into Scotland since 1 January 2017, asking for their views on whether the information the Ministers held relating to them should be disclosed. In response, SSF provided their reasons for not disclosing specific information, which they considered was excepted under regulation 10(5)(e). In support of this, SSF provided extracts of relevant confidentiality clauses within contractual agreements.
27. The Ministers said that to disclose this information would breach the terms of the confidentiality agreement in place, and would cause substantial harm to the interests of SSF. If the information were released, it would disclose company or commercial strategy in the production of salmon in freshwater, which would substantially prejudice future production strategies.
28. The Ministers acknowledged that similar information relating to other companies had been released, but commented that but these other companies did not object to disclosure of that information in reliance on a confidentiality agreement.

### *Submissions from the Applicant*

29. In its application to the Commissioner, the Applicant disagreed that "disclosure ... would, or would be likely to, prejudice substantially the confidentiality of commercial information provided by SSF and thus cause substantial harm to their commercial interests". The Applicant said that-

"... no other salmon farming company have objected to the disclosure of the same information and it is difficult to argue that SSF has a unique reason which demands non-disclosure. Why should SSF be afforded exclusivity in terms of privacy and anonymity?"

The [Scottish Information Commissioner's view](#) included:

40. The Commissioner does not accept that he has been given sufficient evidence or reasoning to explain or show that disclosure of the specific withheld information would, or would be likely to, cause substantial harm to legitimate economic interests in the respects asserted by the Ministers.
41. First, it is not obvious that the information would be commercially sensitive, or that disclosure would, or be likely to, cause substantial harm to a legitimate economic interest. The information does relate to a commercial relationship, but the Ministers' submission does not explain the commercial sensitivity of the material or the anticipated harm. The Commissioner has not received any explanation of how this information relates so intimately to the areas of commercial strategy alluded to (in quite general terms), or how (or to what extent) that strategy – or any future strategy – would be harmed by disclosure. He has not received any explanation that links disclosure of the information with harm, other than there would be disclosure of commercial strategy.
42. Similar information, for other commercial entities, has been disclosed to the Applicant in this case, and released into the public domain in past disclosures<sup>2</sup> (also under the EIRs). The Commissioner is not aware of any harm resulting from such disclosures. He has not received any argument or evidence that a past disclosure has resulted in substantial harm to any legitimate economic interest. While disclosure of similar information is not in itself sufficient to conclude that disclosure of the present withheld information would not have the effect that the Ministers contend, in the absence of explanation of a difference between the withheld information and similarly disclosed information the Commissioner must attribute some weight to the case for discounting the required harm.
43. In all the circumstances, the Commissioner cannot accept that disclosure of the withheld information in this case would have the effect suggested by the Ministers i.e. that disclosure would, or would be likely to, prejudice substantially the confidentiality of commercial or industrial information where such confidentiality is provided for by law to protect a legitimate economic interest. The Commissioner therefore is not satisfied that the exception in regulation 10(5)(e) of the EIRs could legitimately be applied to the remaining withheld information.

## **Enforcement**

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If the Ministers fail to comply with this decision, the Commissioner has the right to certify to the Court of Session that the Ministers have failed to comply. The Court has the right to inquire into the matter and may deal with the Ministers as if it had committed a contempt of court.

The [FOI reply from Scottish Ministers dated 2 July 2018](#) (which prompted Scottish Salmon Watch's appeal to the Scottish Information Commissioner) disclosed an Excel spreadsheet which was redacted in relation to Scottish Sea Farms only:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number	Source Country	Source Company
09/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	REDACTED	REDACTED	REDACTED
23/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	REDACTED	REDACTED	REDACTED
30/11/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	REDACTED	Iceland	REDACTED
08/12/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	REDACTED	Iceland	REDACTED
07/02/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	REDACTED	REDACTED	REDACTED
01/03/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	REDACTED	REDACTED	REDACTED
18/01/2017	Knock Hatchery	Scottish Sea Farms Ltd		Salmon	Ova	REDACTED	REDACTED	REDACTED
09/02/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	REDACTED	REDACTED	REDACTED
07/11/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	REDACTED	Iceland	REDACTED
18/01/2018	Knock	Scottish Sea Farms Ltd		Salmon	Ova	REDACTED	REDACTED	REDACTED
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	REDACTED	REDACTED	REDACTED

Information on imports involving all other companies including [Marine Harvest \(re-named Mowi on 1 January 2019\)](#) and [The Scottish Salmon Company](#) was disclosed:

Date	Site of destination	Operator	Species	Stage	Number	Source Country	Source Company
25/01/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	156,000	Norway	Marine Harvest Norway
16/02/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	4,000,000	Norway	Marine Harvest Norway
29/03/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,664,900	Norway	Marine Harvest Norway
29/03/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	1,285,100	Norway	Marine Harvest Norway
13/06/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	1,506,000	Norway	Marine Harvest Norway
13/06/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,494,000	Norway	Marine Harvest Norway
16/11/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	3,600,000	Norway	Marine Harvest Norway
20/12/2017	Inchmore	Marine Harvest (Scotland) Ltd	Salmon	Ova	1,950,000	Norway	Marine Harvest Norway
20/12/2017	Inchmore	Marine Harvest (Scotland) Ltd	Salmon	Ova	1,950,000	Norway	Marine Harvest Norway
31/01/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	216,592	Norway	Marine Harvest Norway
07/02/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	1,884,000	Norway	Marine Harvest Norway
08/02/2018	Inchmore	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,300,000	Norway	Marine Harvest Norway
18/04/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	3,500,000	Norway	Marine Harvest Norway
16/05/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	3,800,000	Norway	Marine Harvest Norway
15/05/2018	Inchmore	Marine Harvest (Scotland) Ltd	Salmon	Ova	1,300,000	Norway	Marine Harvest Norway

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number	Source Country	Source Company
11/01/2017	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company	Salmon	Ova	785,250	Norway	AquaGen AS
16/02/2017	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company	Salmon	Ova	562,500	Norway	AquaGen AS
11/01/2017	Tullich Hatchery	The Scottish Salmon Company		Salmon	Ova	1,176,000	Iceland	Stofniskur
15/02/2017	Geocrab Hatchery	The Scottish Salmon Company		Salmon	Ova	876,000	Iceland	Stofniskur
01/03/2017	Geocrab Hatchery	The Scottish Salmon Company		Salmon	Ova	396,000	Norway	AquaGen AS
23/02/2017	Geocrab Hatchery	The Scottish Salmon Company		Salmon	Ova	55,000	Iceland	Stofniskur
09/11/2017	Tullich Hatchery	The Scottish Salmon Company		Salmon	Ova	2,714,250	Iceland	Stofniskur
22/11/2017	Kinlochmoidart Hatchery	The Scottish Salmon Company		Salmon	Ova	1,522,500	Iceland	Stofniskur
15/11/2017	Barvas Hatchery	The Scottish Salmon Company		Salmon	Ova	172,000	Iceland	Stofniskur
01/02/2018	Tullich Hatchery	The Scottish Salmon Company		Salmon	Ova	1,360,000	Iceland	Stofniskur
30/01/2018	Barvas Hatchery	The Scottish Salmon Company		Salmon	Ova	1,047,500	Norway	Salmobreed
30/01/2018	Amhuinnsuidhe Hatchery	The Scottish Salmon Company		Salmon	Ova	400,000	Norway	Salmobreed
01/03/2018	Kinlochmoidart Hatchery	The Scottish Salmon Company		Salmon	Ova	615,000	Iceland	Stofniskur
27/02/2018	Geocrab Hatchery	The Scottish Salmon Company		Salmon	Ova	508,000	Norway	Salmobreed

Download the data in full [online here](#)



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## Background:

In July 2019, the Mail On Sunday [reported](#) that "around 90 per cent of salmon eggs hatching in Scotland are foreign" with 66 million salmon eggs shipped in from abroad (mostly Norway).

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By **Georgia Edkins**

KNOWN as the king of fish, the Scottish salmon is prized by diners around the world.

But campaigners warn that millions of salmon sold by the country's fish farms should not be regarded as Scottish at all.

For fish farms are importing record numbers of foreign salmon eggs – mostly from Norway and Iceland – to boost stocks.

It is thought that around 90 per cent of salmon eggs hatching in Scotland are foreign.

More than 65 million foreign eggs, or ova, were shipped to Scottish fish farms last year, up from 57.9 million in 2017.

The foreign ova are hatched in Scotland and the fish reared in sea cages. Once they have been harvested and packaged, they are marketed as Scottish, despite originally hailing from abroad.

Fish farmers insist importing eggs is vital to grow the salmon industry, which they hope will double in value by 2030.

But critics claim the figures are evidence of 'food fraud' and that consumers are being duped into believing they are buying completely Scottish fish. Some also fear foreign ova could lead to the spread of devastating viral diseases.

Last night, campaigners called for an end to the 'deceptive' use of foreign salmon eggs.

Scottish Salmon Watch's Don Staniford told The Scottish Mail on Sunday: 'This is deceptive marketing and it is a salmon scandal.'

'Twenty years ago Scottish salmon came from domestic eggs but the industry are ramping up the number of eggs. Scottish salmon

# 90% of Scottish salmon 'ISN'T from Scotland'

## 66m eggs shipped in from abroad



**KING OF FISH:** Scottish salmon should now be renamed Norwegian salmon with "Made in Norway" stamped on the packaging.

'They are trading on Scotland's good image. We want the importing of eggs to stop.'

Salmon egg imports are monitored by the Scottish Government through its Marine Scotland Directorate. In the first three months of this year 27.4 million eggs were shipped into the country.

Mr Staniford said: 'Importing eggs is a public health hazard. Consumers are thinking salmon is a healthy product but it is sourced from disease-laden farms.'

In 2017, one of the biggest Norwegian fish egg exporters to Scotland

Norwegian exporter became ISA-free again.

But there is no statutory duty to sample eggs before they are introduced into Scottish waters, according to the Scottish Government.

However, Hamish Macdonell, director of strategic engagement for the Scottish Salmon Producers' Organisation, said: 'All imported eggs are subject to stringent legal controls to ensure their highly regulated biosecurity.'

'All of the eggs used by Scottish salmon farmers hatch and complete their life cycle in Scotland. Scottish provenance is defined by the environment in which the fish are grown.'

'The number of eggs imported has gone up, from 59.7 million in 2015 to 65.8 million in 2018, a rise of 10 per cent, which is in line with the industry's ambition to achieve 5 per cent year-on-year growth.'

**'Should be renamed as Norwegian'**

suffered an outbreak of infectious salmon anaemia (ISA).

This virus causes severe anaemia in fish, which can develop pale scales and abnormal swimming patterns. The import of eggs to Scotland only resumed once the

The Press & Journal reported via "[Scottish Salmon Not Scottish, Campaigners Claim](#)" (8 July 2019):

Scottish Salmon Watch's Don Staniford said: 'This is deceptive marketing and it is a salmon scandal.'

'Twenty years ago Scottish salmon came from domestic eggs but the industry are ramping up the number of eggs. Scottish salmon should now be renamed Norwegian salmon with 'Made in Norway' stamped on the packaging.'

'They are trading on Scotland's good image. We want the importing of eggs to stop.'

Read more via:

[Mail On Sunday: "90% of Scottish salmon 'ISN'T' from Scotland' - 66m eggs shipped in from abroad"](#)

[Scottish salmon not Scottish, campaigners claim](#)

[Salmon Eggsclusive: Scotland's 'King of Fish' is Now Viking Not Scottish!](#)

In May 2019, Scottish Salmon Watch [reported](#):

According to the latest [Scottish Fish Farm Production Survey](#) (published in October 2018), 90% of the ova laid down to hatch in 2017 (59.2 million out of 65.7 million) were foreign ova. Whilst the Scottish Government is flooding lochs with foreign fish, the Norwegian Government has [banned the import of salmon ova from Scotland](#) citing unacceptable disease and genetic risks under the [Norwegian Nature Diversity Act](#).

[FOI/19/00976](#) published online by the Scottish Government on 7 May 2019 reveals that 93.2 million ova have been imported by salmon farmers in Scotland since 1 January 2018 with 65.8 million imported during 2018 and 27.4 million imported in 2019 (data up to 2 April 2019). Here's the top twenty imports - with Marine Harvest Norway ([re-named Mowi on 1 January 2019](#)) responsible for the seven largest consignments:

Date consignment due	Destination site name	Destination business name	Consignee Business name (if different from destination business)	Species	Stage	Number in consignment	Source Country	Import consignor
16/05/2018	Lochalort Recirculation Hatchery	Marine Harvest (Scotland) Ltd		Salmon	Ova	3,800,000	Norway	Marine Harvest Norway
18/04/2018	Lochalort Recirculation Hatchery	Marine Harvest (Scotland) Ltd		Salmon	Ova	3,500,000	Norway	Marine Harvest Norway
04/01/2018	Inverpoll	Finfish Ltd	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,600,000	Norway	Marine Harvest Norway
15/11/2018	Lochalort Recirculation Hatchery	Marine Harvest (Scotland) Ltd		Salmon	Ova	2,500,000	Norway	Marine Harvest Norway
06/12/2018	Cairndow Hatchery	Lakeland (Cairndow) Ltd		Salmon	Ova	2,500,000	Norway	Marine Harvest Norway
08/02/2018	Inchmore	Marine Harvest (Scotland) Ltd		Salmon	Ova	2,300,000	Norway	Marine Harvest Norway
04/04/2018	Inverpoll	Finfish Ltd		Salmon	Ova	2,300,000	Norway	Marine Harvest Norway
27/11/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd		Salmon	Ova	2,197,000	Norway	AS Bolaks
08/11/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	2,150,000	<Redacted>	<Redacted>
16/01/2018	Mill Bum (Old Mill)	Kintail Hatchery	Migdale Smolts Ltd	Salmon	Ova	2,000,000	Norway	Salmobreed
16/01/2019	Mill Bum (Old Mill)	Kintail Hatchery	Migdale Smolt Ltd	Salmon	Ova	2,000,000	Norway	Grieg Seafood Rogaland
14/06/2018	Inchmore	Marine Harvest (Scotland) Ltd		Salmon	Ova	1,900,000	Norway	Marine Harvest Norway
14/06/2018	Inchmore	Marine Harvest (Scotland) Ltd		Salmon	Ova	1,900,000	Norway	Marine Harvest Norway
03/10/2018	Girista Hatchery	Grieg Seafood Shetland Ltd (Hatchery)		Salmon	Ova	1,890,000	Iceland	Stofniskur Hf.
07/02/2018	Lochalort Recirculation Hatchery	Marine Harvest (Scotland) Ltd		Salmon	Ova	1,884,000	Norway	Marine Harvest Norway
20/03/2018	Cairndow Hatchery	Lakeland (Cairndow) Ltd		Salmon	Ova	1,800,000	Norway	Marine Harvest Norway
20/02/2019	Girista Hatchery	Grieg Seafood Shetland Ltd (Hatchery)		Salmon	Ova	1,800,000	Norway	Grieg Seafood Rogaland
28/03/2019	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Scotland Ltd	Salmon	Ova	1,800,000	Iceland	Stofniskur Hf.
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	1,600,000	<Redacted>	<Redacted>
04/02/2019	Lochalort Recirculation Hatchery	Mowi Scotland Ltd		Salmon	Ova	1,563,000	Norway	MOWI Norway

Data relating to 17.6 million ova imports to [Norwegian-owned Scottish Sea Farms](#) was redacted but a [FOI reply in February 2019](#) revealed [Scottish Sea Farms imported ova from AquaGen in Norway in November 2018](#) despite fears over the deadly virus [Infectious Salmon Anaemia](#).

Date consignment due	Destination site name	Destination business name	Consignee Business name (if different from destination business)	Species	Stage	Number in consignment	Source Country	Import consignor
08/11/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	2,150,000	<Redacted>	<Redacted>
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	1,600,000	<Redacted>	<Redacted>
18/01/2018	Knock	Scottish Sea Farms Ltd		Salmon	Ova	1,550,000	<Redacted>	<Redacted>
07/02/2018	<Redacted>	<Redacted>	Scottish Sea Farms Ltd	Salmon	Ova	1,500,000	<Redacted>	<Redacted>
10/01/2019	Barcaldine Hatchery Incubation 4	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	<Redacted>	<Redacted>
10/01/2019	Barcaldine Hatchery Incubation 2	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	<Redacted>	<Redacted>
16/01/2019	Knock	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	<Redacted>	<Redacted>
21/03/2019	Barcaldine Hatchery Incubation 1	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	<Redacted>	<Redacted>
21/03/2019	Barcaldine Hatchery Incubation 3	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	<Redacted>	<Redacted>
27/11/2018	Barcaldine Hatchery Incubation 1	Scottish Sea Farms Ltd		Salmon	Ova	1,250,000	<Redacted>	<Redacted>
27/11/2018	Barcaldine Hatchery Incubation 3	Scottish Sea Farms Ltd		Salmon	Ova	1,250,000	<Redacted>	<Redacted>
01/03/2018	<Redacted>	<Redacted>	Scottish Sea Farms Ltd	Salmon	Ova	800,000	<Redacted>	<Redacted>

Download the Excel spreadsheet [online here](#)

An appeal by Scottish Salmon Watch to the Scottish Information Commissioner is currently in progress with the [Scottish Government maintaining](#) that "disclosure....would, or would be likely to, prejudice substantially the confidentiality of commercial information provided by Scottish Sea Farms and thus cause substantial harm to their commercial interests".

In February 2019, Scottish Salmon Watch [revealed](#) that AquaGen's import of 2.5 million salmon eggs to the [Scottish Sea Farms hatchery at Barcaldine](#) in November 2018 was delayed due to fears over the spread of Infectious Salmon Anaemia (ISA).



An inspection of [AquaGen's Hollywood Salmon Farm](#) in November 2018 by the Scottish Government's Fisheries Health Inspectorate [reported](#) that: "The biosecurity measures plan for the site was inspected and found to be inadequately maintained".



In a stinging attack last year, the head of the only independent Scottish salmon egg producer ([Landcatch](#) - owned by [Hendrix Genetics](#)) accused the Scottish Government of taking a "massive risk" by allowing salmon eggs from Norway and Iceland to flood 'Scottish' salmon farms citing the danger of "transfer of ISA from infected countries such as Norway".

"This means that the Scottish salmon industry is now 100% reliant on imported eggs - both a massive risk in the event of borders closing for disease issues (and also the transfer of ISA from infected countries such as Norway), but also making a complete mockery of the brand 'Scottish Salmon'," stated an [email to Fergus Ewing, Cabinet Secretary for the Rural Economy, dated 12 February 2018](#).

In February 2018, [Norway's Ministry of Climate & Environment](#) banned the import of Scottish salmon eggs citing risks of disease and genetic impacts of escapes under the Norwegian [Nature Diversity Act](#).

"Farmed salmon with partial Scottish origin increases the likelihood of a negative impact on Norwegian wild populations above negative effects with Norwegian farmed strains," [stated the 22-page letter of refusal by the Norwegian Government](#). "There is a high probability that genetic mixing between Norwegian wild salmon and farmed salmon of partly Scottish origin will increase the loss of genetic diversity."

"This speaks for the Ministry's view that concern for biodiversity and wild salmon should be given significant weight in the case," [continued Norway's Ministry of Climate & Environment](#). "The Ministry also refers to the value of Norwegian wild salmon as an ecosystem service, or a natural good."

In February 2019, Scottish Salmon Watch [revealed](#) that 99% of 'Scottish' salmon farming production was controlled by foreign interests with 65% controlled by Norwegian-owned companies ([Mowi](#), [Scottish Sea Farms](#) and [Grieg Seafood](#)). The [Swiss/Ukrainian-owned Scottish Salmon Company](#) has recently been bought out by [Faroese/Norwegian-owned Bakkafrost](#).



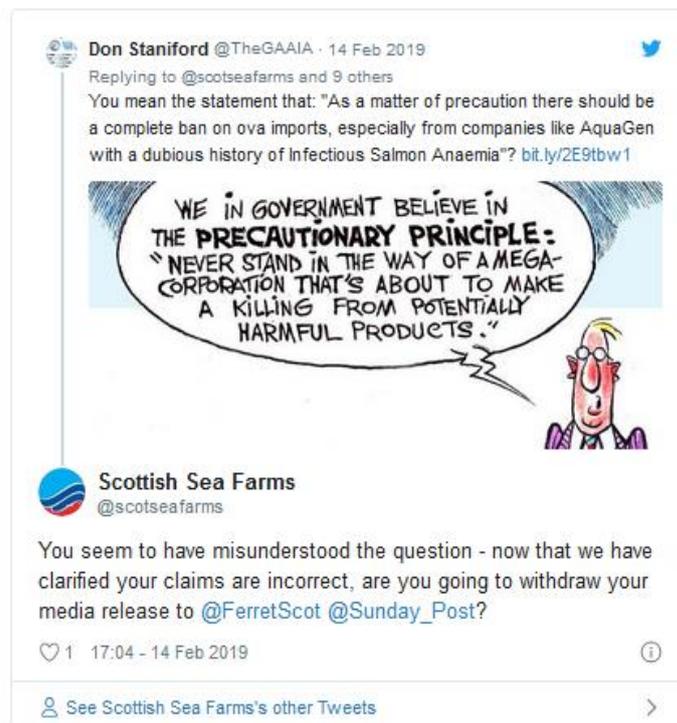
The Ferret [reported in February 2019](#):



**Government officials raised concerns over the import to Scotland of salmon eggs from a Norwegian company called AquaGen after the outbreak of a deadly virus.**

[Documents](#) obtained under freedom of information law reveal that fears were expressed by both Scottish and UK government officials over [Infectious Salmon Anaemia \(ISA\)](#), a devastating viral disease transmitted through water affecting fish.

According to Scottish Salmon Watch, the outbreak of ISA in Norway delayed a shipment of 2.5 million salmon ova from AquaGen to a firm called [Scottish Sea Farms](#) for a new hatchery in Oban. But this denied by the company, and prompted a [public argument on social media](#).



The Oban Times [reported on 13 November 2018:](#)

## The Oban Times

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### Minister visits new £48m freshwater salmon hatchery



A new £48 million state-of-the-art freshwater salmon hatchery takes delivery of its first batch of eggs next week – all the way from Norway.

The 2.5 million eggs will mark the start of operations at the Scottish Sea Farms (SSF) freshwater hatchery at Barcaldine, although the facility will not officially open until next year.

Today the site, still under construction, got a visit from Scotland's Minister for Public Finance and Digital Economy, Kate Forbes MSP.

In an email disclosed by the Scottish Government via FOI in November 2018, Scottish Sea Farms ([a subsidiary of the Norwegian company Norskott Havbruk AS - owned jointly by the Norwegian companies Leroy and SalMar](#)) raised an objection to disclosure due "to the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest":

**From:** [Redacted]@scottishseafarms.com

**Sent:** 12 June 2018 10:02

**To:** [Redacted] (MARLAB)

**Subject:** RE: Request for information under the Environmental Information (Scotland) Regulations 2004

**Importance:** High

Dear [Redacted],

Thank you for informing us of the request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Whilst we understand that this consultation is a courtesy, not a statutory obligation, we wish to raise our objection to the release of specific categories of under 12.—(5) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that its disclosure would adversely affect - (e) the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest. [Redacted]

[redacted]

Should you require clarification on any of the above please don't hesitate to contact me, and I would appreciate to be informed as to the outcome of your decision.

Best regards,

[Redacted]

[redacted]

In August 2018, it was revealed that lawyers acting for Scottish Sea Farms had [threatened legal action](#) to prevent the disclosure of [damning photos of disease-ridden Scottish salmon](#).



In May 2018, a front page article in The National newspaper [reported](#):

The image shows the front page of The National newspaper from Thursday, May 31, 2018. The masthead includes the date, the newspaper's name 'THE NATIONAL', the website 'WWW.THENATIONAL.SCOT', and the price '80p'. Below the masthead is a photograph of Lesley Riddoch, a woman with blonde hair wearing a tan jacket. The headline reads 'Lesley Riddoch Scotland doesn't have to look far for inspiration'. Below this is a large photograph of a salmon in a stream. To the right of the photograph is a large, bold headline: 'Ministers are failing to protect Scottish salmon'. Below this headline is a sub-headline: 'Exclusive: Call for import ban on eggs to safeguard native species'.

Insider [reported in March 2019](#):

insider.co.uk ECONOMY MARKETS SECTORS ▾ EVENTS ▾ SPECIAL REPORTS DEALS AND DEALMAKERS

f t in Q

## Norwegian firm buys Dumfries-shire fish hatchery to put selective breeding science into practice

AquaGen says new approach will breed stronger, healthier fish and result in better product

SHARE f t in R ✉ By Hamish Burns 00:00, 1 MAR 2019 NEWS



Andrew Reeve of AquaGen Scotland with Ralph Bickerdike of Scottish Sea Farms

Fergus Ewing, Cabinet Secretary for the Rural Economy, said: "AquaGen's investment speaks volumes of the confidence from the sector of doing business in Scotland and supports the aims of Scotland's 10-year Farmed Fish Health Framework, helping to improve the security of Scotland's ova supply."

AquaGen AS chief executive Officer Nina Santi said: "We are committed to providing our customers in Scotland with a secure supply of eggs and this latest investment opens up the possibility of us supplying these eggs from locally grown broodstock.

"We're planning a series of upgrades to the existing facilities at Holywood, using Scottish suppliers as much as possible, then we will go into full production later this year. Deliveries will be from November to June initially. Longer-term we hope to extend to year-round production of up to 50 million eggs annually."

According to the Scottish Environment Protection Agency, Scottish Sea Farms [transferred the operation of the Holywood salmon hatchery to AquaGen in September 2018](#):

Operator Transfer	
Transfer Date	20/09/2018
Old Operator	Scottish Sea Farms Ltd
New Operator	AquaGen Scotland Ltd

Data supplied by Marine Scotland on 25/10/2019

Site Details	
Site ID	FS0614
Site Name	Hollywood Breeding Centre
Address	Hollywood Salmon Farm Hollywood Dumfries DG2 0RJ
Telephone Number	01387 721381
Date Registered	17/01/1992
Operator	AquaGen Scotland Ltd
Aquaculture Type	Fish
Water Type	Freshwater
Species	Atlantic Salmon, Atlantic Salmon, Atlantic Salmon
Health Surveillance Frequency	Medium
Production reported to Marine Scotland within last 3 years?	Yes
National Grid Reference	NX976782
Easting	297600
Northing	578200
Marine Scotland Management Area	Not in a management area
Local Authority	Dumfries and Galloway
Region	Dumfries & Galloway
View on Map	<a href="#">View on map</a>

Data supplied by Marine Scotland on 25/10/2019

Watch a video report from AquaGen's Hollywood salmon farm [online here](#)



Read more via:

[Easter Egg Ban for 'Scottish' Salmon?](#)

[Deadly virus outbreak prompted fears over import of fish farm eggs to Scotland](#)

[Game Ova for Scottish Salmon - Deadly disease delays egg imports from AquaGen in Norway](#)

[Concerns raised over Scottish salmon roe imports](#)  
['Secret' Scottish Salmon - Norwegian-owned Scottish Sea Farms refuse to disclose information for ova imports as it would "cause substantial harm to their commercial interests"](#)  
[Government 'failing to protect Scottish salmon'](#)  
[Complete Mockery of the Brand 'Scottish Salmon': Norway bans import of Scottish salmon eggs citing disease risks & genetic impacts under the Nature Diversity Act](#)  
[Imported eggs ruling 'makes a mockery of Scottish salmon'](#)  
[Norway keeps ban on import of Scottish roe](#)  
[Tartan imposters' charge as fish egg imports hit 90%](#)  
[Invasion of the Viking salmon](#)  
[Fish farms are 'wiping out Scotland's wild salmon'](#)  
[Escaped farmed salmon impacts](#)  
['Norwegian' genes found in wild salmon populations in Wester Ross](#)

Read more background on FOI victories on the salmon farming front via:



[Victory for Freedom of Information](#)  
[FOI Number Five – getting you the information they don't want you to see!](#)  
[S&TCS FOI Requests: Scottish Government still not responding lawfully](#)  
[EXPOSED: Photo Disclosures Opens Floodgates to More Diseased & Deformed Scottish Salmon](#)  
[Salmon firms bid to block diseased fish photos](#)

