

## Scottish Salmon Watch, 13 February 2019

### Game Ova for Scottish Salmon

- **Deadly disease delays egg imports from AquaGen in Norway**
- **Minister left with 'egg on her face' during opening of Scottish Sea Farms hatchery**

Documents [obtained via Freedom of Information](#) reveal that risks over the spread of deadly Infectious Salmon Anaemia delayed (or cancelled altogether) a shipment of 2.5 million salmon ova (eggs) from AquaGen in Norway to Scottish Sea Farms in November 2018 [1].



The ova were destined for a [£48 million new hatchery in Oban](#) operated by Scottish Sea Farms ([owned by the Norwegian companies SalMar and Leroy](#)) which was officially opened by Scotland's Minister for Public Finance and Digital Economy in November 2018.



Scottish Sea Farms' managing director Jim Gallagher with Kate Forbes. Photo: SSF

The [51 pages of documents disclosed by the Scottish Government](#) reveal disease fears raised by the European Commission's Directorate-General for Health and Food Safety (DG SANTE), UK Government, Scottish Government and Germany.

In July 2017, [Hendrix Genetics \(owners of Landcatch\)](#) asked the [Scottish Government](#) "if the ISA outbreaks in Norway, in particular AquaGen, would have any effect on their ability to export eggs into Scotland".

Read FOI documents in full via [Disease risk information related to importing salmon and lumpsucker ova: EIR release](#) (Scottish Government, 4 February 2019)

The sorry salmon saga is acutely embarrassing for the Scottish Government who have allowed hundreds of millions of potentially infected ova to be imported from Norway since the 1990s despite [Norway's ban on the import of ova from Scotland due to disease risks](#). The latest Scottish Government data [published in October 2018](#) reveals that 90% of the ova laid down to hatch on 'Scottish' salmon farms in 2017 were actually foreign (mostly from Norway) with over 500 million ova imported since 2003 [2].

Infectious Salmon Anaemia (ISA) is a [notifiable disease](#) which must be [reported to the World Organisation for Animal Health](#) (OIE) and infection with genotype HPR-deleted of the genus Isavirus (ISAV) is listed as a non-exotic disease under Annex IV, Part II of [Council Directive 2006/88/EC](#) (as amended in [2014/22/EU](#)).

In 2009, [ISA hit Norwegian-owned Grieg Seafood in Shetland](#) and [Scottish Sea Farms](#) and in 1998-9 an [ISA outbreak traced to Norwegian-owned Hydro Seafoods](#) (re-named Scottish Sea Farms - [a subsidiary of Norskott Havbruk AS owned jointly by the Norwegian companies Leroy and SalMar](#)) [cost the industry £100 million and led to the loss of 200 jobs](#) [3].

Data [disclosed by the Scottish Government via Freedom of Information in September 2018](#) revealed that 58 million ova were imported during 2017 (with at least another 38 million ova imported in the first six months of 2018). 64 million ova were imported from Norway during 2017 and the first six months of 2018 (another 7 million ova imported for use by Scottish Sea Farms were of unknown origin since the data was redacted) [4].

Information [obtained via FOI from the Scottish Government in November 2018](#) reveals that AquaGen imported over 22.6 million ova in 2016 into Scottish salmon farms and hatcheries (another 5.5 million ova could have been sourced from AquaGen but the data for Scottish Sea Farms was redacted) [5].

In a [blistering email to Fergus Ewing \(Cabinet Secretary for Rural Economy & Connectivity\) in February 2018](#), 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". In another [email in February 2018 the Cabinet Secretary](#) was warned that Norway's ban on ova imports from Scotland "reeks of discriminatory trade practice".

On 6 February 2019, Scottish Salmon Watch filed a FOI request: "It would be particularly embarrassing for the Scottish Government, Scottish Enterprise, Scottish Sea Farms and AquaGen if the integrity of their ["state of the art new £48m freshwater salmon hatchery"](#) had been compromised by the import of ISA-infected ova," stated the FOI [6].

On 7 February 2019, Scottish Salmon Watch filed a FOI request with the Norwegian Food Safety Authority (Mattilsynet) [7].

"Scottish salmon is playing a deadly game of Norwegian roulette," said [Don Staniford, Director of Scottish Salmon Watch](#). "As a matter of precaution there should be a complete ban on ova imports, especially from companies like AquaGen with a dubious history of Infectious Salmon Anaemia. If the Scottish Government is so proud of 'Scottish' salmon then why not source ova from Scotland?"



"Scottish salmon is a sham, scam and a consumer con which should be avoided like the plague," continued Staniford. "Look under 'Scottish' salmon's kilt and a Viking helmet is lurking underneath. Scottish salmon should be sold with a 'Made in Norway' warning label."

Video reports from Don Staniford available [online here](#) - including:



**Contact:**

Don Staniford: 07771 541826 ([salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com))

## FOI Disclosure - Key Documents:

The [FOI documents disclosed by the Scottish Government to Scottish Salmon Watch on 1 February 2019](#) reveal:

On 7 November 2018, [a Senior Fish Health Inspector in the Scottish Government told colleagues](#) that they were "very wary of an export happening":

**From:** <REDACTED> (MARLAB)  
**Sent:** 07 November 2018 15:34  
**To:** <REDACTED> <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>;  
<REDACTED><[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>  
**Subject:** Imports from Aquagen Rimstad

Hi

I have had notification that Aquagen Norway plan to export salmon ova from Rimstad to Scotland on 21 November, 2 days after their 60 day assessment period is completed for the reinstatement of their ISA free status.

I am aware that there have been some questions raised by the UK and other countries. Do you know if these have been resolved? I am very wary of an export happening so soon after the end of the assessment period when I know that queries have been raised.

Thanks

<REDACTED>  
<REDACTED>  
Senior Fish Health Inspector  
Marine Scotland Science  
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB  
Tel: <REDACTED>  
Mob<REDACTED>  
Fax: +44 (0)131 244 0944  
S/B: +44 (0)131 244 2500  
e: <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>  
w: <http://www.gov.scot/Topics/marine>

On 8 November 2018, [a Senior Fish Health Inspector at CEFAS referred](#) to concerns raised by an anonymous party (name redacted) regarding the intended export of ova from AquaGen's Rimstad facility to a Scottish fish farm:

**From:** <REDACTED> (Cefas) <[REDACTED@cefasscot.co.uk](mailto:REDACTED@cefasscot.co.uk)>  
**Sent:** 08 November 2018 17:22  
**To:** <REDACTED> (DEFRA) <[REDACTED@defra.gov.uk](mailto:REDACTED@defra.gov.uk)>  
**Cc:** <REDACTED> (DEFRA) <[REDACTED@defra.gov.uk](mailto:REDACTED@defra.gov.uk)>; <REDACTED> (Cefas) <[REDACTED@cefasscot.co.uk](mailto:REDACTED@cefasscot.co.uk)>; <REDACTED> <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>; <REDACTED> (MARLAB) <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>  
**Subject:** Approved Compartment Declaration Rimstad Norway

Dear <REDACTED>

Attached is our response to the Norwegian Rimstad declaration which needs to be with the Commission by the 19<sup>th</sup> November to be within the 60 day period. The comments are a combination of Cefas and Marine Scotland's and as you will see we do not support the declaration pending the clarification of a number of issues.

You will have seen the concerns raised by <REDACTED> (attached) regarding the intended export of ova from Rimstad to a Scottish farm only two days after the 60 day consultation period. We therefore require clarification from the Commission either through SCoPAFF or as with our last objection direct from <REDACTED> as to the status of the site and its ability to trade as disease free post the 60 day period if there are unresolved issues raised by Member States. Until our concerns have been adequately addressed by the Norwegian CA we would support Marine Scotland in refusing the import of salmon ova from this site.

This declaration was highlighted by the Commission during the AHL meeting in July with regard to how the site is seeking freedom and we are aware that other MS's have issues with the declaration. Therefore we expect the Commission to be prepared for objections to the declaration and respond quickly.

Regards

<REDACTED>

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<REDACTED>  
Senior Fish Health Inspector  
Barrack Road, Weymouth, Dorset, DT4 8UB, UK  
Tel: <REDACTED>| Mob: <REDACTED>| Email: <[REDACTED@cefasscot.co.uk](mailto:REDACTED@cefasscot.co.uk)>  
Web: [www.gov.uk/cefasscot](http://www.gov.uk/cefasscot)

On 13 November 2018, a [press release issued by Scottish Enterprise](#) flagged up the Minister's visit with Scottish Sea Farms referring to "the healthiest fish":

13 November 2018

## State of the art new £48m freshwater salmon hatchery to create high-value jobs from 2019

[Downloads](#)



Salmon farming company Scottish Sea Farms (SSF) is to open a new £48 million Freshwater Hatchery at Barcaldine near Oban, with the aim of further improving how fish are farmed in Scotland.

Scottish Sea Farms Managing Director, Jim Gallagher, said: "Researching and developing new approaches and technologies is key to ensuring that we continue raising the healthiest fish in the most responsible but also the most environmentally sustainable way, and this latest £48m investment aims to advance our work in both areas."

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

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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.

On 14 November 2018, a [blog by the Scottish Government referred](#) to the Minister's visit to Barcaldine to "officially open Scottish Sea Farms' new £48 million freshwater hatchery":

## In the news: £1.3 million commitment to aquaculture

November 14, 2018 by [Alan Bannon](#) [No Comments](#)

### £48 million freshwater hatchery opened near Oban

Public Finance Minister Kate Forbes was in the news today as she visited Barcaldine to officially open Scottish Sea Farms' (SFF) new £48 million freshwater hatchery – which is intended to be a centre of excellence for fish farming. The Scottish Government, through it's enterprise agency Scottish Enterprise, provided a £1.3 million grant to develop the centre.



Speaking from the site, Ms Forbes said:

*"Scotland has a thriving food and drink sector with salmon exports alone growing by 35 per cent during 2017, recognising the global reputation for our quality produce.*

*"Ensuring that the sector grows in a sustainable way remains a priority for us. It is great to see an ambitious and respected company like Scottish Sea Farms investing in innovation to improve environmental control, health issues and production efficiencies. I'd like to congratulate the company on raising the bar, and wish them every success on their sustainable growth journey."*

On 14 November 2018, the UK Government [raised objections](#) to the import of ova to a Scottish fish farm from Norway scheduled for 21 November 2018:

**From:** <REDACTED> (DEFRA)  
**Sent:** Wednesday, November 14, 2018 1:49 PM  
**To:** <REDACTED> (SANTE) <REDACTED>@ec.europa.eu; <REDACTED> (SANTE) <REDACTED>@ec.europa.eu  
**Cc:** <REDACTED> (DEFRA) <REDACTED>@defra.gsi.gov.uk; <REDACTED> (CEFAS) <REDACTED>@cefas.co.uk; <REDACTED>@gov.scot  
**Subject:** Compartment Declaration Rimstad Norway  
**Importance:** High

Dear <REDACTED> and <REDACTED>

Please find below the UK's comments on the Norwegian proposed declaration of freedom for the compartment Rimstad that is due to the Commission by the 19<sup>th</sup> November to be within the 60 day period.

**We are not in support of this declaration.**

The comments combine concerns raised by Cefas and Marine Scotland, which Defra supports. We do not support the declaration pending the clarification of a number of issues.

Please note that this is a critical issue for Scotland in particular, as there is an export of ova from Rimstad to a Scottish farm due on 21<sup>st</sup> November 2018, only two days after the 60 day consultation period.

We therefore require clarification from the Commission either through SCoPAFF or as with our last objection directly from you as to the status of the site and its ability to trade as disease free post the 60 day period if there are unresolved issues raised by Member States. Until our concerns have been adequately addressed by the Norwegian CA we would support Marine Scotland to object to the import of salmon ova from this site.

On 14 November 2018, [the Scottish Government stated that the shipment of imported ova would be inspected and may be destroyed or returned to source:](#)

**From:** <REDACTED> (MARLAB)  
**Sent:** 14 November 2018 14:15  
**To:** <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>  
**Cc:** <REDACTED>@gov.scot>; <REDACTED>@gov.scot>;

<REDACTED>@gov.scot>  
**Subject:** RE: Approved Compartment Declaration Rimstad Norway

Hi <REDACTED>

Just to answer a couple of your questions from a few emails ago.

I replied to <REDACTED> at AquaGen on 7 November when I received his initial email letting us know of the plan export and asked him for an update on the approval process as queries had been raised about the application. I haven't received a reply from him yet and I have sent him a further email today (copied to <REDACTED> at AquaGen) asking him for an update. If the UK's query has only been submitted today then maybe issues have yet to be raised with AquaGen or Mattilsynet.

I have emailed SSF today to make arrangements to inspect the consignment on arrival (we inspect a percentage on arrival) and to inform them that the ISA free declaration for Rimstad has not gone through yet and if there are any delays in the process then the import cannot proceed next week as the site would not meet the standard to export to the UK.

If the declaration is not confirmed on Monday then the export should not proceed as Mattilsynet cannot issue a health certificate that meets the health requirements of the UK. If the eggs arrive and the declaration isn't confirmed, we could issue a notice under Regulation 30(2) of TARP as the animals do not comply with the requirements of article 3 of Directive 90/425. They would fail to satisfy the requirements of Directive 2006/88 as per article 3 (1a) (movement from Category II to Category I is not allowed). This notice requires the ova either to be destroyed or returned to source (with approval of Mattilsynet).

Thanks

<REDACTED>

On 19 November 2018, the [UK Government stated](#) that "these eggs are destined for a brand new recirculation facility which was opened by Ministers two weeks ago":

**From:** <REDACTED> (DEFRA) <[REDACTED@defra.gsi.gov.uk](mailto:REDACTED@defra.gsi.gov.uk)>  
**Sent:** Monday, November 19, 2018 11:24 AM  
**To:** <REDACTED> (SANTE); <REDACTED> (SANTE); <REDACTED> (CEFAS); <REDACTED>@gov.scot'; <REDACTED> (CEFAS); SANTE CONSULT-G2; [SANTE-CONSULT-G5@ec.europa.eu](mailto:SANTE-CONSULT-G5@ec.europa.eu)  
**Cc:** <[REDACTED@bmel.bund.de](mailto:REDACTED@bmel.bund.de)>; <REDACTED> (DEFRA); <REDACTED> (SANTE)  
**Subject:** PAFF Committee on 19th September 2018; re: A.11 Information concerning declaration from Norway on disease free status for Infectious Salmon Anaemia (ISA) of an independent compartment Rimstad in Tingvoll

Dear <REDACTED> and <REDACTED>,

Can you please clarify whether the declaration has now been approved by the commission, or whether the queries made by Germany on Friday has put this on hold?

We were content with the responses we received from Norway last week. However, our main concern is now that if we accept the eggs and are not completely sure of the declaration status – we could potentially jeopardise the Scottish disease free status should we find out a later date the declaration was put on hold.

Furthermore, the company will be preparing the eggs today – if they are sent over and the declaration has not been officially approved, Scotland would have to destroy them. We would want to avoid both these eventualities.

Aside from this these eggs are destined for a brand new recirculation facility which was opened by Ministers two weeks ago. We would like to be certain that we are taking the correct course of action.

On 19 November 2018, the Scottish Government and the Norwegian Government [exchanged emails](#):

**Fra:** <REDACTED>@gov.scot

**Sendt:** mandag 19. november 2018 13:44

**Til:** <REDACTED><REDACTED>@mattilsynet.no;

<REDACTED><<REDACTED>@mattilsynet.no>

**Kopi:** <REDACTED>@defra.gsi.gov.uk; <REDACTED>@defra.gsi.gov.uk;

<REDACTED>@cefas.co.uk; <REDACTED>@cefas.co.uk;

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;

<REDACTED>@gov.scot

**Emne:** Rimstaad compartment declaration

Dear <REDACTED>and <REDACTED>

Thank you for addressing the concerns raised on the Rimstaad declaration by the UK last week. The Commission has confirmed that the Rimstaad declaration is currently on hold until concerns raised by other Member States are addressed.

We have received a TRACES notification for the movement of 2.5 million ova from Rimstaad to Scotland, planned for 21 November. I would be grateful if you could confirm that this movement will not take place until confirmation of the declaration has been received. I know this is a rapidly evolving situation and you might expect to resolve concerns today. Grateful to be kept updated.

Best regards

<REDACTED>

<REDACTED>

Scottish Government – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: <REDACTED>

**From:** <REDACTED><<REDACTED>@mattilsynet.no>

**Sent:** 19 November 2018 13:53

**To:** <REDACTED>@gov.scot; <REDACTED>@mattilsynet.no>

**Cc:** <REDACTED>@defra.gsi.gov.uk' <REDACTED>@defra.gsi.gov.uk';

<REDACTED>@cefas.co.uk' <REDACTED>@cefas.co.uk'; <REDACTED>

(MARLAB) <REDACTED>@gov.scot; <REDACTED> (MARLAB)

<REDACTED>@gov.scot; <REDACTED> (MARLAB) <REDACTED>@gov.scot;

<REDACTED> (MARLAB) <REDACTED>@gov.scot; <REDACTED> (MARLAB)

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot>

**Subject:** SV: Rimstaad compartment declaration

Dear <REDACTED>

Of course, NFSA will not certify the movement of ovas before the issues concerning the Rimstad declaration are fully solved.

Best regards,

<REDACTED>

## Background:

In October 2018, Scottish Salmon Watch [revealed](#) that the Scottish Government had refused to name the country and company from which Scottish Sea Farms sourced ova. Disclosure would "cause substantial harm to their commercial interests" and would "give competitors an advantage by revealing company or industrial commercial strategy" [claimed the Scottish Government in a FOI refusal letter dated 19 September 2018](#).

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]

Hence information relating to the 12.5 million ova imported by Scottish Sea Farms between January 2017 and March 2018 has been redacted:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Number	Source Country	Source Company
09/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	400,000	REDACTED	REDACTED
23/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	2,200,000	REDACTED	REDACTED
30/11/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	400,000	REDACTED	REDACTED
08/12/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	300,000	REDACTED	REDACTED
07/02/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	1,500,000	REDACTED	REDACTED
01/03/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	800,000	REDACTED	REDACTED
18/01/2017	Knock Hatchery	Scottish Sea Farms Ltd		1,500,000	REDACTED	REDACTED
09/02/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		1,500,000	REDACTED	REDACTED
07/11/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		745,000	REDACTED	REDACTED
18/01/2018	Knock	Scottish Sea Farms Ltd		1,550,000	REDACTED	REDACTED
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		1,600,000	REDACTED	REDACTED

"We recognise that there is a public interest in disclosing information as part of open and transparent government," [concluded the Scottish Government in their letter dated 19 September 2018](#). "However, there is a greater public interest in protecting the commercial interests of companies that provide employment and contribute economically to Scotland."

Between January 2017 and March 2018, The Scottish Salmon Company imported 10.3 million ova from Iceland and Norway (including [ISA-infected AquaGen](#)):

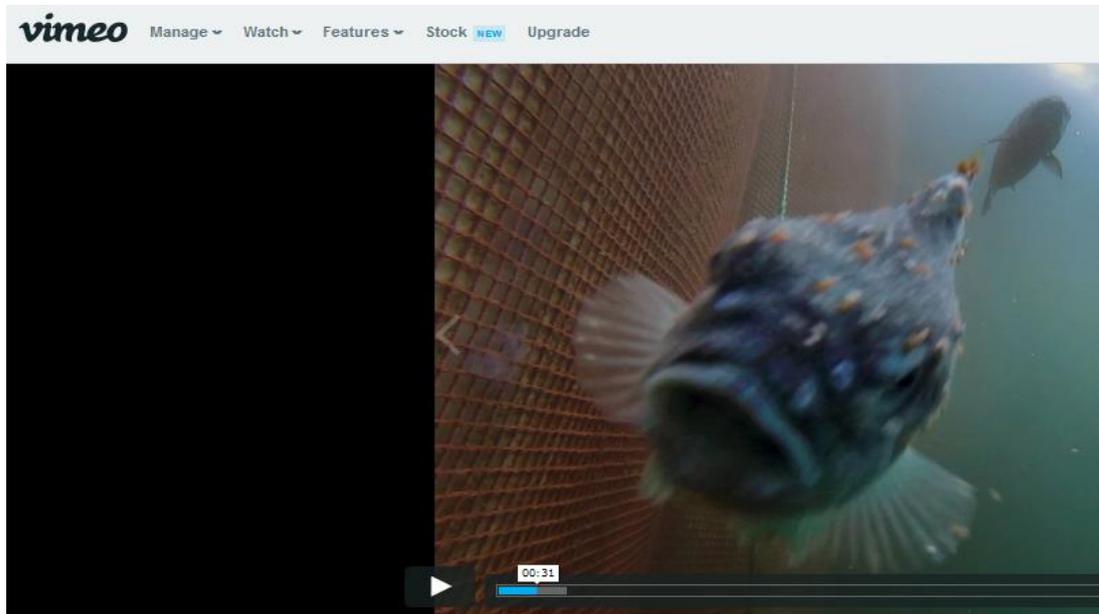
Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Number	Source Country	Source Company
01/03/2017	Geocrab Hatchery	The Scottish Salmon Company		396,000	Norway	AquaGen AS
23/02/2017	Geocrab Hatchery	The Scottish Salmon Company		55,000	Iceland	Stofniskur
09/11/2017	Tulich Hatchery	The Scottish Salmon Company		2,714,250	Iceland	Stofniskur
22/11/2017	Kinlochmoidart Hatchery	The Scottish Salmon Company		1,522,500	Iceland	Stofniskur
15/11/2017	Barvas Hatchery	The Scottish Salmon Company		172,000	Iceland	Stofniskur
15/11/2017	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company	918,750	Iceland	Stofniskur
01/02/2018	Tulich Hatchery	The Scottish Salmon Company		1,360,000	Iceland	Stofniskur
30/01/2018	Barvas Hatchery	The Scottish Salmon Company		1,047,500	Norway	Salmobreed
30/01/2018	Amhuinnsuidhe Hatchery	The Scottish Salmon Company		400,000	Norway	Salmobreed
01/03/2018	Kinlochmoidart Hatchery	The Scottish Salmon Company		615,000	Iceland	Stofniskur
01/03/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	The Scottish Salmon Company	575,000	Iceland	Stofniskur
27/02/2018	Geocrab Hatchery	The Scottish Salmon Company		508,000	Norway	Salmobreed

Between January 2017 and February 2018, Cooke Aquaculture imported 7.6 million ova from Iceland, Ireland and Norway (including [ISA-infected AquaGen](#)):

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Number	Source Country	Source Company
16/02/2017	Ardaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd		400,000	Norway	AquaGen AS
16/02/2017	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Freshwater	1,400,000	Rep of Ireland	Marine Harvest Ireland
09/03/2017	Rysa Incubation Unit	Rysa Salmon Farm	Cooke Aquaculture Freshwater	170,000	Norway	AquaGen AS
04/04/2017	Furnace Hatchery	Cooke Aquaculture (Freshwater) Ltd		1,000,000	Iceland	Stofniskur
08/11/2017	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Freshwater	2,500,000	Iceland	Stofniskur
14/02/2018	Wester Fearn	Highland Salmon Company Ltd	Cooke Aquaculture Freshwater	700,000	Rep of Ireland	Marine Harvest Ireland
21/02/2018	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Freshwater	1,100,000	Rep of Ireland	Marine Harvest Ireland
27/02/2018	Ardaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd		350,000	Norway	Marine Harvest Norway

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

In September 2018, video footage of lice-infested salmon and cleaner fish at Scottish Sea Farms' salmon farm in Loch Spelve was [published by Scottish Salmon Watch](#).



### Secret Filming Inside Scottish Salmon Farms - Diseased & Deformed Farmed Salmon (& Lice-Infested 'Cleaner Fish')

In May 2018, Scottish Salmon Watch [revealed](#) that the Norwegian Government had banned imports of salmon ova from Scotland citing unacceptable disease risks. 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](#).

In a stinging attack 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 the [email to Fergus Ewing dated 12 February 2018](#).



"Phrases other than smart and successful come to mind" wrote [Neil Manchester, Managing Director of Hendrix Genetics](#) (owner of Landcatch), in [an email to the Cabinet Secretary for Rural Economy & Connectivity](#) pointing out that "the extensive R&D projects conducted between Landcatch and the Universities of Glasgow, Stirling and Edinburgh, once lauded as great examples of Smart Successful Scotland, will now require the involvement of Norwegian breeding companies operating in Norway."

"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](#) dated 9 February 2018 from [Norway's Ministry of Climate & Environment](#) to Hendrix Genetics. "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."

In an email [obtained via FOI in December 2018 from the Scottish Government](#), the Cabinet Secretary for Rural Economy & Connectivity (Fergus Ewing) was warned that Norway's ban on ova imports "reeks of discriminatory trade practice":

From: [REDACTED]  
Sent: 18 February 2018 11:30  
To: Cabinet Secretary for the Rural Economy and Connectivity  
Cc: [REDACTED]  
Subject: FW: [REDACTED]  
Importance: High

Dear Fergus

This seems very unfair, and reeks of discriminatory trade practice given that their refusal means they can dominate the Scottish market and knock out the only other player in it.

Surely we should be protesting and making it clear publicly we disagree?

Information [obtained via FOI from the Scottish Government in November 2018](#) reveals that AquaGen imported over 22.6 million ova in 2016 [3].

[FOI documents disclosed by the Scottish Government to Scottish Salmon Watch on 1 February 2019 reveal](#) that Scottish salmon and trout farmers received ova during the 2016/2017 season from broodstock held at a [ISA suspected site operated by AquaGen at Tingvoll](#):

---

From: <REDACTED> (MARLAB)  
Sent: 11 July 2017 15:08  
To: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>  
(MARLAB) <REDACTED>@gov.scot>; <REDACTED>@gov.scot>; <REDACTED> (MARLAB)  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>  
(MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>;  
<REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> <REDACTED>@gov.scot>;  
<REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB)  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>;  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>  
Cc: <REDACTED>@gov.scot>  
Subject: ISA suspected at AquaGen Tingvoll

<http://aquagen.no/en/2017/07/10/ila-mistanke-hos-aquagen-tingvoll/>

Please see report from AquaGen that ISA has been detected at one of their broodfish production sites at Tingvoll. I have spoken with <REDACTED> and there has been no associated mortality, this is from their routine surveillance testing. Results in April, May and June were negative. Fish are likely to be culled out, but the result has not been confirmed yet by the competent authority (PCR only).

Scottish producers have received salmon and rainbow trout ova during the 2016/2017 season which originated from broodstock held at Tingvoll. The 2017/2018 season ova will be sourced from their other broodstock population held at Hemne.

<REDACTED>

In July 2017, [Hendrix Genetics \(owners of Landcatch\)](#) asked the Scottish Government "if the ISA outbreaks in Norway, in particular Aquagen, would have any effect on their ability to export eggs into Scotland":

From: <REDACTED> <[REDACTED](mailto:<REDACTED>@hendrix-genetics.com)>@hendrix-genetics.com  
Sent: 11 July 2017 13:19  
To: <REDACTED> (MARLAB)  
Subject: ISA in Norway

Hi <REDACTED>

I was just wondering if the ISA outbreaks in Norway, in particular Aquagen, would have any effect on their ability to export eggs into Scotland this year. Where does Marine Scotland stand on this issue.

Any information would be gratefully received.

Kind Regards

<REDACTED>

**From:** <REDACTED> <REDACTED>@hendrix-genetics.com  
**Sent:** 19 July 2017 10:02  
**To:** <REDACTED> (MARLAB)  
**Subject:** Aquagen eggs

Hi <REDACTED>

I was just wondering what your thoughts are on the Aquagen situation now that the site at Hemne also seems to be affected. Can MS ask for 100% testing for ISA on all broodfish parents of eggs destined for Scotland or are you still reliant on the Norwegians to say they are free of the disease.

Kind Regards

<REDACTED>

<REDACTED>  
<REDACTED>  
Atlantic Salmon

T <REDACTED>  
M <REDACTED>475  
<REDACTED>  
W [www.landcatch.co.uk](http://www.landcatch.co.uk)



Landcatch Natural Selection Ltd  
Ormsary Fish Farm, Lochgilphead  
Argyll, PA31 8PE, Scotland, UK-EU

Read more via:

[Restrictions due to ISA suspicion also attached to AquaGens' broodfish departments at the Vestseøra site in Hemne municipality](#)

[ISA detected at salmon broodstock sites](#)

[Aquagen ISA outbreak: cause unknown, but damage contained](#)

Salmon Business [reported in January 2018](#):



**ISA in roe could create supply bottleneck**

**In just half a year, three Norwegian brood facilities have shown signs of infectious salmon anemia, or ISA.**

It was just after Christmas, when a report came in that ISA was suspected at the Profunda facility in Oersta township.

Just weeks earlier, ISA was identified at a SalMar brood facility in Rauma township. In the summer, ISA showed up at AquaGen Tingvoll.

#### **Problematic**

Does this affect AquaGen's exports to, say, Scotland?

"We have found another solution. We lost the one export permit to Scotland and found another solution this year with a partner that delivers to Scotland. We'll be back with deliveries to Scotland in mid-2018," AquaGen's Nina Santi told *SalmonBusiness*.

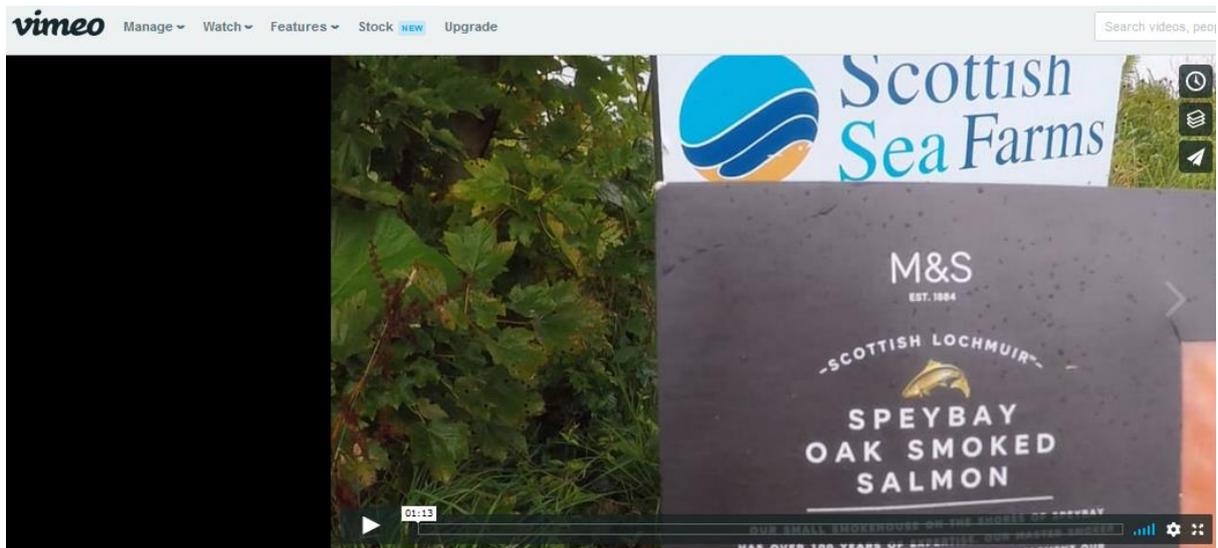
*Three ISA cases in half a year. Does that threaten roe deliveries abroad?*

"Yes, you have to have a special permit for an area historically ISA-free or been monitored for two years. Many facilities have that status or are on the way to getting it. Should too many lose their certificates it might become problematic," she said.

Read more via:

[ISA in roe could create supply bottleneck](#)

Scottish Sea Farms is the [exclusive supplier for fake brand 'Lochmuir'](#) sold by Marks & Spencer and [certified as 'welfare friendly' by RSPCA Assured](#).



**M&S's Fake 'Lochmuir' Salmon Belongs in the Bin!**

See all video stats  
Only visible to you

In 2013, [The Sunday Times reported](#) that one in four wild Atlantic salmon from Scotland was genetically "tainted" by Norwegian fish [following scientific research by Rivers & Fisheries Trusts Scotland](#).

In 2013, [The Sunday Times reported](#) that "Scots fish are ‘Vikings with kilts on’".

In 2013, Marine Harvest [sold their 31% stake in AquaGen](#) with [Cermaq selling their shares in AquaGen on the same day](#).

In 2011, [The New York Times fingered AquaGen](#) as the likely source of the ISA outbreak in Chile following a scientific paper [published in the Archives of Virology](#).

Read more via:

[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](#)

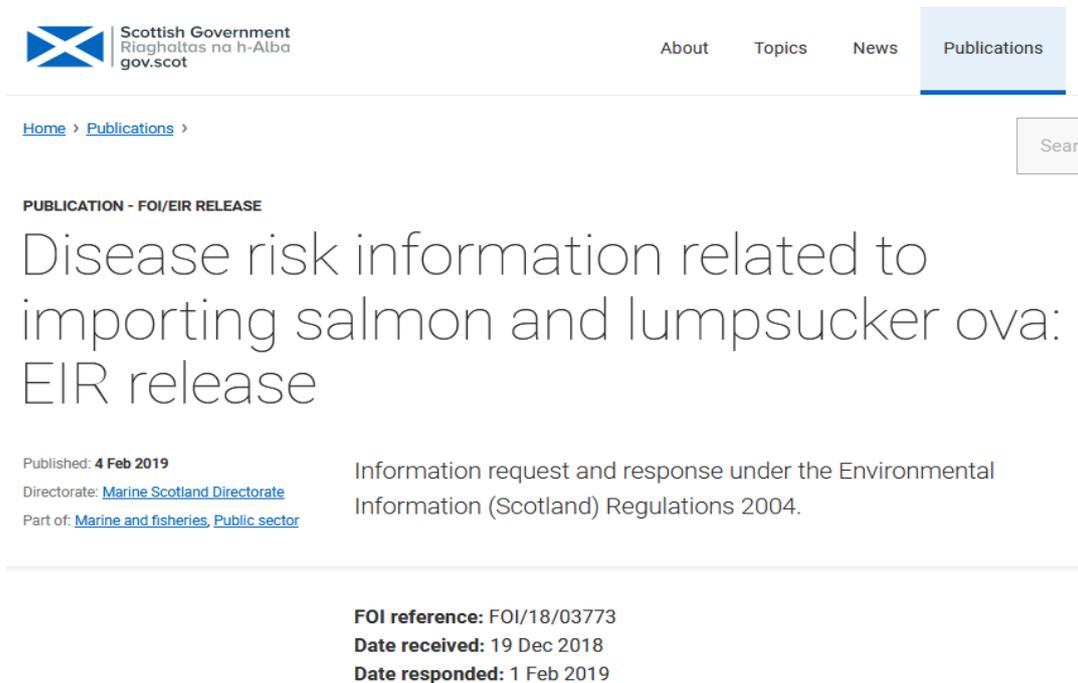
[Fish farms are 'wiping out Scotland's wild salmon'](#)

[Escaped farmed salmon impacts](#)

['Norwegian' genes found in wild salmon populations in Wester Ross](#)

## Notes to Editors:

[1]



The screenshot shows the Scottish Government website (gov.scot) with a navigation menu including 'About', 'Topics', 'News', and 'Publications'. The 'Publications' section is active. Below the navigation, there is a breadcrumb trail: 'Home > Publications >'. A search box is visible on the right. The main content area displays the title 'Disease risk information related to importing salmon and lumpsucker ova: EIR release' under the heading 'PUBLICATION - FOI/EIR RELEASE'. Below the title, it states 'Published: 4 Feb 2019' and provides details about the Directorate ('Marine Scotland Directorate') and the sector ('Marine and fisheries, Public sector'). To the right of this information, it says 'Information request and response under the Environmental Information (Scotland) Regulations 2004.' At the bottom of the page, the following details are listed: 'FOI reference: FOI/18/03773', 'Date received: 19 Dec 2018', and 'Date responded: 1 Feb 2019'.

Online in full via [Disease risk information related to importing salmon and lumpsucker ova: EIR release](#) (Scottish Government, 4 February 2019)

[2] 59.2 million out of 65.7 million (90%) of the ova laid down to hatch in 2017 were foreign ova.

Table 18: Source, number (000s) and previous year's estimate of ova laid down to hatch during 2006-2018

Year	In-house broodstock	Out-sourced GB broodstock	GB wild broodstock	Foreign ova	Total	Previous year's estimate
2006	19,063	17,768	63	27,157	64,051	58,385
2007	18,837	14,366	78	42,022	75,303	68,032
2008	19,831	14,261	171	26,409	60,672	75,302
2009	17,148	20,158	65	30,200	67,571	64,693
2010	13,744	26,220	0	29,657	69,621	61,011
2011	15,664	14,630	0	34,322	64,616	54,526
2012	18,556	9,981	0	34,700	63,237	55,723
2013	16,996	8,263	0	41,315	66,573	49,249
2014	14,418	2,725	10	53,684	70,837	48,149
2015	6,479	223	10	61,463	68,175	65,284
2016	5,884	4	0	58,458	64,346	59,604
2017	6,228	360	0	59,158	65,746	60,673
2018						67,374

p16 of the Scottish Government's [2017 Scottish Fish Farm Production Survey](#) (October 2018)

Data [disclosed by the Scottish Government via FOI in November 2018](#) detailed a staggering 342 million ova imported from Norway between 2003 and 2015 (out of 462 million ova imported - i.e. Norway represented 74% of ova imports):

Country of origin	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Australia	550,000	1,860,000	0	2,400,000	0	0	0	0	0	0	0	0	0
Iceland	9,518,000	3,475,000	570,000	300,000	0	0	0	0	0	0	2,719,000	4,346,000	8,978,000
Norway	2,900,000	6,750,000	13,210,000	15,940,000	33,555,000	22,703,000	29,938,000	26,533,000	35,851,000	23,848,000	35,044,000	49,831,000	45,926,000
Rep of Ireland	7,820,000	4,450,000	2,610,000	11,575,000	10,511,000	5,600,000	5,460,000	2,150,000	3,400,000	10,134,000	10,700,000	5,218,000	4,815,000
USA	400,000	450,000	450,000	0	0	0	0	0	0	0	0	0	0

Numbers of salmon ova collated from health certificates

A [paper published in the journal Aquaculture in 2016](#) revealed how Scottish salmon farming has been flooded by imports of foreign ova since the early 2000s:

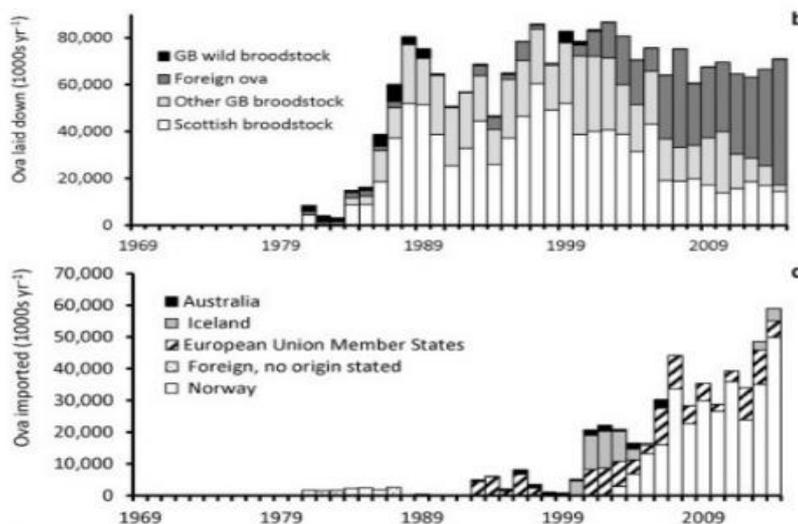


Fig. 2. Data on salmon ova in Scotland. a: Numbers of ova produced in Scotland, subdivided into laid down in Scotland, exported and not laid or exported. Data available 1984/1994/1995–2014. b: Origins of ova laid down to hatch within Scottish salmon industry. Data available 1981–2014. c: Origins of foreign (imported) ova. Data available 1981–2014.

[3] Read more via:

[Scottish Sea Farms confirms it owns ISA-infected site](#)  
[Minister criticises industry over ISA](#)  
[Shetland Islands to cut salmon farms as ISA spreads](#)  
[ISA will put 27 Scottish fish farms out of action](#)  
[Shetlanders get £3m ISA loan](#)  
[New ISA Case Found in Shetland Control Zone](#)  
[Fish virus detected at third farm](#)  
[Second ISA case confirmed in Scotland](#)  
[ISA back to haunt fish farmers](#)  
[Deadly salmon infection detected](#)  
[ISA disease suspected at Marine Harvest farm](#)  
[The scientific issues surrounding the control of Infectious Salmon Anaemia in Scotland](#)  
[ISA cost Scottish industry £100 million](#)  
[ISA report published by Scottish Executive](#)  
[Lethal fish infection spreads](#)  
[£25.68 million loss in Scotland](#)  
[ISA can wipe out farms](#)  
[More ISA found](#)  
[Infectious Salmon Anaemia - Diary of Disease Disaster](#)

[4] Data [disclosed by the Scottish Government via Freedom of Information in September 2018](#) revealed that 58 million ova were imported during 2017 (with at least another 38 million ova imported in the first six months of 2018). At least 37 million of the ova imported during 2017 were from Norway (with 7 million ova imported for use by Scottish Sea Farms of unknown origin since the data was redacted).

According to the [FOI disclosure](#), at least 64 million ova were imported from Norway during 2017 and the first six months of 2018 - with the ten biggest ova imports involving Marine Harvest:

Date	Site of destination	Operator	Species	Stage	Number	Source Country	Source Company
16/02/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	4,000,000	Norway	Marine Harvest Norway
16/05/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	3,800,000	Norway	Marine Harvest Norway
16/11/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	3,600,000	Norway	Marine Harvest Norway
18/04/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	3,500,000	Norway	Marine Harvest Norway
22/03/2017	Inverpolly	Finfish Ltd	Salmon	Ova	3,150,000	Norway	Marine Harvest Norway
29/03/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,664,900	Norway	Marine Harvest Norway
04/01/2018	Inverpolly	Finfish Ltd	Salmon	Ova	2,600,000	Norway	Marine Harvest Norway
13/06/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,494,000	Norway	Marine Harvest Norway
10/01/2017	Inverpolly	Finfish Ltd	Salmon	Ova	2,450,000	Norway	Marine Harvest Norway
08/02/2018	Inchmore	Marine Harvest (Scotland) Ltd	Salmon	Ova	2,300,000	Norway	Marine Harvest Norway

5.5 million ova in 2017 were imported from AquaGen in 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
18/01/2017	Mill Burn (Old Mill)	Kintail Hatchery	Migdale Smolts Ltd	Salmon	Ova	2,000,000	Norway	AquaGen AS
01/02/2017	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company	Salmon	Ova	525,000	Norway	AquaGen AS
09/02/2017	Allt Mor	JS Salmon Ltd	Kames Fish Farming Ltd	Salmon	Ova	350,000	Norway	AquaGen AS
16/02/2017	Duartmore Hatchery	Loch Duart		Salmon	Ova	330,000	Norway	AquaGen AS
16/02/2017	Ardtaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd		Salmon	Ova	400,000	Norway	AquaGen AS
16/02/2017	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company	Salmon	Ova	562,500	Norway	AquaGen AS
01/03/2017	Geocrab Hatchery	The Scottish Salmon Company		Salmon	Ova	396,000	Norway	AquaGen AS
09/03/2017	Rysa Incubation Unit	Rysa Salmon Farm	Cooke Aquaculture Freshwater Ltd	Salmon	Ova	170,000	Norway	AquaGen AS

Data for a further 12.5 million ova imports destined for Scottish Sea Farms during 2017 and the first six months of 2018 were redacted:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number	Source Country	Source Company
18/01/2017	Knock Hatchery	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	REDACTED	REDACTED
09/02/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	1,500,000	REDACTED	REDACTED
09/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	400,000	REDACTED	REDACTED
23/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	2,200,000	REDACTED	REDACTED
07/11/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	745,000	REDACTED	REDACTED
30/11/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	400,000	REDACTED	REDACTED
08/12/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	300,000	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
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	1,600,000	REDACTED	REDACTED
01/03/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	Salmon	Ova	800,000	REDACTED	REDACTED

Download the Excel spreadsheet in full online via [FOI Salmon ova imports 2017 2018 data for release 19 Sep 2018](#)



FOI Salmon ova imports 2017 2018 de

[5] Information [obtained via FOI from the Scottish Government in November 2018](#) reveals that AquaGen imported over 22.6 million ova in 2016 into Scottish salmon farms and hatcheries:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number	Source Country	Source Company
14/01/2016	Mill Burn	Kintail Hatchery	Marine Harvest (Scotland)	Salmon	Ova	2,000,000	Norway	Aquagen AS
05/01/2016	Quoys Hatchery	Cooke Aquaculture Scotland Ltd		Salmon	Ova	550,000	Norway	Aquagen AS
20/01/2016	Howietoun Hatchery	Howietoun Fishery	The Scottish Salmon Company	Salmon	Ova	400,000	Norway	Aquagen AS
20/01/2016	Barvas Hatchery	The Scottish Salmon Company		Salmon	Ova	1,908,540	Norway	Aquagen AS
10/02/2016	Ardaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd		Salmon	Ova	400,000	Norway	Aquagen AS
24/02/2016	Geocrab Hatchery	The Scottish Salmon Company		Salmon	Ova	461,160	Norway	Aquagen AS
24/02/2016	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company	Salmon	Ova	564,375	Norway	Aquagen AS
24/02/2016	Ailt Mor Hatchery	JS Salmon Ltd	Kames Fish Farming Ltd	Salmon	Ova	500,000	Norway	Aquagen AS
02/03/2016	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company	Salmon	Ova	575,000	Norway	Aquagen AS
02/03/2016	Amhuinnsuidhe Hatchery	The Scottish Salmon Company		Salmon	Ova	275,000	Norway	Aquagen AS
02/03/2016	Quoys Hatchery	Cooke Aquaculture Scotland Ltd		Salmon	Ova	70,000	Norway	Aquagen AS
17/03/2016	Furnace (FW)	Cooke Aquaculture (Freshwater) Ltd		Salmon	Ova	650,000	Norway	Aquagen AS
02/06/2016	Lochailort Recirculation Unit	Marine Harvest (Scotland)		Salmon	Ova	1,333,333	Norway	Aquagen AS
02/06/2016	Lochailort Recirculation Unit	Marine Harvest (Scotland)		Salmon	Ova	1,333,333	Norway	Aquagen AS
02/06/2016	Lochailort Recirculation Unit	Marine Harvest (Scotland)		Salmon	Ova	1,333,333	Norway	Aquagen AS
23/08/2016	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)		Salmon	Ova	1,500,000	Norway	Aquagen AS
09/11/2016	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company	Salmon	Ova	562,500	Norway	Aquagen AS
09/11/2016	Ailt Mor Hatchery	JS Salmon Ltd	Kames Fish Farming Ltd	Salmon	Ova	350,000	Norway	Aquagen AS
15/11/2016	Furnace (FW)	Cooke Aquaculture (Freshwater) Ltd		Salmon	Ova	800,000	Norway	Aquagen AS
15/11/2016	Cairndow Hatchery	Lakeland (Cairndow) Ltd		Salmon	Ova	1,800,000	Norway	Aquagen AS
22/11/2016	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)		Salmon	Ova	1,500,000	Norway	Aquagen AS
22/11/2016	Quoys Hatchery	Cooke Aquaculture Scotland Ltd		Salmon	Ova	400,000	Norway	Aquagen AS
06/12/2016	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company	Salmon	Ova	918,750	Norway	Aquagen AS
06/12/2016	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company	Salmon	Ova	628,500	Norway	Aquagen AS
06/12/2016	Barvas Hatchery	The Scottish Salmon Company		Salmon	Ova	735,000	Norway	Aquagen AS
15/12/2016	Ardaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd		Salmon	Ova	350,000	Norway	Aquagen AS
21/12/2016	Ailt Mor Hatchery	JS Salmon Ltd	Kames Fish Farming Ltd	Salmon	Ova	325,000	Norway	Aquagen AS
21/12/2016	Quoys Hatchery	Cooke Aquaculture Scotland Ltd		Salmon	Ova	400,000	Norway	Aquagen AS

In addition, another 5.5 million ova could have been sourced from AquaGen but this information has been redacted:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number	Source Country	Source Company
04/02/2016	Knock Hatchery	Scottish Sea Farms Ltd		Salmon	Ova	1100000	<REDACTED>	<REDACTED>
10/02/2016	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	150,000	<REDACTED>	<REDACTED>
18/02/2016	<REDACTED>	<REDACTED>	Scottish Sea Farms Ltd	Salmon	Ova	2,100,000	<REDACTED>	<REDACTED>
03/03/2016	<REDACTED>	<REDACTED>	Scottish Sea Farms Ltd	Salmon	Ova	144,000	<REDACTED>	<REDACTED>
17/11/2016	Couldoran Incubation Unit	Scottish Sea Farms Ltd		Salmon	Ova	1,000,000	Norway	<REDACTED>
08/12/2016	<REDACTED>	<REDACTED>	Scottish Sea Farms Ltd	Salmon	Ova	988,000	<REDACTED>	<REDACTED>

[Information obtained via FOI from the Scottish Government in February 2019](#) included:

**From:** <REDACTED> (MARLAB)  
**Sent:** 12 July 2017 13:49  
**To:** <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>  
**Cc:** <REDACTED> (MARLAB) <REDACTED>@gov.scot>  
**Subject:** FW: Information update

Hi

This is the information from <REDACTED> on the ISA detection at Aquagen.

In summary, Aquagen have detected ISA at the seawater broodstock site Merraberget and the freshwater site at Rimstad, Tingvoll which received broodstock from Merraberget in May. This is to be confirmed by Mattilsynet. Samples taken in April, May and June by a private laboratory for ISA were negative, but the July samples were positive.

Scottish sites received ova in 2016/2017 from both Hemne (unconnected location) and Tingvoll hatcheries but the broodstock stripped for the 2016/2017 season were held previously at a sea site known as Hegebergetroa, not the currently affected site. I don't know the relation of the two sea sites to one another, but the reports state that Merraberget is more than 10km from any other site.

Andy has provided a list of the source hatcheries for all of the 2016/2017 consignments delivered to Scotland. Do we need to conduct any follow up surveillance at this point or do we need to contact Mattilsynet for further information?

Thanks

<REDACTED>

[6]

**From:** Don Staniford [mailto:salmonfarmingkills@gmail.com]  
**Sent:** 06 February 2019 10:08  
**To:** 'ceu@scotland.gsi.gov.uk'  
**Cc:** 'MSP'; 'Neil.Purvis@gov.scot'; 'Helen.McGregor@gov.scot'  
**Subject:** FOI re. Scottish Sea Farms, import of ova from Norway & disease concerns since 1 January 2016

Please provide information on Scottish Sea Farms in relation to the import of ova from Norway and disease concerns since 1 January 2016.

Please include any emails, letters, complaints and any other correspondence and documentation pertaining to Scottish Sea Farms in relation to the import of ova from Norway and disease concerns since 1 January 2016.

In particular, please provide documentation pertaining to the level of knowledge the Minister for Public Finance and Digital Economy (Kate Forbes MSP is copied in here) when officially opening the Scottish Sea Farms hatchery at Barcaldine in November 2018.

The Oban Times [reported on 13 November 2018](#) that the hatchery was taking delivery "next week" of 2.5 million eggs from Norway:

## 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.

How much did the Minister and the Scottish Government know about import of eggs from Norway and the disease risks?

Have the salmon eggs now been imported, and if so, when were they imported?

Please provide documentation in relation to their import (or non-import) from Norway and/or other source.

Information disclosed on 1 February 2019 by the Scottish Government via FOI/18/03773 suggests that the Scottish and UK authorities were well aware of the disease risks of importing ova (eggs) from Norway and in particular the risk of Infectious Salmon Anaemia (ISA) from AquaGen (a [company identified by The New York Times](#) as the potential source of ISA imported from Norway to Chile - and a company [formerly owned by Marine Harvest](#)) as early as 2017 and that Scottish salmon farmers had received ova from an ISA-infected site during 2016/2017:

---

From: <REDACTED> (MARLAB)  
Sent: 11 July 2017 15:08  
To: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>  
(MARLAB) <REDACTED>@gov.scot>; <REDACTED>@gov.scot>; <REDACTED> (MARLAB)  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>  
(MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>;  
<REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> <REDACTED>@gov.scot>;  
<REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB)  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>;  
<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>  
Cc: <REDACTED>@gov.scot>  
Subject: ISA suspected at AquaGen Tingvoll

<http://aquagen.no/en/2017/07/10/ila-mistanke-hos-aquagen-tingvoll/>

Please see report from AquaGen that ISA has been detected at one of their broodfish production sites at Tingvoll. I have spoken with <REDACTED> and there has been no associated mortality, this is from their routine surveillance testing. Results in April, May and June were negative. Fish are likely to be culled out, but the result has not been confirmed yet by the competent authority (PCR only).

Scottish producers have received salmon and rainbow trout ova during the 2016/2017 season which originated from broodstock held at Tingvoll. The 2017/2018 season ova will be sourced from their other broodstock population held at Hemne.

<REDACTED>

**From:** <REDACTED> <REDACTED>@hendrix-genetics.com

**Sent:** 11 July 2017 13:19

**To:** <REDACTED> (MARLAB)

**Subject:** ISA in Norway

Hi <REDACTED>

I was just wondering if the ISA outbreaks in Norway, in particular Aquagen, would have any effect on their ability to export eggs into Scotland this year. Where does Marine Scotland stand on this issue.

Any information would be gratefully received.

Kind Regards

<REDACTED>

**From:** <REDACTED> <REDACTED>@hendrix-genetics.com

**Sent:** 19 July 2017 10:02

**To:** <REDACTED> (MARLAB)

**Subject:** Aquagen eggs

---

Hi <REDACTED>

I was just wondering what your thoughts are on the Aquagen situation now that the site at Hemne also seems to be affected. Can MS ask for 100% testing for ISA on all broodfish parents of eggs destined for Scotland or are you still reliant on the Norwegians to say they are free of the disease.

It is also clear from the information disclosed on 1 February 2019 by the Scottish Government via FOI/18/03773 that there was a flurry of discussions in November 2018 relating to the import (or not as the case may be) of ova sourced from AquaGen in Norway:

**From:** <REDACTED> (MARLAB)  
**Sent:** 14 November 2018 14:15  
**To:** <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>  
**Cc:** <REDACTED>@gov.scot>; <REDACTED>@gov.scot>;

<REDACTED>@gov.scot>

**Subject:** RE: Approved Compartment Declaration Rimstad Norway

Hi <REDACTED>

Just to answer a couple of your questions from a few emails ago.

I replied to <REDACTED> at AquaGen on 7 November when I received his initial email letting us know of the plan export and asked him for an update on the approval process as queries had been raised about the application. I haven't received a reply from him yet and I have sent him a further email today (copied to <REDACTED> at AquaGen) asking him for an update. If the UKs query has only been submitted today then maybe issues have yet to be raised with AquaGen or Mattilsynet.

I have emailed SSF today to make arrangements to inspect the consignment on arrival (we inspect a percentage on arrival) and to inform them that the ISA free declaration for Rimstad has not gone through yet and if there are any delays in the process then the import cannot proceed next week as the site would not meet the standard to export to the UK.

If the declaration is not confirmed on Monday then the export should not proceed as Mattilsynet cannot issue a health certificate that meets the health requirements of the UK. If the eggs arrive and the declaration isn't confirmed, we could issue a notice under Regulation 30(2) of TARP as the animals do not comply with the requirements of article 3 of Directive 90/425. They would fail to satisfy the requirements of Directive 2006/88 as per article 3 (1a) (movement from Category II to Category I is not allowed). This notice requires the ova either to be destroyed or returned to source (with approval of Mattilsynet).

Thanks

<REDACTED>

**From:** <REDACTED> (MARLAB)  
**Sent:** 07 November 2018 15:34  
**To:** <REDACTED> <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>;  
<REDACTED><[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>  
**Subject:** Imports from Aquagen Rimstad

Hi

I have had notification that Aquagen Norway plan to export salmon ova from Rimstad to Scotland on 21 November, 2 days after their 60 day assessment period is completed for the reinstatement of their ISA free status.

I am aware that there have been some questions raised by the UK and other countries. Do you know if these have been resolved? I am very wary of an export happening so soon after the end of the assessment period when I know that queries have been raised.

Thanks

<REDACTED>  
<REDACTED>  
Senior Fish Health Inspector  
Marine Scotland Science  
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB  
Tel: <REDACTED>  
Mob<REDACTED>  
Fax: +44 (0)131 244 0944  
S/B: +44 (0)131 244 2500  
e: <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>  
w: <http://www.gov.scot/Topics/marine>

**Fra:** <REDACTED>@gov.scot

**Sendt:** mandag 19. november 2018 13:44

**Til:** <REDACTED><REDACTED>@mattilsynet.no;

<REDACTED><<REDACTED>@mattilsynet.no>

**Kopi:** <REDACTED>@defra.gsi.gov.uk; <REDACTED>@defra.gsi.gov.uk;

<REDACTED>@cefas.co.uk; <REDACTED>@cefas.co.uk;

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;

<REDACTED>@gov.scot

**Emne:** Rimstaad compartment declaration

Dear <REDACTED>and <REDACTED>

Thank you for addressing the concerns raised on the Rimstaad declaration by the UK last week. The Commission has confirmed that the Rimstaad declaration is currently on hold until concerns raised by other Member States are addressed.

We have received a TRACES notification for the movement of 2.5 million ova from Rimstaad to Scotland, planned for 21 November. I would be grateful if you could confirm that this movement will not take place until confirmation of the declaration has been received. I know this is a rapidly evolving situation and you might expect to resolve concerns today. Grateful to be kept updated.

Best regards

<REDACTED>

<REDACTED>

Scottish Government – Aquaculture, Crown Estate, Recreational Fisheries, EMFF

**From:** <REDACTED> (DEFRA) <[REDACTED@defra.gsi.gov.uk](mailto:REDACTED@defra.gsi.gov.uk)>  
**Sent:** Monday, November 19, 2018 11:24 AM  
**To:** <REDACTED> (SANTE); <REDACTED> (SANTE); <REDACTED> (CEFAS); <REDACTED>@gov.scot'; <REDACTED> (CEFAS); SANTE CONSULT-G2; [SANTE-CONSULT-G5@ec.europa.eu](mailto:SANTE-CONSULT-G5@ec.europa.eu)  
**Cc:** <[REDACTED@bmel.bund.de](mailto:REDACTED@bmel.bund.de)>; <REDACTED> (DEFRA); <REDACTED> (SANTE)  
**Subject:** PAFF Comité on 19th September 2018; re: A.11 Information concerning declaration from Norway on disease free status for Infectious Salmon Anaemia (ISA) of an independent compartment Rimstad in Tingvoll

Dear <REDACTED> and <REDACTED>,

Can you please clarify whether the declaration has now been approved by the commission, or whether the queries made by Germany on Friday has put this on hold?

We were content with the responses we received from Norway last week. However, our main concern is now that if we accept the eggs and are not completely sure of the declaration status – we could potentially jeopardise the Scottish disease free status should we find out a later date the declaration was put on hold.

Furthermore, the company will be preparing the eggs today – if they are sent over and the declaration has not been officially approved, Scotland would have to destroy them. We would want to avoid both these eventualities.

Aside from this these eggs are destined for a brand new recirculation facility which was opened by Ministers two weeks ago. We would like to be certain that we are taking the correct course of action.

It would be particularly embarrassing for the Scottish Government, Scottish Enterprise, Scottish Sea Farms and AquaGen if the integrity of their "[state of the art new £48m freshwater salmon hatchery](#)" had been compromised by the import of ISA-infected ova.

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13 November 2018

## State of the art new £48m freshwater salmon hatchery to create high-value jobs from 2019

Downloads



Salmon farming company Scottish Sea Farms (SSF) is to open a new £48 million Freshwater Hatchery at Barcaldine near Oban, with the aim of further improving how fish are farmed in Scotland.

### MEDIA CONTACTS

If you have a media enquiry please e-mail [presso@scotent.co.uk](mailto:presso@scotent.co.uk)

### Tweets by @ScotEntNews

Scot Enterprise News @ScotEntNews  
RT @ingledewstephen: Scotland is welcoming a growing number of international #FinTech firms through a global #collaboration and #inclusivegrowth .agenda #ScotlandIsNow @ScotDevInt @FinTechScotland @ScotFinEnt @scotgoveconomy twitter.com/scotfinent/sta...

Scot Enterprise News @ScotEntNews

The "[sustainable growth journey](#)" touted by the Minister for Public Finance and Digital Economy and "[national success story](#)" hailed by Kirsteen Binnie of Scottish Enterprise may turn out to be false.

It does not augur well that Scottish Sea Farms and the Scottish Government have refused to disclose where Scottish Sea Farms import ova. As Scottish Salmon Watch [reported in October 2018](#):

**Scottish Salmon Watch, 12 October 2018**

**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"**
- **58 million ova used for 'Scottish' salmon imported from Norway, Iceland & Ireland (including 7 million of unknown origin) in 2017**

Campaigners are calling for transparency and full disclosure of the origin of ova (eggs) imported for use in 'Scottish' salmon farming. In September, the Scottish Government refused to disclose import information for Scottish Sea Farms ([owned by the Norwegian companies Leroy & Salmar](#)) citing "the confidentiality of commercial information".

Import information on the origin of ova imports involving other 'Scottish' salmon farming companies was disclosed including [Norwegian-owned Marine Harvest](#), [Norwegian-owned Grieg Seafood](#), [Canadian-owned Cooke Aquaculture](#) and [Swiss-controlled The Scottish Salmon Company](#). Scottish Salmon Watch is now considering an appeal to the Scottish Information Commissioner.

Including:

Disclosure of information relating to where Scottish Sea Farms import ova would "cause substantial harm to their commercial interests" and would "give competitors an advantage by revealing company or industrial commercial strategy" claimed the Scottish Government in a FOI refusal letter dated 19 September 2018 [2].

Hence information relating to the 12.5 million ova imported by Scottish Sea Farms between January 2017 and March 2018 has been redacted:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Number	Source Country	Source Company
09/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	400,000	REDACTED	REDACTED
23/02/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	2,200,000	REDACTED	REDACTED
30/11/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	400,000	REDACTED	REDACTED
08/12/2017	REDACTED	REDACTED	Scottish Sea Farms Ltd	300,000	REDACTED	REDACTED
07/02/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	1,500,000	REDACTED	REDACTED
01/03/2018	REDACTED	REDACTED	Scottish Sea Farms Ltd	800,000	REDACTED	REDACTED
18/01/2017	Knock Hatchery	Scottish Sea Farms Ltd		1,500,000	REDACTED	REDACTED
09/02/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		1,500,000	REDACTED	REDACTED
07/11/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		745,000	REDACTED	REDACTED
18/01/2018	Knock	Scottish Sea Farms Ltd		1,550,000	REDACTED	REDACTED
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		1,600,000	REDACTED	REDACTED

"We recognise that there is a public interest in disclosing information as part of open and transparent government," concluded the Scottish Government in their letter dated 19 September 2018. "However, there is a greater public interest in protecting the commercial interests of companies that provide employment and contribute economically to Scotland."

In May 2017, Scottish Sea Farms was given the go-ahead for the development of a [£35 million hatchery](#) near Oban. Watch video report [online here](#)

Based on the new information disclosed on 1 February 2019 by the Scottish Government via FOI/18/03773, it seems that Scottish Sea Farms and the Scottish Government have a great deal to hide. Surely the Scottish Government should be protecting wild fish from imported infectious diseases rather than protecting the commercial interests of companies?

Lest you forget that the introduction of ISA ([a notifiable disease reportable to the EU and OIE](#)) into Scotland in 1998-9 "[cost the industry £100m and led to the loss of 200 jobs](#)".

In summary:

Please provide information on Scottish Sea Farms in relation to the import of ova from Norway and disease concerns since 1 January 2016.

Please include any emails, letters, complaints and any other correspondence and documentation pertaining to Scottish Sea Farms in relation to the import of ova from Norway and disease concerns since 1 January 2016.

In particular, please provide documentation pertaining to the level of knowledge the Minister for Public Finance and Digital Economy (Kate Forbes MSP is copied in here) when officially opening the Scottish Sea Farms hatchery at Barcaldine in November 2018.

How much did the Minister and the Scottish Government know about import of eggs from Norway and the disease risks?



In regards to your request of February 8th 2019, we will review your request in accordance with the rules laid down in the Freedom of Information Act (offentleglova: <https://lovdata.no/dokument/NL/lov/2006-05-19-16>)

You have requested information related to an extensive number of documents.

We will need some time to evaluate your request, but will process your request as soon as possible.

We will attend to your request as soon as possible, and preferably within the month of February.

Best regards,

**Martine Male Kolberg**

Adviser

Mattilsynet / Norwegian Food Safety Authority, Head Office, Section fish health and welfare

+ 47 22 77 91 48

Postal address: Mattilsynet, Head Office, Felles postmottak, Postboks 383, 2381 Brumunddal

E mail: [postmottak@mattilsynet.no](mailto:postmottak@mattilsynet.no)

[www.mattilsynet.no](http://www.mattilsynet.no) [www.matportalen.no](http://www.matportalen.no)

Martine Male Kolberg

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[www.mattilsynet.no](http://www.mattilsynet.no) [www.matportalen.no](http://www.matportalen.no)

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

**Sent:** 07 February 2019 14:36

**To:** 'innsynshenvendelser@mattilsynet.no'

**Subject:** Innsynshenvendelser re. imports of salmon eggs to Scotland (including the Rimstad case & AquaGen)

Please consider this an official Freedom of Information request under the appropriate regulations.

Please provide information since 1 January 2017 on the import of salmon eggs (ova) to Scotland.

Please include any assessments of disease risks, health certificates and disease risk analysis.

Please include correspondence with the European Commission, Scottish Government, UK Government, AquaGen, Scottish Sea Farms, Leroy, SalMar and any other parties.

As context, a FOI reply received on 1 February 2019 from the Scottish Government included:

**From:** <REDACTED><<REDACTED>@mattilsynet.no>  
**Sent:** 19 November 2018 13:53  
**To:** <REDACTED>@gov.scot>; <REDACTED>@mattilsynet.no>  
**Cc:** <REDACTED>@defra.gsi.gov.uk' <REDACTED>@defra.gsi.gov.uk'; <REDACTED>@cefas.co.uk' <REDACTED>@cefas.co.uk'; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>@gov.scot>; <REDACTED>@gov.scot>; <REDACTED>@gov.scot>  
**Subject:** SV: Rimstaad compartment declaration

Dear <REDACTED>

Of course, NFSA will not certify the movement of ovas before the issues concerning the Rimstad declaration are fully solved.

Best regards,

<REDACTED>

**Fra:** <REDACTED>@gov.scot

**Sendt:** mandag 19. november 2018 13:44

**Til:** <REDACTED><REDACTED>@mattilsynet.no;

<REDACTED><<REDACTED>@mattilsynet.no>

**Kopi:** <REDACTED>@defra.gsi.gov.uk; <REDACTED>@defra.gsi.gov.uk;

<REDACTED>@cefas.co.uk; <REDACTED>@cefas.co.uk;

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;

<REDACTED>@gov.scot; <REDACTED>@gov.scot; <REDACTED>@gov.scot;

<REDACTED>@gov.scot

**Emne:** Rimstaad compartment declaration

Dear <REDACTED>and <REDACTED>

Thank you for addressing the concerns raised on the Rimstaad declaration by the UK last week. The Commission has confirmed that the Rimstaad declaration is currently on hold until concerns raised by other Member States are addressed.

We have received a TRACES notification for the movement of 2.5 million ova from Rimstaad to Scotland, planned for 21 November. I would be grateful if you could confirm that this movement will not take place until confirmation of the declaration has been received. I know this is a rapidly evolving situation and you might expect to resolve concerns today. Grateful to be kept updated.

Best regards

<REDACTED>

<REDACTED>

Scottish Government – Aquaculture, Crown Estate, Recreational Fisheries, EMFF  
and Europe

---

**From:** <REDACTED>

**Sent:** 19 November 2018 12:30

**To:** <REDACTED> (DEFRA) <[REDACTED@defra.gsi.gov.uk](mailto:REDACTED@defra.gsi.gov.uk)>; <REDACTED> (DEFRA) <[REDACTED@defra.gsi.gov.uk](mailto:REDACTED@defra.gsi.gov.uk)>; <REDACTED> (CEFAS) <[REDACTED@cefas.co.uk](mailto:REDACTED@cefas.co.uk)>

**Subject:** RE: PAFF Comitée on 19th September 2018; re: A.11 Information concerning declaration from Norway on disease free status for Infectious Salmon Anaemia (ISA) of an independent compartment Rimstad in Tingvoll

Hi <REDACTED>

Thanks for chasing this. I will alert our FHI that the declaration is currently on hold, but I will also make contact with necessary colleagues in Norway to ask that they keep us up to date in specific reference to the planned movement to Scotland.

Best regards

<REDACTED>

<REDACTED>

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: <REDACTED>

E-mail: <[REDACTED@gov.scot](mailto:REDACTED@gov.scot)>

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

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



**From:** <REDACTED>@ec.europa.eu

**Sent:** 19 November 2018 11:35

**To:** <REDACTED>@defra.gsi.gov.uk

**Cc:** <REDACTED>@bmel.bund.de; <REDACTED>@defra.gsi.gov.uk; <REDACTED>@ec.europa.eu; <REDACTED>@ec.europa.eu; <REDACTED>@ec.europa.eu; <REDACTED>@ec.europa.eu; <REDACTED>@cefas.co.uk; <REDACTED><REDACTED>@gov.scot>; <REDACTED>@cefas.co.uk; SANTE-CONSULT-G2@ec.europa.eu; SANTE-CONSULT-G5@ec.europa.eu

**Subject:** RE: PAFF Comité on 19th September 2018; re: A.11 Information concerning declaration from Norway on disease free status for Infectious Salmon Anaemia (ISA) of an independent compartment Rimstad in Tingvoll

Dear <REDACTED>,

We are working with Germany and Norway on the way ahead while the declaration is put on hold. Norway will know what the status of this compartment is and how it may change after exchanges and what to certify and what not. You can rely on their certification and if ever you have a question, feel free to contact them bilaterally.

Best regards: <REDACTED>

**From:** <REDACTED> (DEFRA) <REDACTED>@defra.gsi.gov.uk  
**Sent:** Monday, November 19, 2018 11:24 AM  
**To:** <REDACTED> (SANTE); <REDACTED> (SANTE); <REDACTED> (CEFAS); <REDACTED>@gov.scot'; <REDACTED> (CEFAS); SANTE CONSULT-G2; [SANTE-CONSULT-G5@ec.europa.eu](mailto:SANTE-CONSULT-G5@ec.europa.eu)  
**Cc:** <REDACTED>@bmel.bund.de; <REDACTED> (DEFRA); <REDACTED> (SANTE)  
**Subject:** PAFF Comité on 19th September 2018; re: A.11 Information concerning declaration from Norway on disease free status for Infectious Salmon Anaemia (ISA) of an independent compartment Rimstad in Tingvoll

Dear <REDACTED> and <REDACTED>,

Can you please clarify whether the declaration has now been approved by the commission, or whether the queries made by Germany on Friday has put this on hold?

We were content with the responses we received from Norway last week. However, our main concern is now that if we accept the eggs and are not completely sure of the declaration status – we could potentially jeopardise the Scottish disease free status should we find out a later date the declaration was put on hold. Furthermore, the company will be preparing the eggs today – if they are sent over and the declaration has not been officially approved, Scotland would have to destroy them. We would want to avoid both these eventualities.

Aside from this these eggs are destined for a brand new recirculation facility which was opened by Ministers two weeks ago. We would like to be certain that we are taking the correct course of action.

**From:** <REDACTED> (MARLAB)

**Sent:** 14 November 2018 14:15

**To:** <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>; <REDACTED> (MARLAB) <REDACTED> @gov.scot>  
**Cc:** <REDACTED> @gov.scot>; <REDACTED> @gov.scot>;

---

<REDACTED> @gov.scot>

**Subject:** RE: Approved Compartment Declaration Rimstad Norway

Hi <REDACTED>

Just to answer a couple of your questions from a few emails ago.

I replied to <REDACTED> at AquaGen on 7 November when I received his initial email letting us know of the plan export and asked him for an update on the approval process as queries had been raised about the application. I haven't received a reply from him yet and I have sent him a further email today (copied to <REDACTED> at AquaGen) asking him for an update. If the UKs query has only been submitted today then maybe issues have yet to be raised with AquaGen or Mattilsynet.

I have emailed SSF today to make arrangements to inspect the consignment on arrival (we inspect a percentage on arrival) and to inform them that the ISA free declaration for Rimstad has not gone through yet and if there are any delays in the process then the import cannot proceed next week as the site would not meet the standard to export to the UK.

If the declaration is not confirmed on Monday then the export should not proceed as Mattilsynet cannot issue a health certificate that meets the health requirements of the UK. If the eggs arrive and the declaration isn't confirmed, we could issue a notice under Regulation 30(2) of TARP as the animals do not comply with the requirements of article 3 of Directive 90/425. They would fail to satisfy the requirements of Directive 2006/88 as per article 3 (1a) (movement from Category II to Category I is not allowed). This notice requires the ova either to be destroyed or returned to source (with approval of Mattilsynet).

**From:** <REDACTED> (MARLAB)  
**Sent:** 15 November 2018 10:44  
**To:** <REDACTED> (MARLAB) <REDACTED>@gov.scot; <REDACTED> (MARLAB) <REDACTED>@gov.scot  
**Cc:** <REDACTED> (MARLAB) <REDACTED>@gov.scot; <REDACTED> (MARLAB) <REDACTED>@gov.scot  
**Subject:** FW: Questions regarding declaration for 18000 Rimstad

As promised from the NFSA...

**From:** <REDACTED> <REDACTED>@mattilsynet.no  
**Sent:** 15 November 2018 10:30  
**To:** <REDACTED>@defra.gsi.gov.uk; <REDACTED> (MARLAB) <REDACTED>@gov.scot; <REDACTED> (MARLAB) <REDACTED>@gov.scot  
**Cc:** <REDACTED>@ec.europa.eu' <REDACTED>@ec.europa.eu>; <REDACTED>@ec.europa.eu' <REDACTED>@ec.europa.eu>; <REDACTED>@ec.europa.eu' <REDACTED>@ec.europa.eu>; <REDACTED>@ec.europa.eu' <REDACTED>@ec.europa.eu>; <REDACTED>@defra.gsi.gov.uk' <REDACTED>@defra.gsi.gov.uk>; <REDACTED>@cefas.co.uk' <REDACTED>@cefas.co.uk>; <REDACTED>@gov.scot; <REDACTED><REDACTED>@mattilsynet.no; <REDACTED><<REDACTED>@mattilsynet.no>  
**Subject:** Questions regarding declaration for 18000 Rimstad

Dear Colleagues,

Please find attached note.

Kind regards,

<REDACTED>  
<REDACTED>  
NFSA, Head Office – Fish Health and Welfare Section

<REDACTED>

## QUESTIONS REGARDING DECLARATION FOR 18000 RIMSTAD

Dear Colleagues,

NFSA would like to answer the questions from UK regarding the declaration for 18000 Rimstad.

### 1. The status of rainbow trout on the site

All fish landed at Rimstad has been accounted for. That is, 2747 brood fish were transferred from ISA-free compartment 12917 Sjølseng to restock Rimstad. 2721 of the transferred fish were sampled, and Annex V (data on testing animals at Rimstad) and Annex 3b identifies these individuals as Atlantic salmon. However, the declaration does only refer to the term "brood fish" regarding the fish transferred from 12917 Sjølseng.

NFSA hereby confirms that only Atlantic salmon has been landed at Rimstad.

Still, the purpose of the land base 18000 Rimstad is to produce eyed salmon and rainbow trout eggs, and hence the plant will receive both Atlantic salmon and rainbow trout brood fish for stripping in the future.

### 2. The failure to test 26 fish

The wording in the declaration under point 5.4, stating that 26 individuals were "sorted out" and "not stripped" is based on a misunderstanding.

The 26 fish not tested were dead fish. All dead fish at the site, including the 26 individuals in question, were autopsied.

The reasoning for 26 dead fish not being tested, is given in the presentation at pages 23 – 25.

Two sampling periods with different test regimes have been performed at Rimstad:

#### a) 19.02.2018 – 30.04.2018 – risk based sampling and screening

In risk based sampling only live fish with clinical symptoms / abnormal behavior (moribund fish) would be selected for sampling. Also, any freshly dead fish with pathological changes would be tested.

In this period, 26 dead fishes were autopsied, but not sampled, either because:

- 1) Autopsy did not show any pathological changes
- 2) Autopsy revealed signs of autolysis, meaning that the individual was not suitable for sampling with respect to freshness

In period a) we have a total of 67 dead fish, all autopsied. 41 of the dead fishes were tested; 26 dead fishes were not tested due to criterion 1 and 2 above.

Note: none of the 41 dead fishes sampled did show any pathological changes at autopsy. Still, the operator sampled a certain number of freshly dead fish in this period for screening purposes.

#### b) 01.05.2018 – 15.08.2018 – 100 percent testing

As the "Rimstad case" evolved, and the operator became aware of the discrepancy between the Directive 2006/88/EC and Decision 2015/1554, the sampling shifted from risk based sampling / screening to 100 percent testing.

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<REDACTED>

<REDACTED> – NFSA – Head Office - Fish Health and Welfare Section

Bergen, Norway - 15.11.2018

