$camon $cotland, 11 June 2023

‘MowiLeaks’ Blows the Whistle on Norwegian Salmon Farming Giant

- Gruesome photos reveal welfare nightmare of RSPCA Assured, Soil Association certified ‘organic’ & ASC-certified ‘responsibly sourced’ Scottish salmon

Leaked documents from a Mowi insider – dubbed ‘MowiLeaks’ – reveals damning details of the Norwegian giant’s global operations including gruesome photos of salmon processed by Mowi in Fort William for sale as “responsibly sourced” Scottish salmon in Sainsbury’s, Tesco, Aldi, Lidl and Asda (all Mowi salmon is certified as ‘welfare friendly’ via RSPCA Assured with the vast majority also certified as ‘responsible’ via the Aquaculture Stewardship Council and ‘organic’ via the Soil Association).

The leak comes a month since $camon $cotland launched a whistleblower hotline – including newspaper adverts placed in the Shetland Times, The National, West Highland Free Press and Stornoway Gazette. Earlier this month (4 June) a Polish version of the whistleblower sticker was launched.

The ‘MowiLeaks’ document dump includes 399 files in English, Norwegian, Polish and Spanish providing details of Mowi’s operations in Scotland, Norway and Chile **[1]**. A Powerpoint file headed ‘Mowi Grading Standards’ dated January 2023 (scheduled to be updated in January 2024) details Mowi’s Product Quality Department Procedure at the Blar Mhor processing plant in Fort William – including shocking ‘Grading Standards Photos’:

MOWI

Sea Lice Damage: Destroyed Fish
Uszkodzenie od wszy morskiej: Ryba przeznaczona do zniszczenia

MOWI

Sea Lice Damage: Ordinary Uszkodzenia od wszy morskich: Zwykła

MOWI

Sea Lice Damage: Ordinary Uszkodzenia od wszy morskich: Zwykła

MOWI

Sea Lice Damage: Ordinary Uszkodzenia od wszy morskich: Zwykła

Large patches of scattered blood spots
Duże obszary wysypki

MOWI

Sea Lice Damage: Rebate Uszkodzenia od wszy morskiej: Do odrzucenia

MOWI

Lesions: Rebate **Zmiany: Do odrzucenia**

Lesion with flesh visable > 50p piece
Zmiany z widocznym mięsem> moneta 50pensów

MOWI

Jaw Deformity: Ordinary **Deformacja szczeki: Zwykla**

MOWI

Wounds: Ordinary **Rany: Zwykła**

Stunner damage where skull visible.
Uszkodzenia od ogłuszacza, gdzie widoczna jest czaszka

MOWI

Wounds: Rebate **Rany: Do odrzucenia**

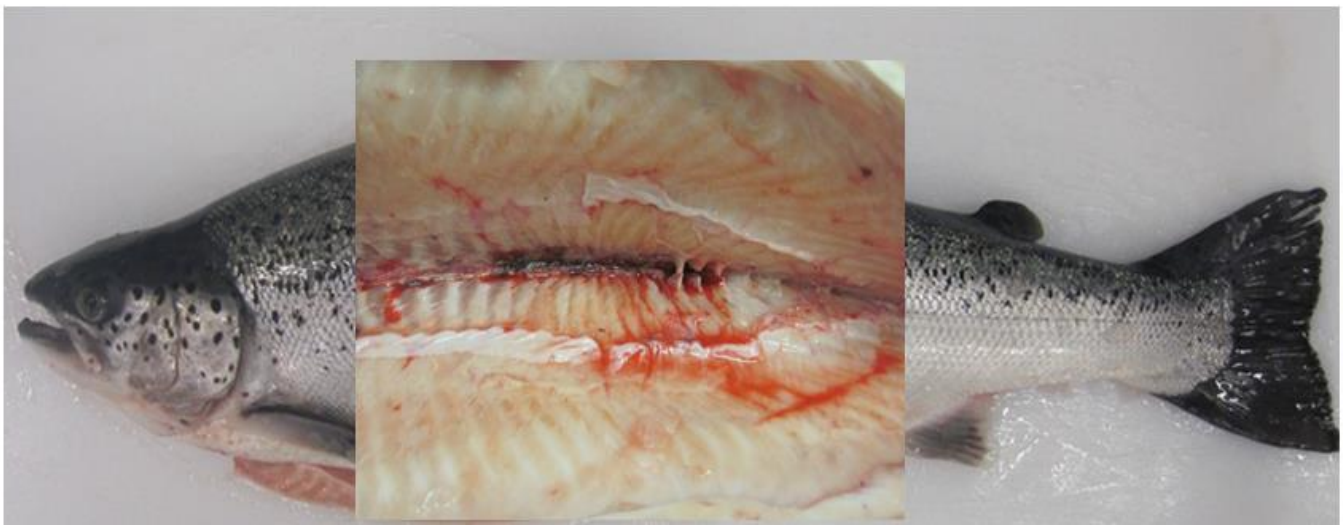
MOWI

Mishape: Rebate Zniekształcona: Do odrzucenia

MOWI

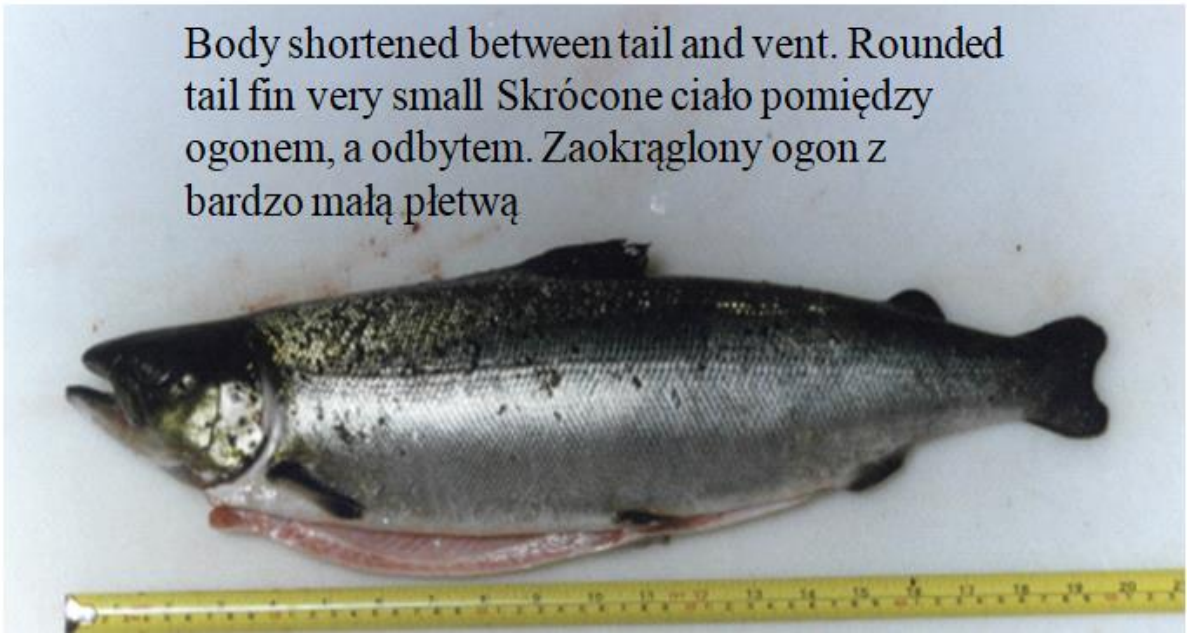
Mishape: Rebate Zniekształcona: Do odrzucenia

Abnormal, obvious curvature of the spine
Nieprawidłowy, widocznie skrzywiony kręgosłup



MOWI

Fins: Ordinary **Płetwy: Zwykła**

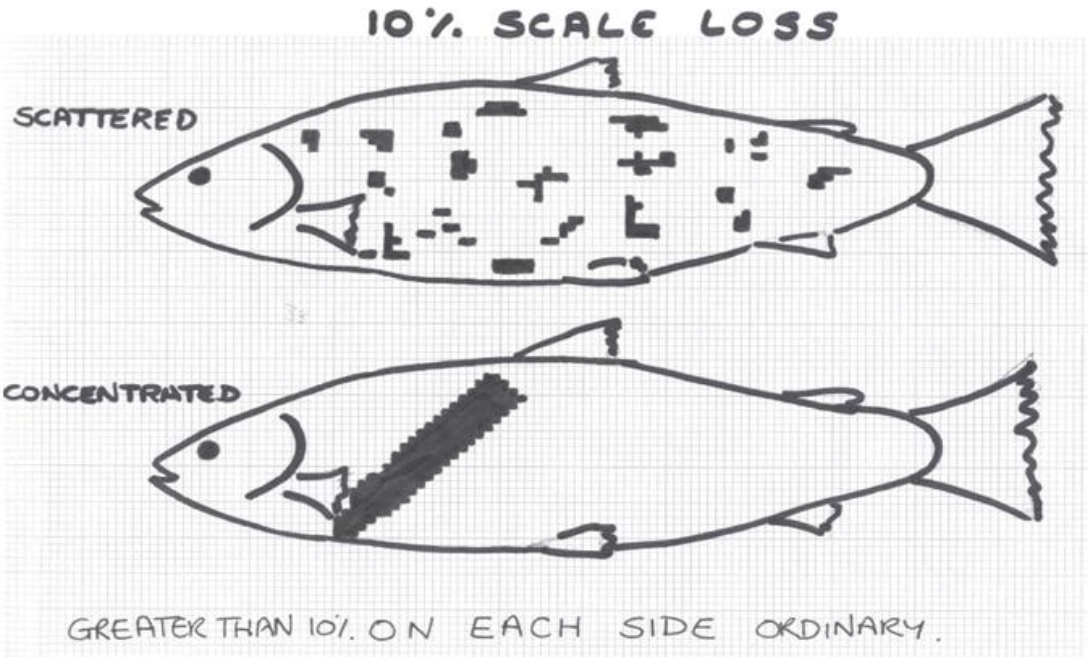


MOWI

Wounds: Rebate **Rany: Do odrzucenia**

MOWI

Scale Loss: Ordinary **Utrata łusek: Zwykła**



MOWI

Scale Loss: Ordinary **Utrata łusek: Zwykła**

Obvious scale loss. Typically greater than 10% on each side.
Widoczna utrata łusek. Przeważnie więcej, niż 10% po każdej stronie.

MOWI

Scale Loss: Ordinary **Utrata lusek: Zwykla**

Red Patch of Flesh Visible where scales have been lost

MOWI

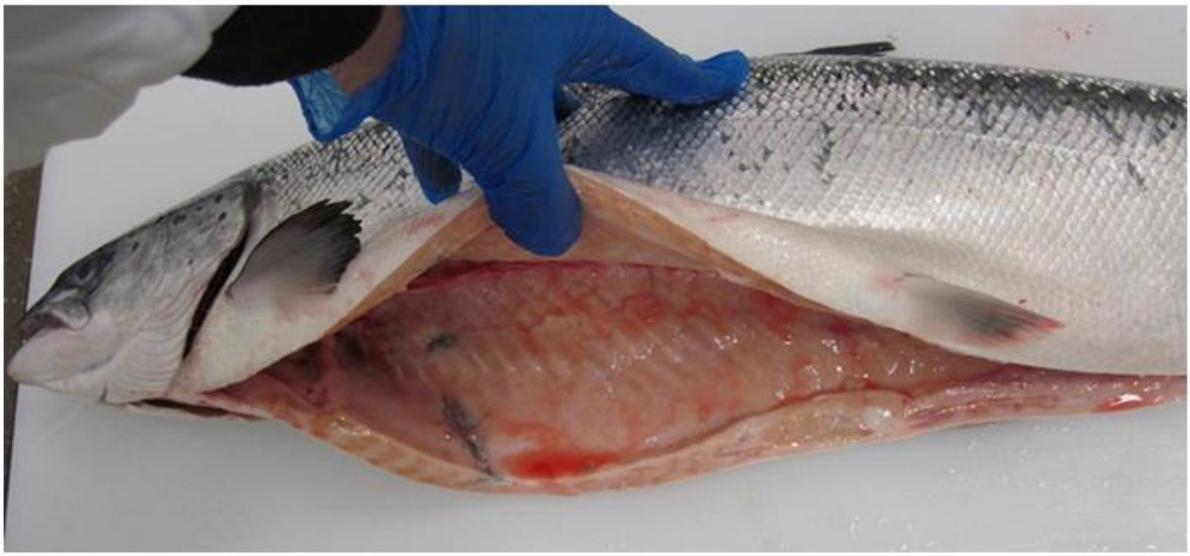
Scale Loss: Ordinary **Utrata lusek: Zwykla**

MOWI

Internal Damage: Rebate

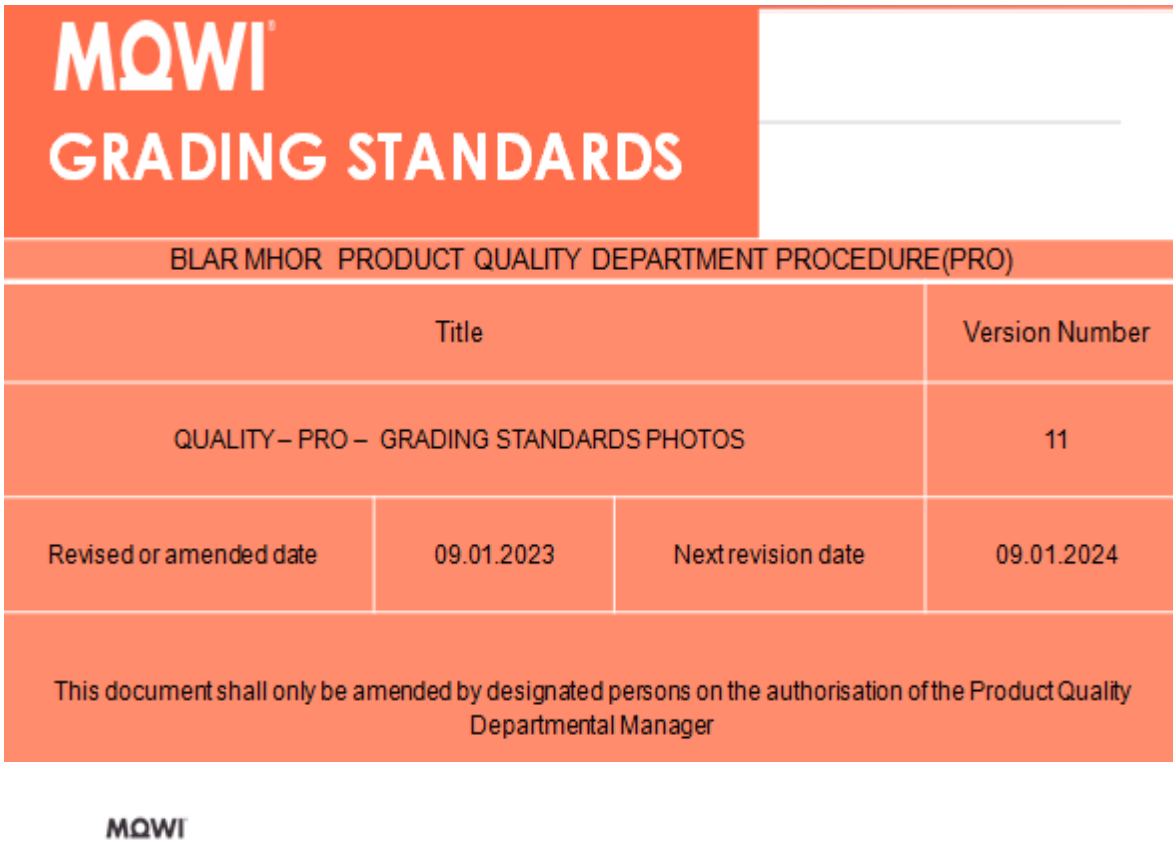
MOWI

Inoculation Damage: Ordinary Uszkodzenia wewnętrzne: Zwykła



Noticeable stain or discolouration >20p piece

The leaked Powerpoint document provides information in English and Polish (it is understood that there is a significant % of the workforce in Fort William who are from Poland):



MOWI

GRADING STANDARDS

BLAR MHOR PRODUCT QUALITY DEPARTMENT PROCEDURE(PRO)			
Title			Version Number
QUALITY – PRO – GRADING STANDARDS PHOTOS			11
Revised or amended date	09.01.2023	Next revision date	09.01.2024
This document shall only be amended by designated persons on the authorisation of the Product Quality Departmental Manager			

MOWI

- Graders should be aware of specific customer specifications. Reference can be made to these via the monitor screens on the production floor. They can also be found in DOL.
- In training reference should also be made specifically to DOL document "Specific Customer Requirements"
- Unclean fish and gutting damage should be highlighted to the Quality Monitor. ASAP

- Osoby sortujące powinny być zaznajomione ze specyficznymi wymaganiami klienta. Można odnieść się do ekranu wyświetlającego wymagania znajdującego się na hali produkcyjnej. Wymagania te można też znaleźć na DOL.
- Podczas szkolenia powinno się też szczególnie uwzględniać dokument DOL: „Szczególne wymagania klienta"
- Nieczysta ryba i uszkodzenia z patroszenia powinno się najszybciej jak to tylko możliwe zgłaszać do Monitora jakości

Download in full via: GUIDE Grading Standards Photos V11

The Sunday Post [reported (11 June 2023)]:

SUNDAY POST
11 Jun 2023

There is something fishy about salmon on offer in the supermarket

Animal welfare campaigners in warning over deformities

By Dawn Thompson
news@sundaypost.com

Animal welfare campaigners have raised concerns over Scottish supermarket salmon after a leaked document showed deformed and sea lice-damaged fish.

A staff grading guide from fish farming giant Mowi includes pictures of salmon with jaw deformities, "abnormal" curvature of the spine and sea lice damage.

Others show fish with exposed skulls after stunning, where they are rendered unconscious immediately before slaughter.

Mowi said the "historical" images represented a worst-case scenario for training and not the health or condition of its fish more widely. However, salmon farming campaigner Don Staniford, who received the leaked document from a whistleblower, described the pictures as "gruesome".

Abigail Penny

He said: "Consumers still buying Scottish salmon should take a close look at the horrific state of the poor fish which end up on their plates. With all the welfare abuse including death crowns, lesions and open wounds plaguing Mowi salmon it is not surprising that whole salmon has been replaced by skinless Scottish salmon.

"The fact that Mowi workers are prepared to leak information, despite the fact they could lose their job for doing so, speaks volumes."

Staniford was passed the document just weeks after his campaign group Scamon Scotland, launched a new whistleblower hotline. Dated January 9 this year, the document was labelled "version 11" and headed "Mowi Grading Standards" at the Blar Mhor processing plant in Fort William, Lochaber. Images of fish include those described as a "mishape" which includes "abnormal, obvious curvature of the spine", and examples of "jaw deformity" classed as "ordinary". Another image of wounds shows "stunner damage where skull visible".

Further photos detail sea lice damage showing "large patches of scattered blood spots".

One picture of injury from sea lice is headed "destroyed fish" while another shows salmon with flesh exposed by skin lesions and how to grade it if the wound is greater than a 50p piece.

Abigail Penny, executive director of Animal Equality UK, said: "These nauseating images give a glimpse into what life is really like for farmed salmon, and it's far from pretty. I dread to imagine the misery these animals endured.

"What is particularly alarming is that the salmon classified as 'ordinary' clearly experienced extreme jaw deformities, red raw lice sores, and wounds so deep that their skulls were visible. Significant health and welfare issues are clearly so commonplace on fish farms that the salmon industry now believes this suffering to be normal, but any consumer will no doubt feel sick to their stomach when they see these repulsive photos."

Industry body Salmon Scotland's website says all Scotland's salmon farmers belong to animal welfare accreditation schemes.

Mowi, formerly Marine Harvest, supplies supermarkets including Tesco, Asda, Ocado and Sainsbury's.

A Mowi spokesperson said: "Our trained fish graders inspect every salmon by hand to ensure top-quality salmon are delivered to customers. The historical images presented in an internal training document represent rare and worst-case examples of fish condition and do not represent the health and welfare status of the population at large.

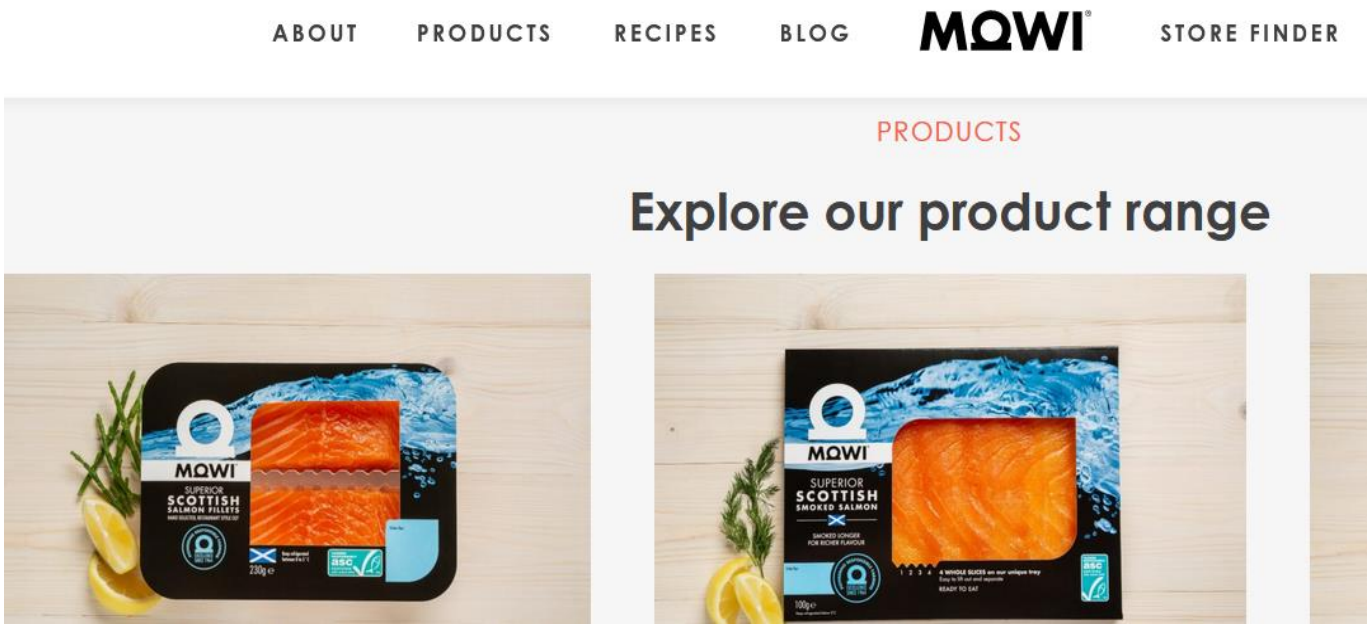
"Our staff take great care to provide for their salmon through every life stage, and work closely with animal welfare organisations to ensure that animal welfare is a top priority."

An RSPCA Assured spokesperson said: "These images are distressing, however, it looks likely to be an internal training document designed to educate staff about how to prevent and manage certain issues that can sadly occur from time to time.

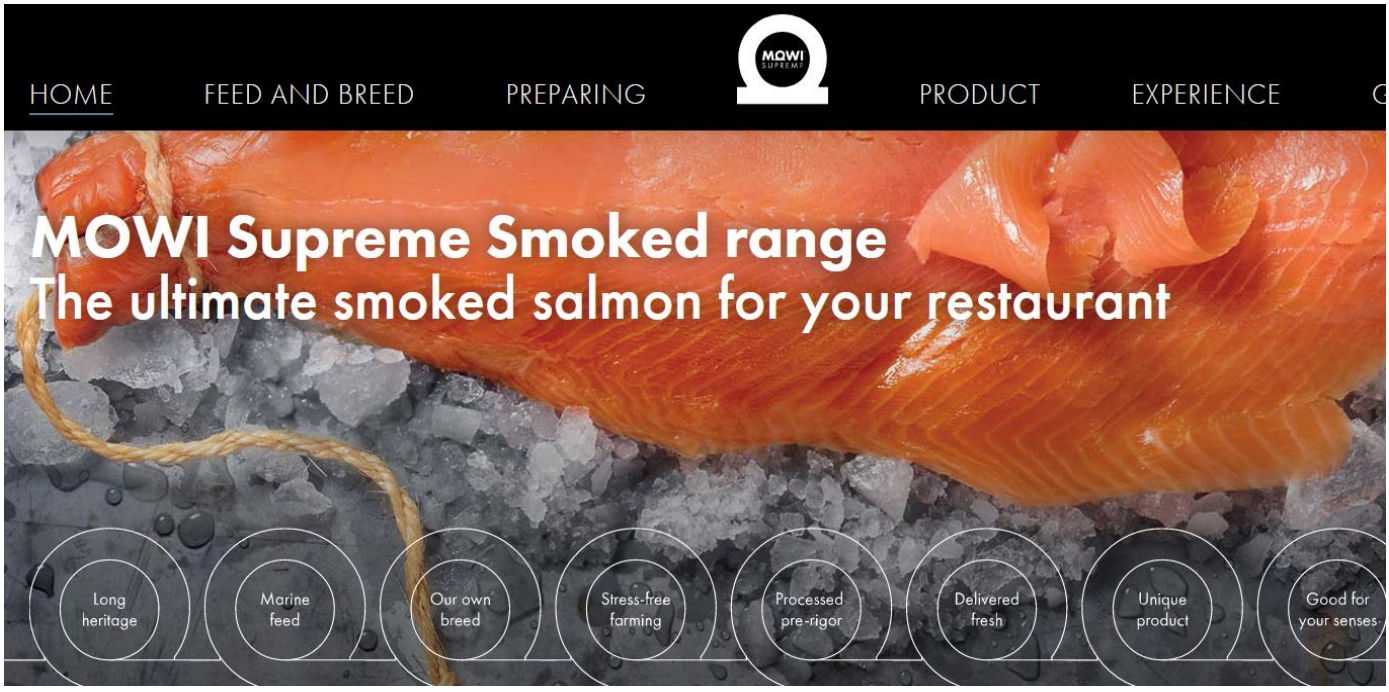
"It is unclear when or where these images were taken, whether they are stock pictures for the purpose of training staff, or whether they have been taken at a processing facility recently but we will look into this matter fully."

A spokesperson from the Scottish Retail Consortium said: "UK retailers are dedicated to sourcing seafood products responsibly and our members regularly review farming practices in their supply chains to ensure they meet the highest standards."

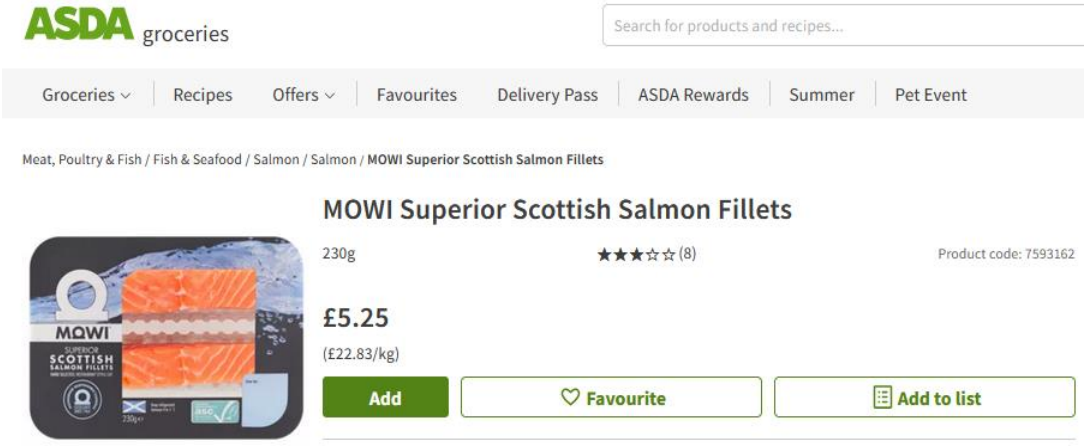
Mowi markets Scottish salmon as ‘superior’:



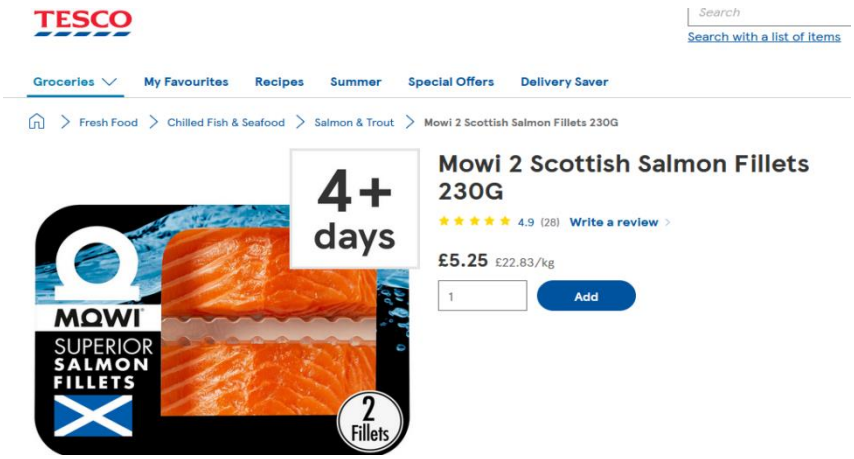
Mowi markets ‘supreme’ salmon for use in restaurants:



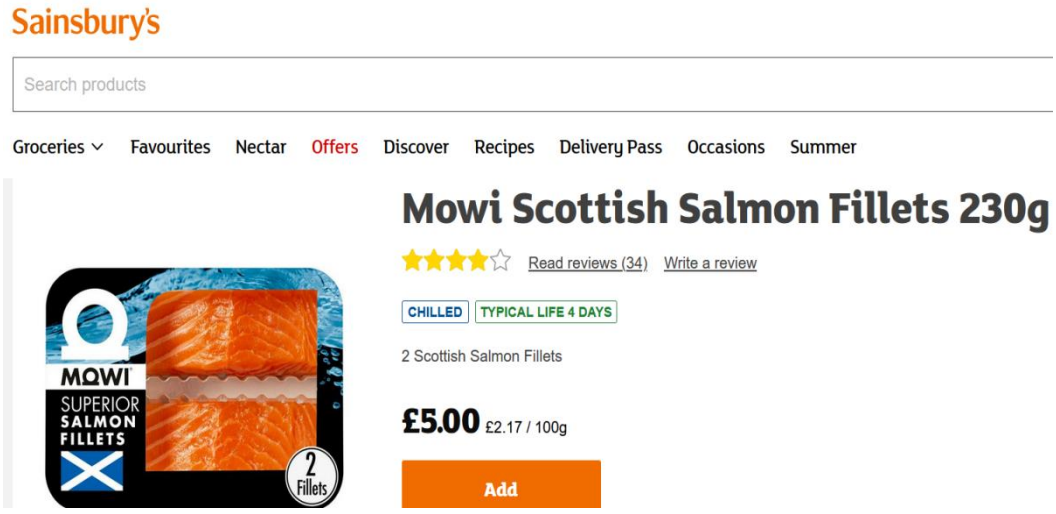
ASDA [sells Mowi 'superior' Scottish salmon fillets]:



Tesco [sells 'superior' Mowi Scottish salmon]:

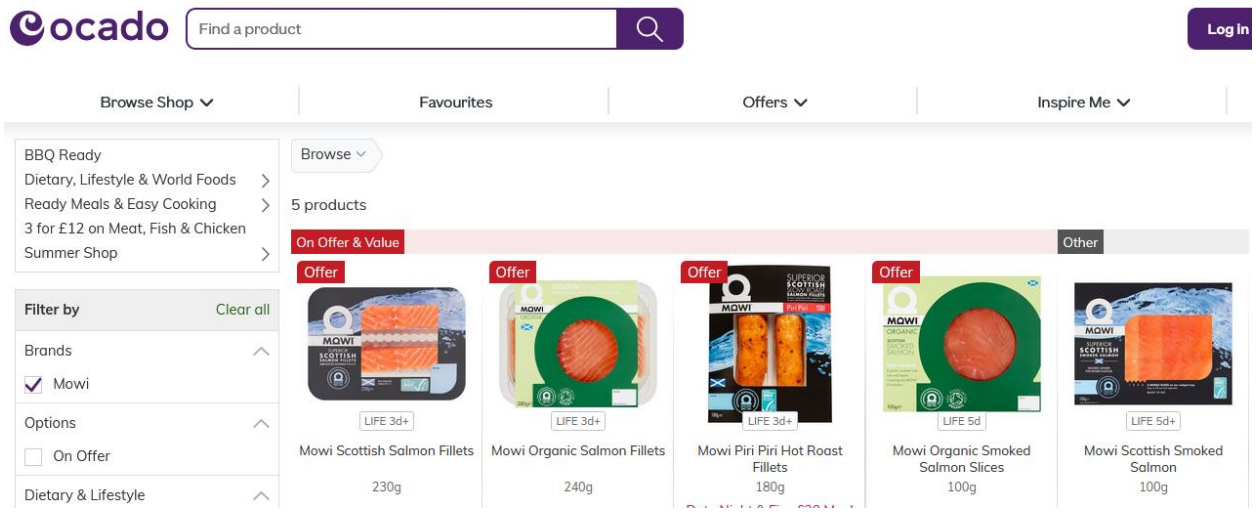


Sainsbury's [sell 'superior' Scottish salmon]:

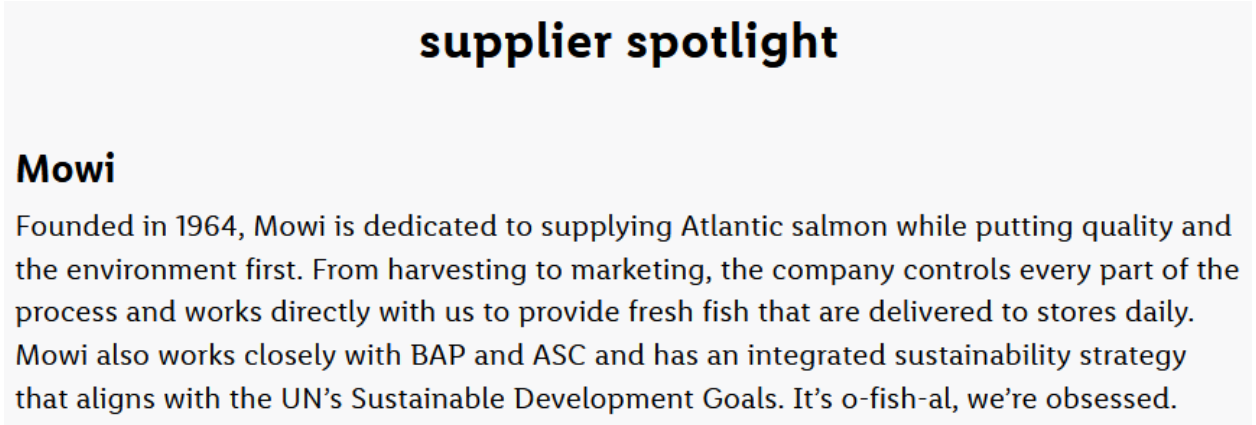


Mowi [sells via Sainsbury's, Tesco, ASDA and Ocado]:

Ocado [market Mowi salmon as 'superior' and 'organic']:



Lidl [sells Mowi salmon]:



Mowi's Scottish salmon is [understood to be 100% RSPCA Assured](#).

"The welfare of our fish is at the centre of everything we do and we are proud that all of our farms in Scotland are RSPCA Assured and are farmed responsibly in the pristine, strong tidal waters of the west coast of Scotland," [reports Seafood Scotland](#).

IntraFish Latest News Salmon Whitefish Shrimp Aquaculture Fisheries Markets IntraFish.i

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'The best of what we do': Mowi's branded UK rollout hits as salmon retail sales soar

Fresh salmon spend in the UK has jumped 16 percent in the last two years, with online sales in particular taking a much larger chunk of trade.

13 April 2021 5:19 GMT *UPDATED 13 April 2021 12:09 GMT*

By **Dominic Welling**

Salmon farming giant Mowi's launch of its premium consumer brand in UK retailers last month is a "natural progression" for the company at a time when salmon sales in the UK are booming.

Mowi is debuting the branded products starting with exclusive listings in Sainsbury's, but the intention is to roll out the range further into other major retailers and online platforms over the course of the year, James Cowan, head of sales for Mowi Consumer Products, told **IntraFish**.

The products are processed and packed at Mowi's Rosyth plant in Scotland, which also does the private label salmon business for Sainsbury's, and the items are currently available in several hundred stores across the UK.

The product is 100 percent Scottish salmon and Royal Society for the Prevention of Cruelty to Animals (RSPCA) certified.

On top of its many years farming in Scotland, Mowi has been processing for more than six years now in the UK "so it's a natural progression for the site," Cowan said.

"We've established ourselves as a very competent private label producer doing work for Sainsbury's, Aldi and Lidl and also for the foodservice industry.

"So we've proved ourselves as multi-disciplined and high quality, and now been able to add our own brand to that," he said.

RELATED NEWS

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Salmon
9 April 2021 13:25 GMT

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Markets
8 April 2021 9:31 GMT

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Finance
7 April 2021 12:05 GMT

Smoked salmon suppliers jockey for business as cruise line operators chase summer reopening
Read more

“Consumers still buying Scottish salmon should take a close look at the horrific state of the poor fish which ends up on their plates,” said Don Staniford, Director of $camon $cotland. “With all the welfare abuse including death crowns, lesions and open wounds plaguing Mowi salmon it is not surprising that whole salmon has been replaced by skinless Scottish salmon. Supermarkets are shamefully greenwashing Mowi salmon as ‘responsibly sourced’ and ‘welfare friendly’ via RSPCA Assured, the Soil Association and the Aquaculture Stewardship Council.”

“The fact that Mowi workers – gagged via Non-Disclosure Agreements and the threat of losing their jobs – are still prepared to leak information speaks volumes,” continued Staniford. “The camera never lies unlike Mowi. Please boycott RSPCA Assured Mowi salmon – avoid Scottish salmon like the proverbial plague. Mowi is the Monsanto and McDonalds of the seas.”

Abigail Penny, Executive Director of Animal Equality UK, said: “These nauseating images give a glimpse into what life is really like for farmed salmon, and it’s far from pretty. I dread to imagine the misery these animals endured. What is particularly alarming is that the salmon classified as ‘ordinary’ clearly experienced extreme jaw deformities, red raw lice sores, and wounds so deep that their skulls were visible. Significant health and welfare issues are clearly so commonplace on fish farms that the salmon industry now believes this suffering to be normal, but any consumer will no doubt feel sick to their stomach when they see these repulsive photos. We cannot buy into the industry’s lies. We must take a stand and stop supporting this ruthless industry before millions more salmon succumb to the same sad fate.”

In 2018, Scottish Salmon Watch obtained more than 300 graphic photos of Scottish salmon via Freedom of Information taken by the Scottish Government's Fish Health Inspectorate during site visits to salmon farms. The photos – which included many salmon farmed by Marine Harvest (renamed Mowi in 2019 due to what their CEO admitted was 'negative consumer perception') were published by The Ferret in June 2018.

Fish Farm: Raineach, East Loch Tarbert, Harris

Company: Marine Harvest
Problems: amoebic gill disease, lice
Fish heath inspection: five fish sampled on 4 October 2016
Case number: 2016-0449

The Ferret

Fish Farm: Groatay, Sound of Harris

Company: Marine Harvest
Problems: unknown
Fish heath inspection: unknown (report due July 2018)
Case number: 2018-0111

The Ferret

In August 2018, The Ferret reported that the Scottish Salmon Company (renamed Bakkafrost Scotland in June 2022) and Scottish Sea Farms (Norskott Havbruk) deployed lawyers in a bid to prevent Scottish ministers from releasing photos of diseased and lice-infested fish under freedom of information law. "This exposes Scottish Sea Farms to reputational damage which would have an adverse impact on our legitimate economic interest," said lawyers acting for Scottish Sea Farms.

In October 2019, Scottish Salmon Watch revealed (again via a Freedom of Information disclosure from the Scottish Government) how Marine Harvest (Mowi) had lobbied against the disclosure of damning photos in a letter to the Scottish Government in July 2018:

marineharvest

6th July 2018

Dear [redacted]
Marine Scotland - Science

Dear [redacted]

I am writing as follow up to the FOI request by Mr. [redacted] and the release of materials to the individual on June 15, 2018, by Marine Scotland (MS). Your justification for releasing photos of dead or euthanized salmon taken by MS staff during a scheduled fish health surveillance visit at various salmon farm locations can be summarised as: *"The public interest in disclosure is outweighed by the public interest in upholding [the materials requested]."*

As expected, the materials and the contextual statements provided by MS were forwarded as an "exclusive" to one online media outlet, *The Ferret*, receiving the headline "Horror photos of farmed salmon spark legal threat". The social media comments following the story urged that consumers "*Don't buy farmed fish*" and that the photos "*Put you off eating salmon*". As you are aware, it is rare that today's reader delves below the shock and horror headlines.

I feel that these two statements communicated via social media are the best examples of why public interest is not well-served by releasing these photos to a member of the public not familiar with salmon, farming, or salmon health. More to the point: the risk of people turning away from a healthy food such as salmon as a reaction to irresponsible use of photos for the sole purpose of creating fear in the consumer, is a risk to public health. The benefits of eating oily fish like salmon are well documented, as are the concerns to one's health by not including fish in their weekly diet plan.

I ask you to consider this position for future FOI requests that may create unnecessary confusion or fear about consuming healthy Scottish seafood.

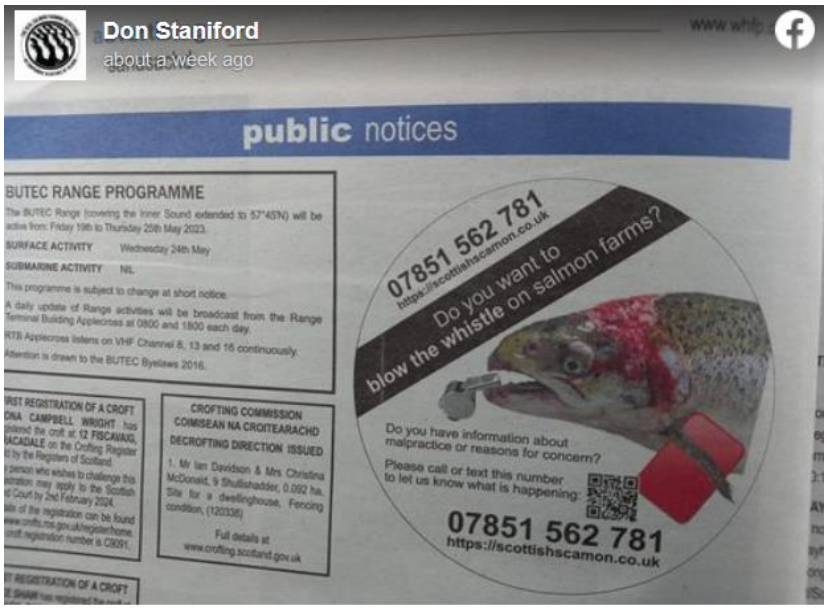
In January 2020, Scottish Salmon Watch published a dossier of photos of diseased and deformed Scottish salmon (sourced from Freedom of Information disclosures, secret filming inside salmon farms and whistleblowers working on salmon farms):

In November 2022, $camon $cotland published more gruesome photos of RSPCA Assured Mowi salmon (sourced from the Scottish Government's Fish Health Inspectorate):

In August 2022, [$camon $cotland published a photo] (sourced from the Scottish Government's Fish Health Inspectorate) of a salmon farmed by Mowi with most of its nose missing:

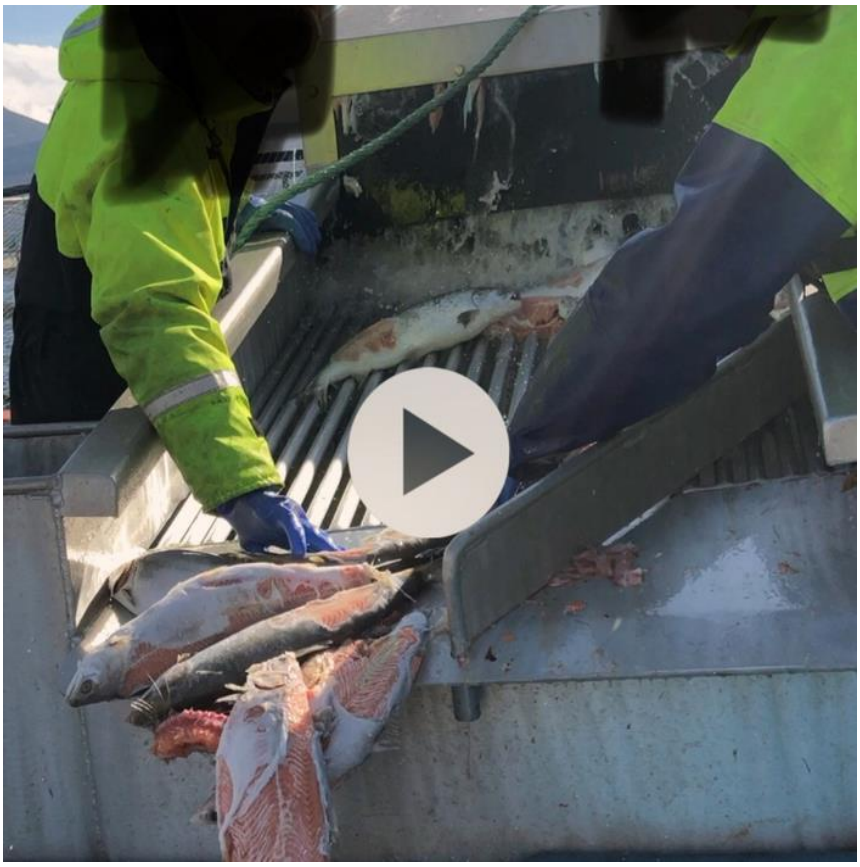
In April 2020, Scottish Salmon Watch [published shocking photographic evidence of welfare abuse at RSPCA Assured Mowi in the Isle of Lewis]:

One of the photos of Mowi's RSPCA Assured Scottish salmon published by the Scottish Government's Fish Health Inspectorate in 2020 was used in $camon $cotland's whistleblower campaigned launched in May 2023:



Our whistle-blower advert in this week's West Highland Free Press will probably attract lots of drunken and abusive phone calls this weekend!

Back in 2018, a whistleblower working at Mowi's Carradale salmon farm in Kilbrannan Sound was so horrified at the levels of mass mortalities (300,000 salmon died) that he leaked photos:



In October 2021, a [Mowi worker leaked photos of disease problems] at a salmon farm at SW Shuna in the Sound of Jura:

Secret filming inside Mowi salmon farms around the Isle of Shuna in July 2021 [exposed horrific lice infestation, mortalities and welfare abuse]:


20

Revealed, the nauseating underbelly of Scotland's £1 billion salmon farms

By Georgia Edkins

SCOTLAND's largest salmon producer is being probed by police and animal welfare authorities after undercover cameras captured sickening footage from its fish farms.

Fish infested with lice are seen swimming through filthy water just hours before being harvested and processed for sale in supermarkets up and down the country.

One section of footage – taken at four Mowi fish farm sites on the West Coast last week – shows a dead salmon floating to the top of the water, its flesh coming loose as it decomposed.

Now The Scottish Mail on Sunday can reveal the farms are being probed by the RSPCA.

If investigators find salmon in the same state of distress, Mowi could lose its 'RSPCA Assured' labelling, which guarantees consumers the fish is reared in line with the highest welfare standards. The Norwegian company could even face

'The RSPCA should hang their heads in shame'

Fish eaten alive by lice, cages awash with faeces, dead salmon left to rot. As No1 producer is probed by cops, what are you putting on YOUR plate?

DISEASED: A lice-ridden salmon in a Scottish Mowi fish farm this month

sometimes administered with their feed in a desperate attempt to stave off disease.

limit their portions to one fillet every two months.

In 2020, after 20 tons of salmon

growing from open wounds, and chunks of their flesh missing.

A report said animals were 'held

take those responsible for this suffering before a court of law.'

An RSPCA Assured spokeswoman

Netflix's 'Seaspiracy' – which premiered in March 2021 – [features video footage of mass mortalities and disease ridden Mowi salmon at an RSPCA Assured and ASC-certified salmon farm at Gorsten in Loch Linnhe]:

A report – 'RSPCA Welfare Standards for Farmed Atlantic Salmon' - published by the RSPCA in February 2021 included:

Appendix 1

Part C: Development of a programme for monitoring physical injury and deformity

Introduction

Regular monitoring of fish for signs of physical damage or deformity is an important part of management so that welfare problems do not go undetected. However, it can be difficult to observe individual fish clearly due to the large number of animals and the size of enclosures. Whenever husbandry procedures allow closer proximity to fish, the opportunity should be taken for more detailed observation. In addition there should be detailed monitoring of fish health at slaughter where careful examinations of individuals for disease, injury and deformity can be made.

The RSPCA welfare standards require that there is no recurring physical damage occurring on fish attributable to features of their environment, husbandry procedures or unrecognised disease challenge. Incidence of physical damage must be regularly monitored at slaughter according to a programme specified in the VHWP (see Part A for more details). This programme must include keeping records to show that physical health scoring has been regularly conducted on a sample of fish at slaughter. The records must also give details of the levels of physical damage observed during monitoring, for example, the percentage of fish with fin damage, de-scaling, wounds etc. Records should be discussed with the veterinary surgeon, and the VHWP must be regularly updated to identify and rectify the causes of any physical health problems that become evident during monitoring.

There follows a guide for a possible monitoring programme which could be used at slaughter. Examples are given of the types of condition which should be monitored. The proportion of fish affected should be recorded. Some photographic scales (see pages 77 to 78) are also presented to demonstrate how the severity of some types of damage could be assessed.

Possible monitoring programme

The conditions which are to be monitored must be specified in the VHWP. It is suggested these include:

- eye damage/loss
- snout injuries
- fin damage (dorsal, pectoral, pelvic, tail)
- deformities (jaw, operculum, spine)
- scale/skin damage (due to abrasion, sea lice etc).

Examples are given below of scales that could be used to record the severity of the condition for each fish assessed. Each fish is given a score of 0, 1 or 2 for each condition. Score 0 indicates the fish is completely normal, Score 1 is used for fish that are mildly affected, Score 2 is used for severely affected fish.

Photographic scales are also given to suggest examples of different scores. These photographs illustrate the type of damage which may be seen, but are not intended to be exhaustive. For some conditions, the severity, age, and extent of damage can vary considerably. Scoring will be somewhat subjective. The important factor is for the person assessing fish to be consistent when scoring in order to be able to monitor any changes in damage levels.

When drawing up a monitoring programme there should be an initial trial of the scoring system, with a sample of fish being removed from the slaughter line after killing and transferred to an examination bench. The process is easier if two people are involved. Each of the conditions should be carefully examined on each fish, by one observer, and a score assigned.

Once a method of using the scales has been established and scoring can be conducted consistently, assessments can be started on a random sample of fish. A recorder should stand behind the assessor and write down the scores as they were called out. A random sample of 150 fish on the slaughter line should be assessed (trials have shown approximately 150 fish can be assessed in one hour by an experienced team).

Use of the scales in the RSPCA Assured scheme

The results from this assessment should be used to identify areas where welfare can be improved on the farm, by identifying causes of physical damage and taking action to rectify the situation. Records of physical damage scale assessment must be kept and made available to the RSPCA Assured Assessor and RSPCA Farm Livestock Officer, along with details of any action taken as a result of the assessment. It is expected that the VHWP will be regularly updated, in consultation with the veterinary surgeon, to reflect the results of the physical damage scoring assessment.

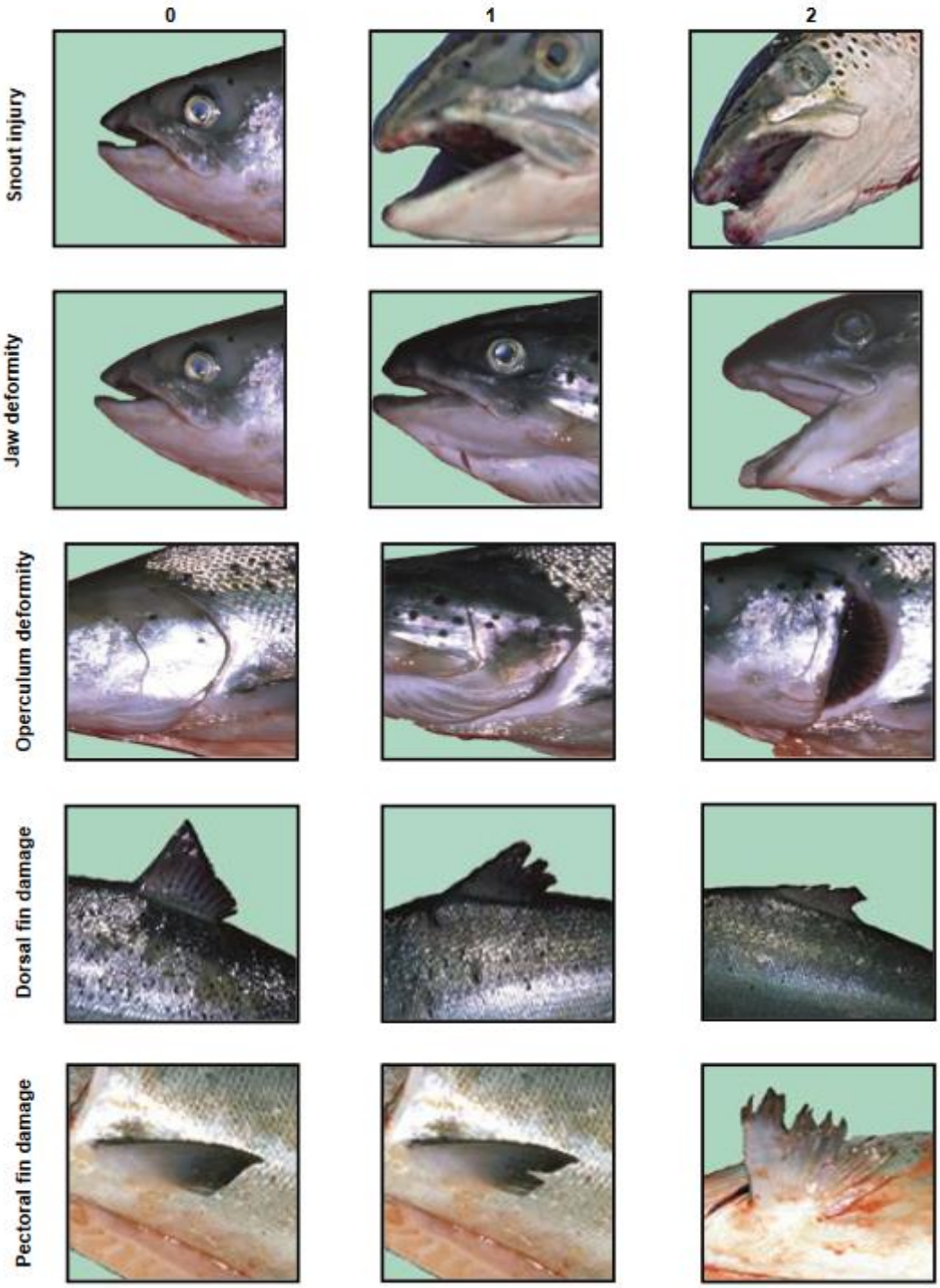
Suggested scoring system

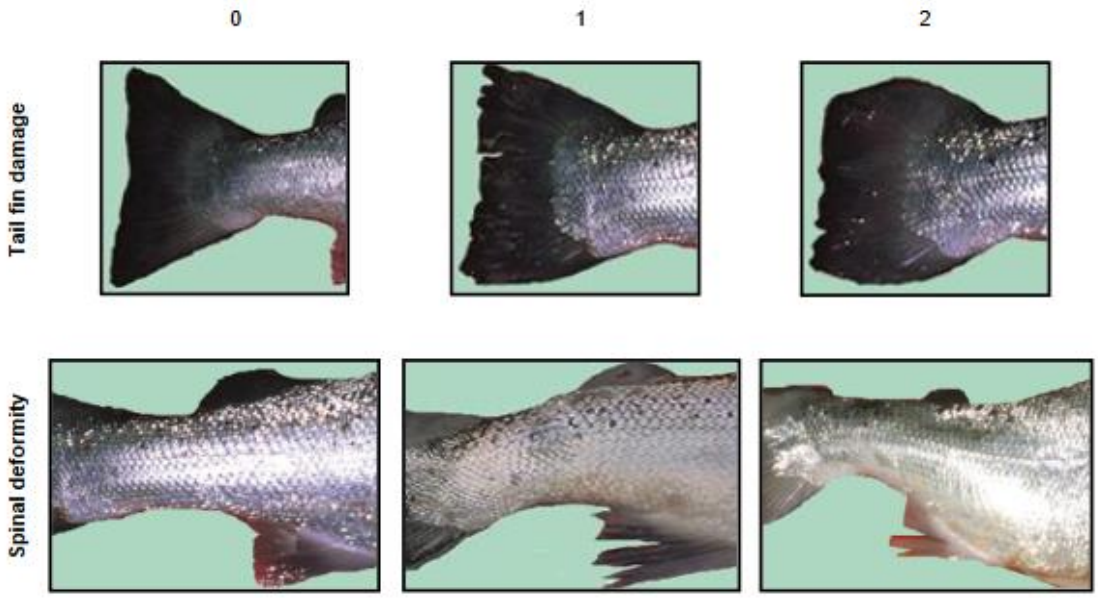
The table below shows the score given to a fish for each condition depending on the severity of damage.

Type and level of damage	Score given to fish 0	1	2	Also note:
Eye loss/damage	None	One eye	Both eyes	Type of damage
Snout injury	None	Mild	Severe	
Jaw deformity	None	Mild	Severe	
Operculum deformity	None	Mild	Severe and/or both sides	
Dorsal fin damage. Type and level of damage	None	Mild	Severe	
Pectoral fin damage	None	Mild	Severe and/or both sides	
Tail fin damage	None	Mild	Severe	
Spine deformity	None	Mild	Severe	
Scale loss/skin damage	None	< 10% each side and superficial	> 10% each side and/or deep skin damage	
Sea lice damage	None	Mild	Severe	

Photographic examples for scoring

Suggested examples of normal, mild and severe for conditions classified in this way (note: eye loss/damage and scale loss have a different classification and no examples are given).





These photographs are part of a larger set of photographic scales which have been developed by the University of Bristol for use during on-farm assessment of farmed fish welfare. The copyright for these images belongs to the University of Bristol.

Read more via: [RSPCA Sponsored Welfare Abuse of Salmon Farms - A Guide to Getting Away with Mass Murder (Theriocide)!]

Another leaked document – [‘Standard Operating Procedure: Processing – Grading’] - includes:

BLAR MHOR PROCESSING DEPARTMENT
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
PROCESSING - SOP – GRADING			9
Revised or amended date	30.01.2023	Next revision date	30.01.2024
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To ensure all fish are correctly graded for quality based on MOWI and Customer Specific Grading Standards

Responsibility: Processing Manager, Processing Line Managers, Factory Operatives

Health and Safety: Risk Assessment PROCESSING – SOP - GRADING, Location of Emergency stop buttons

References: QUALITY – GUIDE - GRADING STANDARDS(PHOTOS),
QUALITY – PRO - GRADING STANDARDS (WRITTEN)
QUALITY – PRO - QUALITY CHECKS POST EVISCERATION
QUALITY – PRO - SPECIAL CUSTOMER REQUIREMENTS PROCEDURE
PROCESSING – OPP - TEMPERATURE CONTROL PROCEDURE

Job Requirements:

Fish are delivered to the Grading platform and automatically diverted to individual stations to be graded by visual assessment to MOWI Quality Standards.

- The operative must check each fish both internally and externally to determine which standard the fish meets
- If necessary a final clean with a suction tool can be carried out if required at this stag

Grading Station

- The quality decision is applied by the operator selecting from a control panel with pre-programmed criteria.

The control panel consists of a fish delivery switch, four selection buttons and an emergency stop button:

A. Fish Delivery switch

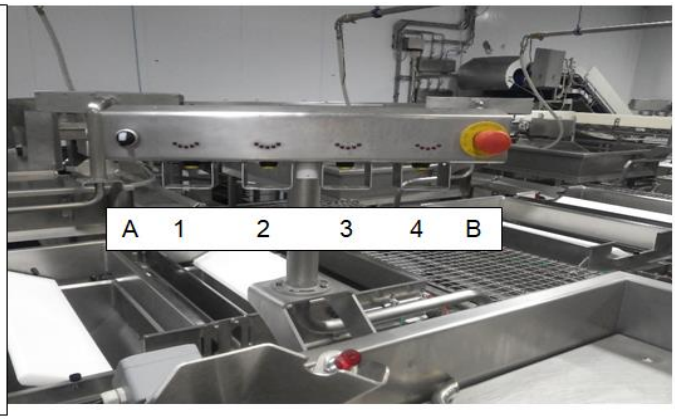
1. Ordinary Standard button

2. Rebate Standard button

3. 3rd Button

4. Reject fish button

B. Emergency Stop button



- After the fish has been quality assessed and prior to the fish being dropped into a weigh cell, the operator will select the appropriate button
- If the fish meets the Superior Grading Standard, no button selection is required
- Once the fish has been deposited in the weigh cell the grader will automatically weigh the fish and then drop it to a pre-selected bucket

Grading Standards and Customer requirements

There are aspects of Grading training which cannot always be fully covered by the initial practical on the job training, this is due to some of the categories to be assessed being more prevalent at different times during the year, therefore Graders will undergo initial practical job training with an experienced designated processing trainer until deemed competent by Processing line management.

During their initial practical training they will also undergo instruction by a Quality Monitor on the MOWI Grading Standards both photographic and written and on Special Customer requirements. Quality Monitors will assess each graders understanding of the grading standards and requirements and sign off only if deemed competent.

ASPECT OF JOB	ACADEMY Document Reference
Special customer requirements	QUALITY – PRO - SPECIAL CUSTOMER REQUIREMENTS PROCEDURE
Photographic grading standards	QUALITY – GUIDE - GRADING STANDARDS(PHOTOS),
Written grading standards	QUALITY – PRO - GRADING STANDARDS (WRITTEN)

Instruction to graders from Quality monitors will be ongoing as different categories of the standards become more prevalent or issues with perception of standards are encountered.

A review of Graders understanding of the MOWI Grading Standards and Customer requirements will be undertaken at least annually by the Product Quality Department

Another leaked document – [‘Standard Operating Procedure: Processing – Hand Gutting’] - includes:

BLAR MHOR PROCESSING DEPARTMENT STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
PROCESSING - SOP – HAND GUTTING			10
Revised or amended date	10.01.2023	Next revision date	10.01.2024
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To ensure correct gutting and cleaning of fish to MH Standard
Responsibility: Processing Manager, Processing Line Managers, Factory Operatives
Health and Safety: Knife Handling Training, Risk Assessment PROCESSING – SOP - HAND GUTTING
References: PROCESSING – OPP - TEMPERATURE CONTROL PROCEDURE QUALITY – PRO - QUALITY CHECKS POST EVISCERATION

ROZCINANIE

- Trzymając rybę za ogon umieść nóż w odbycie, a następnie pociągając rybę do siebie jednocześnie przesuwaj nóż od siebie.

- Rozcięcie powinno sięgać od odbytu, przez środek brzucha jedną, prostą linią, aż do skrzeli.

- Proste rozcięcie jest bardzo istotne – krzywe cięcie może obniżać klasę ryby.

Job Requirements:

The hand gutting of fish is a staged process which involves the splitting, gut removal, kidney removal, back boning and spooning or suction cleaning to achieve a gutting and cleaning standard which allows the fish to be to be further processed.

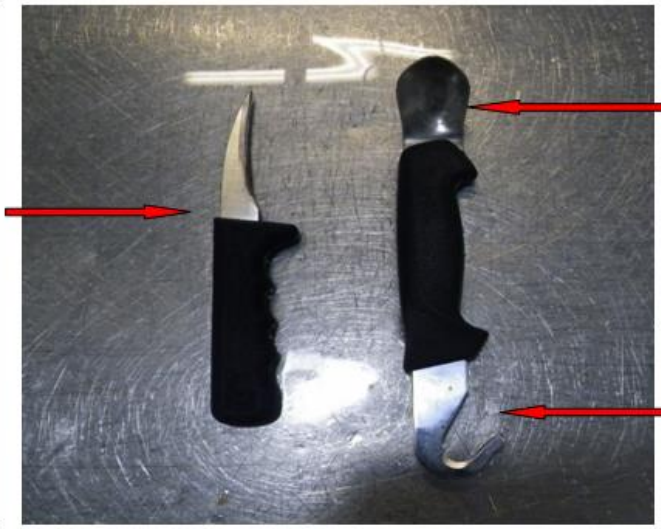
All personnel trained in this document will be trained in MOWI quality gutting standards
QUALITY – PRO - QUALITY CHECKS POST EVISCERATION

HAND GUTTING TOOLS

Knife

Used for:

Splitting
Gut Removal
Kidney removal



Spoon
Used for:

Spoon Section

Kidney Removal

Fish clean

Hook Section
Used for:

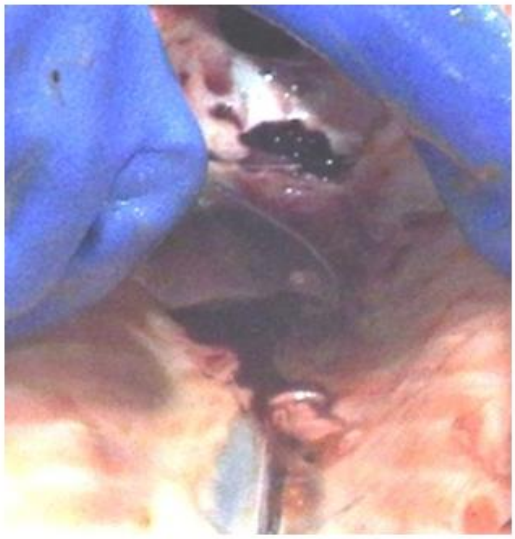
Back boning

- Kidney removal may also be done with the aid of a suction hose as detailed in PROCESSING – SOP - SUCTION CLEANING

- Kidney removal can then be done by either the use of a suction tool or by scrapping away the kidney from head to tail using the spoon.

Suction tool

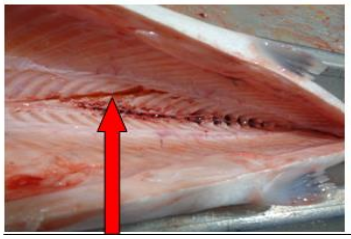
Spoon



- Damage caused by the hand gutting process could either downgrade the quality or could incur yield loss to a further process.

Damage

Squint Cut
Could incur yield loss during further processing
Caused by poor quality splitting of the fish
Caused by poor knife control



Another leaked document – [‘Standard Operating Procedure: Harvest Bin Preparation’] – includes:

BLAR MHOR OPERATIONS STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
OPERATIONS-SOP-YARD-HARVEST BIN PREPARATION			8
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To ensure that all bins and lids are in a clean condition and free from damage. Aby upewnić się, że wszystkie pojemniki oraz pokrywki są czyste oraz nie posiadają żadnych uszkodzeń.
Responsibility: Yard Staff Pracownicy yardu Yard Supervisor Kierownik yardu
Health and Safety: Risk Assessment RA Ocena Ryzyka RA
References: Packaging Storage Harvest Bin Cleaning and Storage Preparation of Disinfectant 2% Solution

Approved Chemicals Used & Dilution				Equipment	Comments
Product	**Use/Dosage %**	**Symbol**	**Hazard**		
Steriklenz 5	2%	DISINFECTANT	IRRITANT	**Pressure Washer**	**Used to spray required surfaces.** Używac do spryskiwania wymaganych powierzchni. **Used to sanitizing recirculation system.**

PPE Required

- Remove lid from the bin.
  Zdejmij pokrywkę z pojemnika.

- All bin and lid surfaces must be thoroughly disinfected using a pressure washer and approved disinfectant. Disinfectant must be prepared as described in SOP- Preparation of disinfectant 2% solution.
  Używając spryskiwacza zdezynfekuj dokładnie wszystkie powierzchnie pojemnika oraz pokrywki. Dezynfektant przygotuj tak jak opisano w instrukcji pracy SOP- "Preparation of disinfectant 2% solution".

- Once clean, two white harvest bin liners should then fitted within the bin and stretched over the sides. Make sure that the liners not touch the floor. Always use clean gloves.

Another leaked document – ‘Standard Operating Procedure: Yard Harvest Bins Cleaning & Storage’ – includes:

BLAR MHOR OPERATIONS STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
OPERATIONS-SOP-YARD-HARVEST BINS CLEANING AND STORAGE			8
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To maintain harvest bins in a clean and hygienic condition.
W celu zapewnienia odpowiedniej czystosci binow.

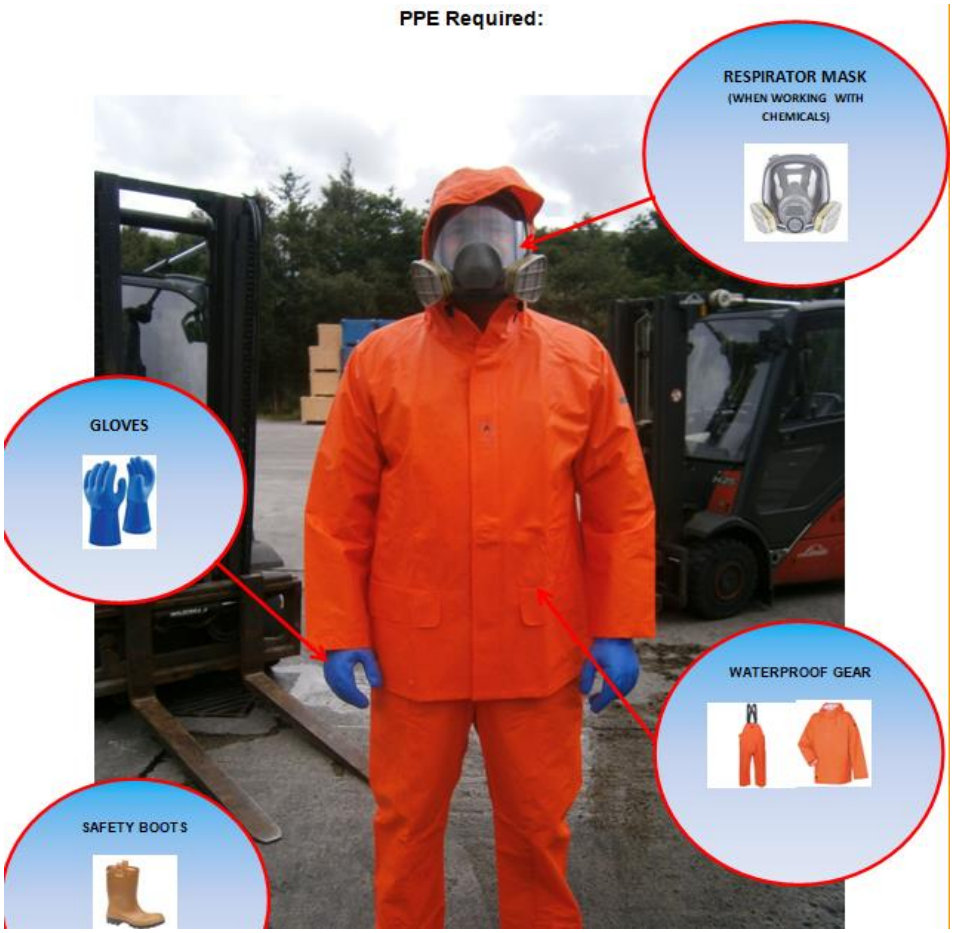
Responsibility: Yard Operatives / Supervisor
Pracownik Yardu / Kierownik

Health and Safety: Risk Assessment RA
Ocena Ryzyka RA

References: Operation High Pressure Washer
Harvest Bins Cleaning Schedule
Yard Chemical in Use
Yard Soak Bin Preparation
Yard Preparation of Disinfectant 2% Solution

Approved Chemicals Used & Dilution				Equipment	Comments
Product	Use/Dosage %	Symbol	Hazard		
SUPERKLENZ	5%			Soak bin	Used to soak plastic plugs .
CHLOROFOAM	4-6%			Dema Foamer	Used for main clean.
STERIKLENZ 5	2%			Soak bin, pressure sprayer	Used for disinfection of cleaned equipment.

PPE Required:



- Unscrew plastic plugs located in the bottom of the bin ,next put them in to the designated soak bin with 5 % solution of approved chemicals.
  Odkrec plastikowe zatyczki znajdujace sie na dole pojemnika, zamocz je w pojemniku z 5% roztworem zatwierdzonych chemikali.

- **Pre-clean Gross Debris Removal.** Using a power washer lance, wash thoroughly both sides of the lid then place it on the clean plastic pallet. Next, wash all external sides of the bin working from the top to the bottom. Once finished, place the bin on the clean plastic pallet on its side. Wash bottom of the bin then clean thoroughly all internal surfaces. Pay particular attention to the corners and threaded holes

- **Main Clean Detergent Application.** Using the air foamer, apply foam detergent working from the bottom to the top on both sides of the lid and on all external and internal bin surfaces. Ensure that all surfaces are fully covered by foam and left for the recommended contact time. If necessary use a green pad for additional cleaning.
  Czyszczenie przy pomocy detrgentu. Przy uzyciu spieniacza nanies detergent z dolu do gory na obydwie strony pokrywki oraz na wszystkie zewnetrzne oraz wewnetrzne powierzchnie pojemnika. Upewnij sie ze czyszone powierzchnie sa calkowicie pokryte piana oraz ze pozostaja w kontakcie przez rekomendowany czas kontaktu.




STORAGE:

Using a fork-lift truck carefully stack clean bins in the designated area in the yard. Harvest bins may be stacked up to 4 levels high. Extra care must be taken whilst stacking. Never stack bins unless the lid has not been closed and secured with elastic bands.
Przy pomocy wozka widlowego ustaw pojemniki w wyznaczonej do tego strefie. Pojemniki moga byc ustawiwane na wysokosc czterech pieter. Nigdy nieodstawiaj pojemnikow jezeli pokrywka niezostala odpowiednio zabezpieczina za pomoca elastycznych opasek.

Another leaked document - 'Operational Procedure: Effluent Plant Chemical in Use' - details chemical use in the effluent plant at Blar Mhor in Fort William:

BLAR MHOR OPERATIONS
OPERATIONAL PROCEDURE (OPP)

Title			Version Number
OPERATIONS-OPP-EFFLUENT PLANT CHEMICAL IN USE			1
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To detail all cleaning chemicals currently permitted to be used within the effluent plant

Responsibility: Operations Manager, Operations Line Management, Effluent Plant Operators operatives

Health and Safety: Chemical Handling training

References: PRO-CHEMICAL CONTROL

Product name:	Type:	Use/ dosage%	Recommended contact time	Application and sampling method
ANTIFOAM FDP	Defoamer for Industrial applications. Defomer for food and drink applications.	1-2 l/h	N/A	Pump Dosing
AROMA LIQUID	Perfumes, fragrances	1-10%	N/A	Power washer dosing pump. Deodorising Scrubber. Diluting in Designated Bin
FERRIC CHLORIDE SOLUTION	Coagulant and flocculant.	12-28 l/h	N/A	Pump dosing into the effluent treatment plant.
SODIUM HYDROXIDE 30-40%	Neutralizer	12-22l/h	N/A	Pump dosing into the effluent treatment plant.
SODIUM HYPOCHLORITE 5-14%		10-15l/h	N/A	Pump dosing into the effluent treatment plant.
FORMIC ACID 85%	To keep low ph in product (VISCERA)	300l/26T tanker	N/A	Pump dosing into the road tanker
FORMIC ACID 85%	To keep low ph in product (SCREED OFF MATERIALS))	As needed.	N/A	Pump dosing into the storage tank

Another leaked document – [‘Standard Operating Procedures: Harvesting-On Site Harvest Procedure’] - includes:

BLAR MHOR OPERATIONS STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
OPERATIONS-SOP - HARVESTING-ON SITE HARVEST PROCEDURE			9
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To ensure all fish are harvested in accordance to Mowi and RSPCA Welfare Standards For farmed Atlantic Salmon Celem instrukcji jest zapewnienie wysokich standardow polawianej ryby, zgodnie ze standardami Mowi oraz RSPCA Welfare Standards For farmed Atlantic Salmon
Responsibility: Al staff and On Site Harvest Supervisor. Wszyscy pracownicy oraz kierownik zespolu.
Health and Safety: Risk Assessment- Working Over Water Ocena Ryzyka Praca na wodzie Risk Assessment SOP- On site harvest procedure Ocena Ryzyka SOP- “On site harvest procedure Appropriate PPE to be worn Należy stosowac adekwatne ubranie ochronne
References: RSPCA Welfare Standards For farmed Atlantic Salmon Standardy RSPCA dla hodowlanego łososia atlantyckiego

PERSONAL PROTECTIVE EQUIPMENT

ODZIEZ OCHRONNA

Personal protective equipment is to be used at all times and will vary according to specific tasks.
Osobista odziez ochronna musi byc uzywana podczas wykonywania pracy i moze sie roznic w zaleznosci od wykonywanej pracy.

On shore: High visibility clothing and protective footwear,gloves (blue colour), protective headweare.
Praca na ladzie: Odziez odblaskowa,obuwie ochronne,rekawice (kolor niebieski),kask.

Off shore: In accordance with Risk Assesment ‘Workin over water’,gloves (blue colour).
Praca na wodzie: Odziez odblaskowa,obuwie ochronne, kaski, kamizelki ratunkowe,rekawice (kolor niebieski).

Slaughter: Waterproof clothing, gloves (orange colour), ear defenders, optional eye protection, hair net.
Uboj: Odziez wodoodporna,rekawice (kolor pomaranczowy), ochrona sluchu,w razie potrzeby okulary ochronne, siatka na glowe

8. Sea Crane Operations.

Dzwig morski.

The blue shark hose and funnel is then to be lowered into the fish pen with the Sea Crane (operators must be qualified to use the Sea Crane).

Za pomoca dzwigu umiesc lej oraz niebieska rure w klatce z ryba.

The shark hose and funnel once submerged must then be secured in position.

Po umieszczeniu leja oraz rury zabezpiecz je odpowiednia za pomoca lin.

9. Fish Crowding

Gromadzenie ryb

This must be done in accordance with RSPCA Welfare Standards For farmed Atlantic Salmon

Czynnosc ta musi byc wykonana zgodnie ze standartami RSPCA dla hodowlanego łososia atlantyckiego

10. Fish Escape Valve

Zawor

The fish escape valve is to be used when are any problems during the harvest so that any fish in the pipeline can be returned to the mobile pen.

Zawor uzywany jest do przetransferowania ryby z rur do klatki w razie pojawienia sie problemow w trakcie polowu.

11. Fish Pump

Pompa

First ensure the submersible pump has been lowered into the water.
Upwewnij sie ze pompa zanurzeniowa jest umieszczona w wodzie.

Eensure the Fish Escape valve is closed, only then can the fish pump be switched on.
Upewnij sie ze zawor do uwolnienia ryby jest zamkniety, nastepnie wlacz pompe.

Once the fish has been correctly crowded they can be pumped to the killing station after. ensuring the Fish Escape valve is closed.
Po prawidlowym wyciagnieciu sieci ryba moze byc przetransferowana za pomoca pompy do miejsca uboju.

The fish pump will automatically pump fish to the killing station.
Pompa bedzie transferowac rybe do miejsca uboju automatycznie.

Operators in the harvest station should ensure the start/stop button is working correctly.
Zaloga musi miec pewnosc ze start/stop przycisk jest sprawny i gotowy do uzycia.

12. Stunning and bleeding

Oglszanie i wykrwawianie

All fish arrive into the Killing Station and placed in percussive RB6 stunners to render them unconscious; once fish has been unconscious automatic bleeder will cut the gills. When using MT5 stunners manual bleeding must be done within 10 seconds of fish being manually
Ryba przetransferowana z klatki do stacji uboju musi byc w jak najkrotszym czasie ogluszona za pomoca pneumatycznych ogluszczy RB6. Po ogluszeniu automatyczny noz przetnie skrzela w celu umozliwienia wyrwawienia sie ryby.Przy uzyciu ogluszaczy MT5 reczne podcinanie skrzeli musi byc wykonae w ciagu 10 sekund

13. Manual Bleeding

Reczne podcinanie skrzeki

3gill arches must be cut with no nicking of the gill cover
3 skrzela musza byc podciete w celu prawidlowego wykrwawienia.

Another leaked document – [‘Standard Operating Procedure: Packing Scales’](#) - included:

BLAR MHOR PROCESSING DEPARTMENT
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
PROCESSING - SOP – PACKING SCALES			11
Revised or amended date	30.01.2023	Next revision date	30.01.2024
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

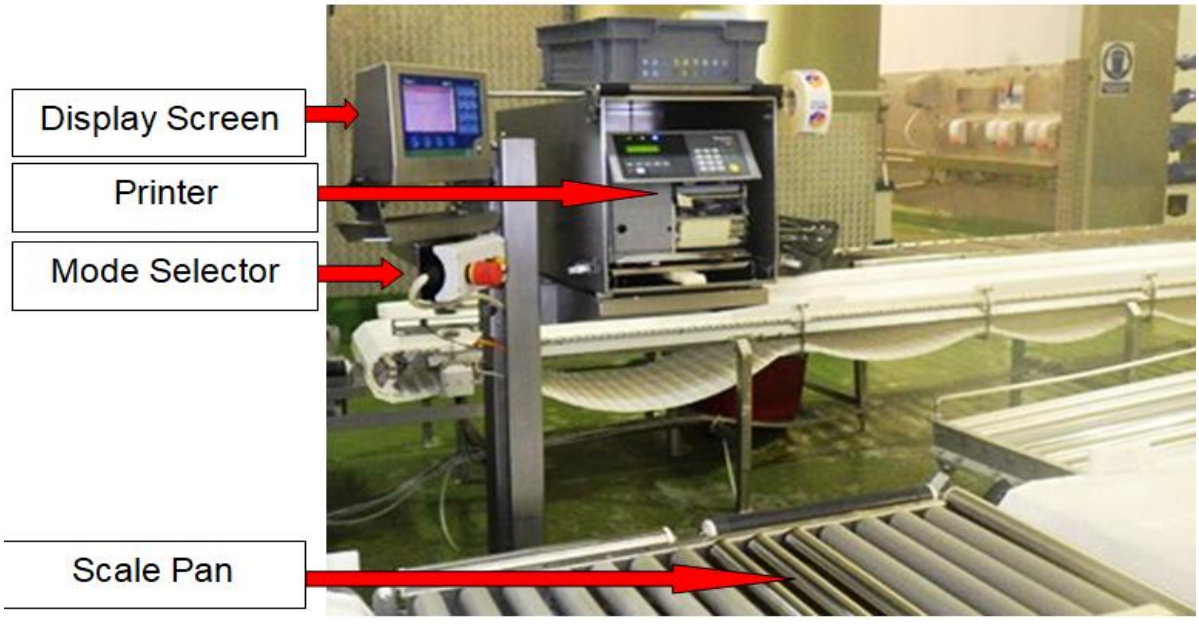
Purpose:	Confirmation of box contents, correct label production and application
Responsibility:	Packing Scales Operators
Health and Safety:	Risk Assessment PROCESSING - SOP – PACKING SCALES
References:	QUALITY – GUIDE - GRADING STANDARDS(PHOTOS), QUALITY – PRO - GRADING STANDARDS (WRITTEN) QUALITY – PRO - SPECIAL CUSTOMER REQUIREMENTS PROCEDURE PROCESSING - OPP – TEMPERATURE CONTROL PROCEDURE

Job Requirements:

PACKING SCALES OPERATIVES **MUST** BE TRAINED IN THE GRADING OPERATIONS

The packing scales operative is required to correctly confirm the contents of the box currently on the Scale pan matches the quality and size shown on the screen display for that box, then correctly pack and label and attach additional labels where required.

The Operative must also control the flow of boxes to and from the Packing scales in a timely manner to prevent excessive build up of boxes either to or from the operation.



INSPECTION OF BOXES AT PACKING SCALES

- When the box stops on the scale the information displayed on the screen must be compared against a visual check of the contents of the box
- At this stage, the quality of the fish is inspected and the placement of the fish in the box must be re-aligned if required

- If the visual inspection confirms the quality and information on screen is correct the operator can continue
- The operator may change the number of fish on the screen to correspond with the actual number in the box only if this is allowable for the Customer.
- Boxes with incorrect fish numbers in the box or differing quality may be brought into tolerance by the removal of fish deemed incorrect or replacement or addition of fish that meet the criteria of that box. Fish removed from a box at this stage must be placed into a bin of slush ice

LABELLING

- The operative then has an option of either manually verifying the information of the box by pressing the 'Accept' button on the screen, or setting the scale to automatically produce labels if the weight meets a pre-set tolerance

- Additional labels may need to be applied to meet customer specifications as detailed in:

QUALITY – PRO - SPECIAL CUSTOMER REQUIREMENTS PROCEDURE

Another leaked document – [‘Standard Operating Procedure: Preparation of Gill Tags’] - includes:

BLAR MHOR PROCESSING DEPARTMENT STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
PROCESSING - SOP – PREPARATION OF GILL TAGS			11
Revised or amended date	30.01.2023	Next revision date	30.01.2024
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: Printing tags
Responsibility: All designated Trained Personnel
Health and Safety: Risk Assessment PROCESSING - SOP – PREPARATION OF GILL TAGS
References: PROCESSING - OPP – TAGGING PROCEDURE PROCESSING - OPP – TEMPERATURE CONTROL PROCEDURE
Job Requirements: The Video Jet consists of an enclosed set up screen, touch pad and ink cartridge holder along with a moveable print head assembly and sliding tag strip holder. There are currently two Videojet models in use The print head prints a desired sequence of numbers or letters on each tag. This “code” can be used in traceability of the product for Customer and or Quality Standards.

Correct code legibility and alignment of tag printing

- The printed “codes” must be constantly monitored for legibility and alignment (see below). In case of any faults, the process should be immediately stopped and Processing Line Management must be informed.

Another leaked document – [‘Standard Operating Procedure: Preparation of Virasure Disinfectant’] - includes:

BLAR MHOR OPERATIONS STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
OPERATIONS-SOP-HARVESTING-PREPARATION OF VIRASURE DISINFECTANT			6
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: Correct and safe preparation of 2% Disinfectant solution.
Prawidlowe i bezpieczne przygotowanie przygotowanie 2% roztworu dezynfektantu.

Responsibility: Operations Operatives
Pracownicy działu operacyjnego

Health and Safety: Preparation of Virasure Disinfectant 1% RA
Karta Oceny Ryzyka Przygotowanie Virasure Dezynfektantu 1%
Appropriate PPE clothing to be worn
Należy stosowac adekwatne ubranie ochronne

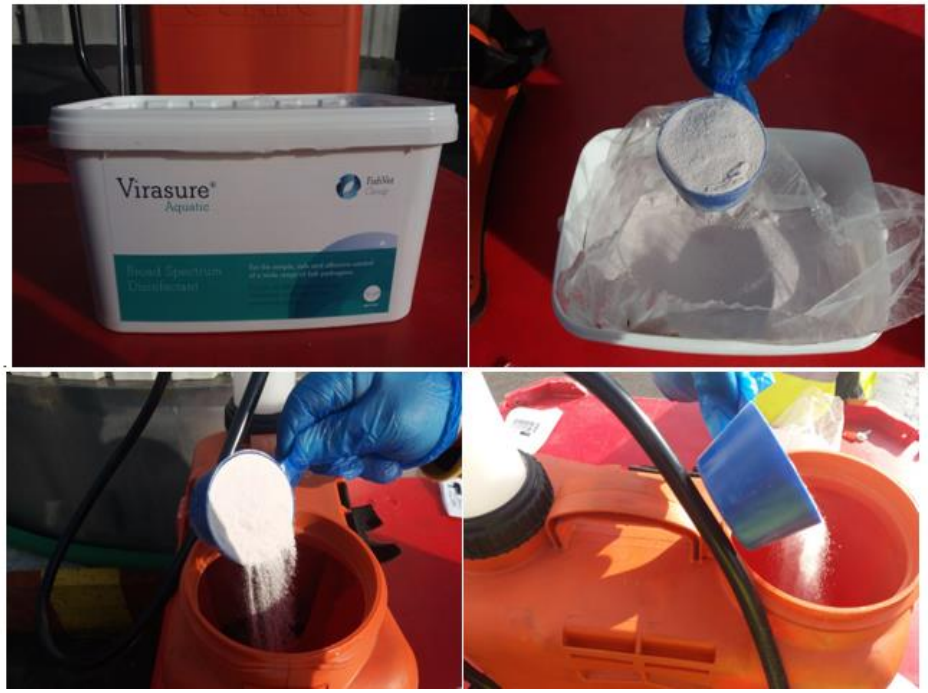
Virasure is a Surface Disinfection for buildings, equipment, well boats, food processing plants etc.

When used at recommended dilution is environmentally friendly with low toxicity

Virasure Dezynfektant przeznaczony jest do dezynfekcji budynkow, osprzętu, łodzi do połowu ryb, zakładów przetwórstwa rybnego itp.

PREPARATION OF VIRASURE DISINFECTANT AT DILUTION RATE OF 1:100 (1%)

- Add 2 full scoops of Virasure powder to the Knapsack Sprayer
  Dodaj 2 pełne miarki proszku do opryskiwacza



. Pour 20L of clean water.
Wlej 20 litrów czystej wody

- Screw the top lid on. Tighten so that the pressure will not escape from the tank.
  Zakręć górną pokrywe aby powietrze nie wydostawało sie z pojemnika

Another leaked document – [‘Standard Operating Procedure: Tanker Bay – Product Hold Yard’] - includes:

BLAR MHOR OPERATIONS STANDARD OPERATING PROCEDURE(SOP)			
Title			Version Number
OPERATIONS-SOP-TANKER BAY- PRODUCT HOLD YARD			8
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To ensure any tanker(s) and / or bin(s) which are suspected of having a food safety issue have been isolated to prevent the product being processed.

PPE Required

Isolation of Tankers:

Odizolwanie cystern:

- Using a safety cones kit, cordone off any tanker(s) which are suspected of having a food safety issue.
  Przy uzyciu tasmy oraz pacholkow odgrodz cysterny ktore ogoa zawierac zagrozony product (losos)

- Place ON HOLD sign on the rear 10" tanker guillotine valve.
  Umiesc znak HOLD ON na tylnim zaworze gilotynowym.

Isolation of Bins:
Odizolowanie binow:

- Using a safety cones kit, cordone off any bin(s) which are suspected of having a food safety issue
  Przy uzyciu tasmy oraz pacholkow odgrodz pojemniki ktore moga zawierac zagrozony product (losos).

- Display ON HOLD signs.
  Umiesc znaki HOLD ON.

Another leaked document – [‘Standard Operating Procedure: Yard – Fish Evacuation’] - includes:

BLAR MHOR OPERATIONS
STANDARD OPERATING PROCEDURE(SOP)

Title			Version Number
OPERATIONS-SOP-YARD-FISH EVACUATION			6
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: This Work Instruction is in place to ensure that in the event of a tanker not being finished before the end of production, all fish are evacuated from the fish pump delivery system.

Instrukcja ma na celu zapewnienie prawidlowego oproznienia system do rozladunku cystern z ryba w przypadku gdy cysterna niezostanie oprozniona do konca

Responsibility: Yard Operatives
Pracownik Yardu

Health and Safety: Risk Assessment RA
Ocena Ryzyka RA

PPE Required

- Shut the 10" tanker guillotine valve.
  Zamknij gilotynowy zawor cysterny.

- Using the pneumatic air guillotine valves to shut both lines .
  Przy pomocy pneumatycznych zaworow zamknij obydwie line.

- Using pneumatic air sleeve system disconnect 10" shark hose pipe from the tanker.
  Przy uzyciu pneumatycznego systemu odlacz rure od cysterny.

- Put all remaining fish from the 10" shark hose pipe to the harvest bin prepared as described in "SSW harvest bins preparation" Mark the bin and inform Quality Monitor on duty.
  Wszystjie ryby ktore zostaly w rurze wrzuc do pojemnika przygotowanego zgodnie z instrukcja SSW

- Fill up flash tank with clean water as described in SOP "Fish pump Hygiene"
  Napelnij zbiornik do plukania systemu czysta woda tak jak opisano w instrukcj "Fish Pump Hygiene"

Here's a close up of the bloodwater leaking out from the tanker:

Another leaked document – [‘Standard Operating Procedure: Harvesting – Removal of Dispatched/Trapped Fish From RB6-RB7 Machines’] - includes:

BLAR MHOR OPERATIONS
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
OPERATIONS-SOP-HARVESTING-REMOVAL OF DISPATCHED/TRAPPED FISH FROM RB6-RB7 MACHINES			6
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: This operating procedure covers the safe removal of dispatched / trapped fish from the RB6-RB7 Stunning, bleeding machines

Responsibility: *All personnel*

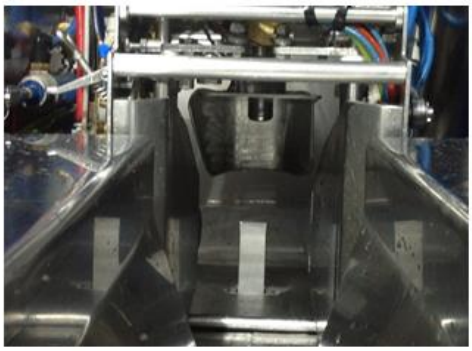
Health and Safety: Protective clothing, Protective footwear, Protective gloves (where required), Safety goggles (where required)

2. **Hazard Identification**	**Pneumatically controlled Stunner / bleeding machines Models RB6 – RB7 pose a significant risk to the operator if the correct isolation procedures are not followed prior to manually extracting dispatched, trapped fish from the blade – hammer mechanisms**

Warning signage

Bleeding blade

Warning signage



Warning signage & Safety measures

- Danger – Sharp edges watch your fingers
- Warning – Remove bleeder cylinder before starting any work on machine
- Caution – Heavy (45kg) Must be lifted by two people

Note:
Only trained experienced machine minders will operate this machinery.
Only trained experienced service engineers will service, adjust and maintain this machinery

Both the RB6 – RB7 machines models must have their HAMMER & KNIFE mechanisms isolated before a manual extraction of trapped fish is attempted.

Under no circumstances must the manual extraction of trapped fish take place without the isolation of pneumatic air supply to the Hammer & Knife mechanisms, failure to follow this procedure could lead to serious injury.

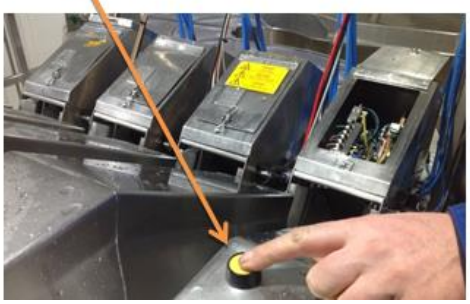
Under normal circumstances pressing the automatic reset button of either the RB6-RB7 machines will retract the hammer and the blade mechanisms, opens the FAD fish alignment device and opens the trigger plate, releasing trapped fish

Should a fish become trapped in the machine mechanism for any reason your first course of action will be to:

- Press the Automatic Reset Button on both the RB6 / RB7 Models
- Machines will reset retracting blade and hammer mechanisms allowing trapped fish to pass through the machine
- The RB6 machine also has a reset button accessible under the machine hood via the access cover, press this to reset the machine

Resetting the machine via the auto reset buttons

Reset Button RB6 / RB7 Models



Reset button (RB6 only)

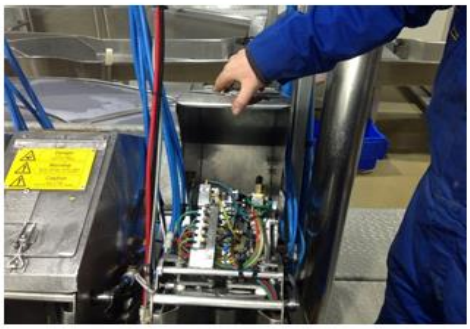
Hood access

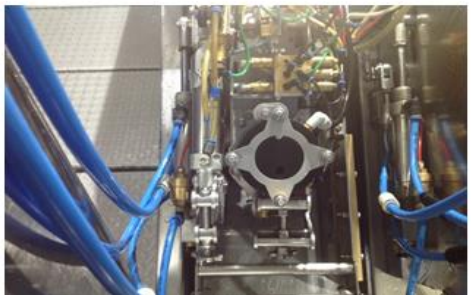
Opening the machine hood will fully exhaust the airlines and expose the hammer cylinder

- Release and lift RB6 / RB7 machine hood cover
- Once opened any residual air will be exhausted (this may take a few seconds)
- The hammer cylinder is now ready to be lifted

Note: you should not put your hand / hands into the trigger, knife or hammer zone at any point

. **Opening the machine to access hammer cylinder**



Once exposed you can now access and lift the hammer cylinder allowing the safe manual removal of trapped fish

Lifting the hammer cylinder

- Place hand on top of the cylinder and lift, if there is resistance, wait a few seconds there may still be air that requires exhausting from the system
- Once all air has been exhausted, the cylinder will lift freely and trapped fish can be safely removed

Note: take care to keep hand / hands clear of knife area at all times

Ergonomic Risk Factors	Explanation and mitigation techniques
Musculoskeletal strains, sprain type injuries	× Musculoskeletal injuries due to incorrect manual handling techniques × Tissue bone damage from exposure to sharp knife blade ✓ Use correct manual handling techniques when lifting heavy objects ✓ Correct safe operating procedure to be used at all times ✓ Appropriate PPE must be worn

Another leaked document – ‘Standard Operating Procedure: Bin Wash – Sanitizer Soak Bin Preparation’ - includes:

BLAR MHOR OPERATIONS
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
OPERATIONS-SOP-BIN WASH-SANITIZER SOAK BIN PREPARATION			7
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: Correct and safe preparation of soak bin detergent

Responsibility: Operations Operatives

Health and Safety: OPP BIN WASH CHEMICALS IN USE

References: Risk Assessment SOP SANITIZER SOAK BIN PREPARATION

Personnel working in this area must hold a Chemical Handling certificate

Compulsory use of goggles or safety glasses

Appropriate waterproof clothing to be worn

PPE Required:

Job Requirements:

The rinse bin solution is to be 300 litres of "COLD" water with 5 litres of alkaline sanitiser added. The target range for the solution must be between 0.3% - 1%

A designated 1000 Litre SANITIZER SOAK BIN that has been marked with a predetermined Fill line is to be used which will ensure the cold water addition is controlled to 300 Litres

To achieve the Target range solution

Fill the designated 1000 Litre SANITIZER SOAK BIN to the fill line with cold water. The fill line ensures 300 litres.

BASE SHEET FILL LINE

2. Using a designated bucket Add 5 Litres of alkaline sanitiser to the Bin.

Another leaked document – [‘Standard Operating Procedure: Harvesting – Stunners RB6 Cleaning’](#) - includes:

BLAR MHOR OPERATIONS STANDARD OPERATING PROCEDURE(SOP)			MOWI
Title			Version Number
OPERATIONS-SOP-HARVESTING-STUNNERS RB6 CLEANING			6
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To maintain harvesting RB6 Stunners in a clean and sanitized condition. Utrzymanie ogluszczy RB6 w nalezytej czystosci.
Responsibility: Hygiene operators Osoby wyznaczone do sprzatania
Health and Safety: Risk Assessment Ocena Ryzyka When working with chemicals eye protection and face mask must be worn. Podczs pracy z chemikaliami uzywaj gogle,przylbice oraz sprzet ochronny gornych drog oddechowych (maski) .

Approved Chemicals Used & Dilution Zatwierdzone substancje chemiczne				**Equipment** Wyposazenie	**Comments** Komentarz
Product Produkt	**Use %** Stosowac%	**Symbol** Symbol	**Hazard** Ryzyko		
SUPERKLENZ	5 %			**Sprayer** Spryskiwacz	**Used in spray all harvest floor equipment.** Urzywac do spryskiwania stacji polowow.
STERIKLENZ 5	2 %			**Sprayer** Spryskiwacz	**Used in spray all harvest floor equipment.** Urzywac do spryskiwania stacji polowow.

PPE Required:

Wash Down.

Mycie.

For ease of cleaning remove the Stunner from the 'Stunning Slope Table' and place it on the 'bleeding table'.

W celu ulatwienia czynnosci zwiazanych z czyszczeniem ogluszacza przenies maszyne ze stolu skosnego na stol plaski (bleeding table)

- Release clamps and swing cover back.
  Zwolnij zaciski i odchyl pokrywe ogluszacza do tylu.
- Using a freshwater hose, clean thoroughly all external and internal surfaces of the Stunner cover.
  Za pomoca czystej wody splukaj dokladnie wszystkie zewnetrzne i wewnetrzne powierzchnie pokrywy ogluszacza.
- Remove the Stunner sleeves and place them in the designated container.
  Usun plastkowe nakladki i umiesc je w wyznaczonym do tego pojemniku.
- Release the 'Hammer Cylinder Lock', disconnect the air supply hoses. Take the 'Hammer Cylinder' away for cleaning.

Spraying of chemicals.
Natrysk chemikalii.

Preparation of chemicals (5% solution):
Przygotowanie chemikalii (roztwor 5%):

- Pour 5 l clean water into the bucket(blue).
  Do niebieskiego wiaderka wlej 5 litrow czystej wody.
- Measure 200 ml of approved chemicals and carefully pour into the bucket with clean water.
  Odmierz 200 ml zatwierdzonych chemikalii i ostroznie wlej do niebieskiego wiaderka z czysta woda.
- Stir well.
  Dobrze wymieszaj.
- Ready solution put into the sprayer.
  Gotowy roztwor wlej do spryskiwacza.
- 5.Screw the top on. Tighten so that the pressure will not escape from the tank.
  Dobrze zamknij gorna pokrywe spryskiwacza mocna ja dokrecajac.
- 6.Rinse the bucket and measuring jug with clean water.
  Wiadro i dzban do odmierzania chemikalii dokladnie oplukaj czysta woda.
- 7.Pump the handle to increase pressure inside the tank.
  Pompojac za pomoca raczki znajdujacej sie na gorze spryskiwacza zwiekszysz cisnienie wewnatrz pojemnika.

Thoroughly spray all external and internal surfaces of the machine and leave in contact with the chemicals for 10 minutes before 'green pad' cleaning can begin.
Spryskaj dokladnie wszystkie zewnetrzne i wewnetrzne powierzchnie ogluszacza a nastepnie pozostaw na okres 10 minut.

Disinfection:
Dezynfekcja:

Preparation of Sanitizer 2% solution:
Przygotowanie dezynfektantu(roztwor 2%):

- Pour 5l. clean water into the bucket(red) .
  Do czerwonego wiaderka wlej 5 litrow czystej wody.
- Measure 100 ml. of approved Sanitizer and pour into the bucket with clean water.
  Odmierz 100 ml Sanitaizera i ostroznie wlej do czerwonego wiaderka z czysta woda.
- Stir well.
  Dobrze wymieszaj.
- Ready solution pour into the sprayer.
  Gotowy roztwor przelej do spryskiwacza.
- Screw the top on. Tighten so that the pressure will not escape from the tank.
  Dobrze zamknij gorna pokrywe spryskiwacza mocna ja dokrecajac.
- Rinse the bucket and measuring jug with clean water.
  Wiadro i dzban do odmierzania sanitaizera dokladnie oplukaj czysta woda.
- Pump the handle to increase pressure inside the tank.
  Pompojac za pomoca raczki znajdujacej sie na gorze spryskiwacza zwiekszysz cisnienie wewnatrz pojemnika.

Thoroughly spray all external and internal surfaces of the machine.

Note- Disinfectant left on the Stunner must be rinsed with fresh water prior harvest.

Another leaked document – ‘Standard Operating Procedure: Suction Cleaning’ - includes:

BLAR MHOR PROCESSING DEPARTMENT
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
PROCESSING - SOP – SUCTION CLEANING			9
Revised or amended date	10.01.2022	Next revision date	10.01.2024
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To ensure fish are gutted and cleaned correctly and that a check for the quality of gutting has been carried out prior to leaving the gutting system

Responsibility: Processing Manager, Processing Line Managers, Factory Operatives

References: PROCESSING – SOP – BAADER FEEDING
PROCESSING – OPP - TEMPERATURE CONTROL PROCEDURE
QUALITY – PRO - QUALITY CHECKS POST EVISCERATION

Health and Safety: Risk Assessment PROCESSING – SOP - SUCTION CLEANING

Job rotation is compulsory between Baader feeding and the Suction Cleaning Operations. The Operator performing Baader feeding duties must note the fish number on the counter when beginning to work in this area and after a maximum 500 fish request a rotation of jobs with the Suction Cleaning operator

Job Requirements:

All personnel trained in this document will be trained in MOWI quality gutting standards
QUALITY – PRO - QUALITY CHECKS POST EVISCERATION

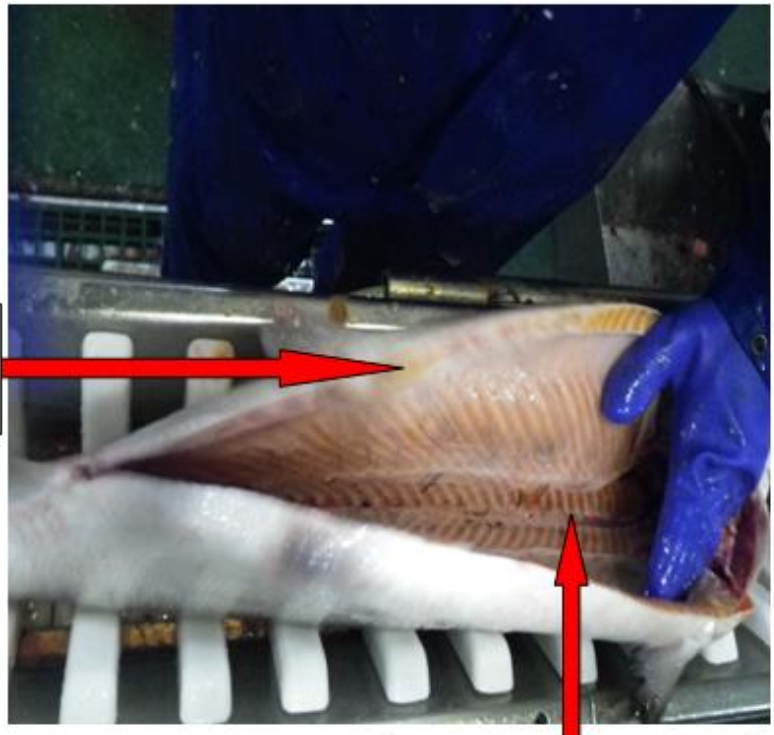
- After the fish has been automatically gutted through the Baader machine they will exit along the Baader ‘V’ belt.

Suction Cleaning Operation

During the Suction Cleaning operation the operative should exercise care to negate injury from the moving V-belt.

The operator must then remove any remaining kidney, guts or blood using the suction hose

- The operator must inspect the internal cavity of each fish for any signs of damage or poor gutting quality which may have been caused by the Baader gutting machine



Monitoring of fish quality

- It is the dual responsibility between the Baader operator and the Suction cleaning operator to continually check that the fish quality is not being compromised by the operation of the gutting machine.

  i.e. Damage caused by the gutting or suction tools which could either downgrade the quality or could incur yield loss to a further process must be immediately reported to Processing Line Management or a Factory Quality Monitor.

Damage

Squint Cut

Could incur yield loss during further processing.

Internal Damage

Would result in a downgrade.
Caused by damaged or misaligned tools

RISK MATRIX							
RISK RATING GUIDANCE	LIKELIHOOD (L)	5	5	10	15	20	25
		4	4	8	12	16	20
		3	3	6	9	12	15
		2	2	4	6	8	10
		1	1	2	3	4	5
			1	2	3	4	5
	SEVERITY (S)						
RISK RATING CATEGORY	HIGH RISK: 16-25	HIGH-RISK ACTIVITIES SHOULD CEASE IMMEDIATELY. FURTHER EFFECTIVE CONTROL MEASURES TO MITIGATE RISKS MUST BE INTRODUCED.					
	MEDIUM RISK: 10-15	MEDIUM RISKS SHOULD ONLY BE TOLERATED FOR THE SHORT TERM AND ONLY WHILST FURTHER CONTROL MEASURES TO MITIGATE THE RISKS ARE BEING PLANNED AND INTRODUCED.					
	LOW RISK: 1-9	LOW RISKS ARE LARGELY ACCEPTABLE. WHERE IT IS REASONABLE TO DO SO, EFFORTS SHOULD BE MADE TO REDUCE RISKS FURTHER.					

Another leaked document – [‘Standard Operating Procedure: Tanker Bay Operations’](#) - includes:

BLAR MHOR OPERATIONS
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
OPERATIONS-TANKER BAY-TANKER BAY OPERATIONS			9
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

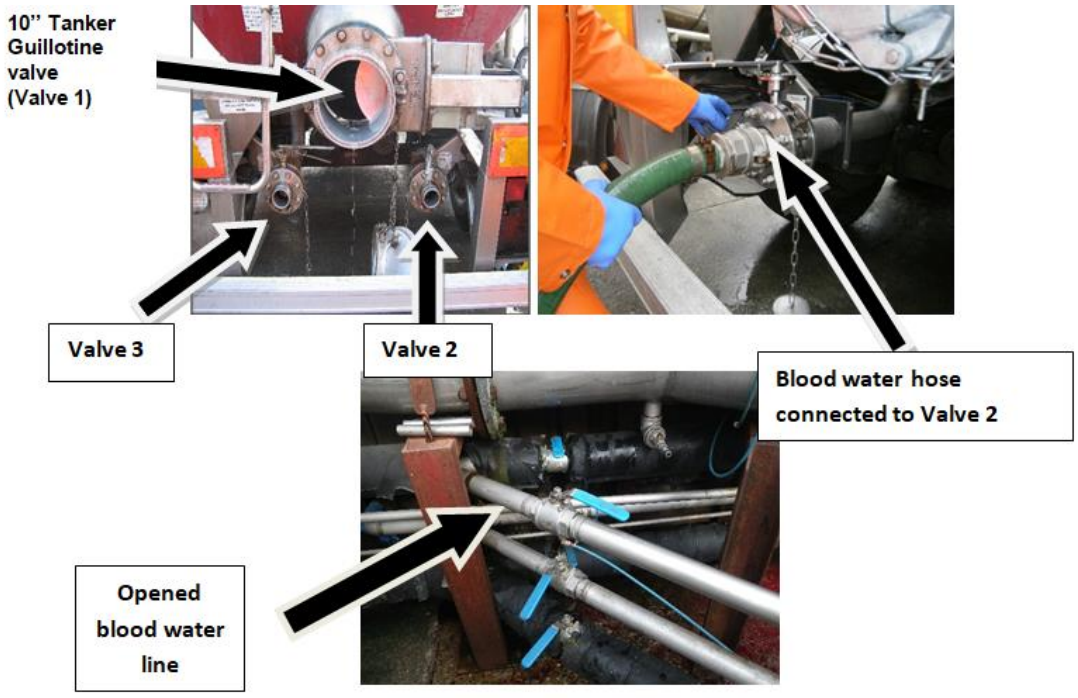
Purpose: To ensure tankers are operated and maintained to company procedures

Tanker Connection Podlaczeniue cysterny

- To the tanker outlet we connect a 10” Shark hose by a pneumatic air sleeve and clamp system.
  Za pomoca sterowanej powietrzem pneumatycznej tuleji oraz klamry do wylotu tankera podlaczamy 10 calowa rure.

Discharging the fish into the Factory

- Open the blood return valve on the tanker **Valve 2** (The blood water must circulate continuously until the tanker has been completely emptied of fish). Otworz zawor wody powrotnej znajujacy sie na tyle cysterny **Zawor 2** (Woda powrotna musi byc wnieustannie w obiegu az do momentu oproznienia cysterny z ryb).
- Make sure that the bloodwater pump is running and circulating the liquids
  Upewnij sie ze pompa wody powrotnej jest wlaczona i woda wraca do cysterny.



- Use the pneumatic air guillotine valve to open the correct line and ensure the other guillotine valve not in use is shut Za pomoca sterowanego powietrzem zaworu gilotynowego otworz odpowiedni rurociag. Upewnij sie ze drugi rurociag jest zamkniety.

- Open the rear guillotine valve on the tanker
  Otworz gilotynowy zawor znajdujacy sie na tyle cysterny

- Inform the Intake Operator via radio that the tanker is ready to discharge
  Za pomoca radia poinformuj operatora poboru ryby ze cysterna jest gotowa do wypompowania

Pumping should not begin until all lines are connected & all requied valves are open

Another leaked document – [‘Standard Operating Procedure: Tankers Recirculation’] - includes:

BLAR MHOR OPERATIONS
STANDARD OPERATING PROCEDURE(SOP)

MOWI

Title			Version Number
OPERATIONS-SOP-TANKER BAY- TANKERS RECIRCULATION			9
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose: To maintain a suitable temperature of slurry.

Approved Chemicals Used & Dilution				Equipment	Comments
Product	**Use/Dosage %**	**Symbol**	**Hazard**		
Steriklenz 5	2%	DISINFECTANT	IRRITANT	**Soak bin**	To soak coupling caps

Every tanker must be recirculated before fish will be pumped into processing. In the circumstances such as late arrival of tankers, breakdowns etc tanker can’t be recirculated , Yard Operator using a calibrated thermometer must check ice slurry temperature on arrival than record results on Slurry Check spread sheet ..\..\MALLAIG\Slurry check.xlsx and Efbr (Inbound Transports). Adequate comment must be added in comment section. **Kazda cysterna msi byc przerecyrkulowana zanim ryba zostanie wypompowana na linie produkcyjna.** Jezeli z powodu opoznionego przyjazdu cystern badz awarii itp. niemozna zrobic recyrkulacji operator yardu przy uzyciu skalibrowanego termometra musi sprawdzic temperature sleszu na

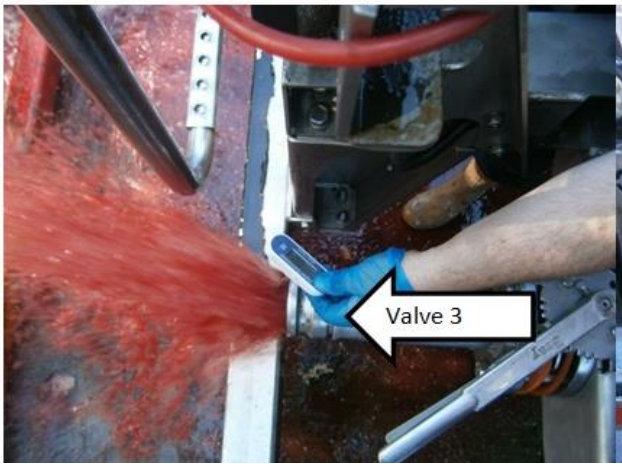
Once the tanker has been parked correctly support legs will be lowered, the drive unit removed and safety cones put in place in front of the tanker. Only after the driving unit is away should the Yard Operator proceed with the operation. Access ladders are then lowered, this locks all the trailer wheels. The safety barrier is then raised so that access can be gained to the top hatch.

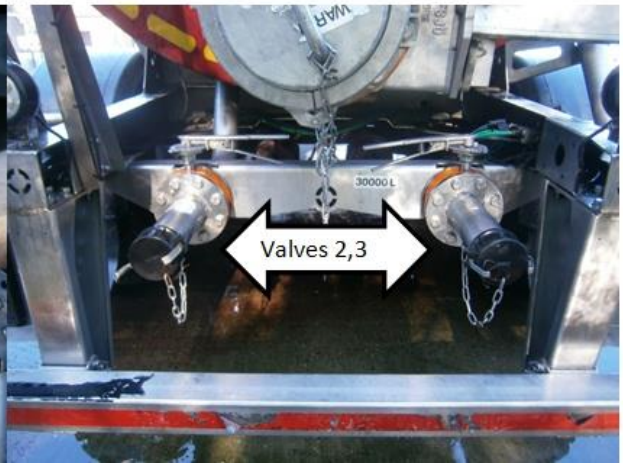
Procedure:

1. Open the top hatch and check visually if any of ice remained in the tanker. This is essential to determine time of recirculation. Tankers with remained ice have to be recirculated for 30 min, tankers without ice can be recirculate for maximum 20 minutes.
   Otworz gorna pokrywe tankera i sprawdz wizualnie ilosc pozostalego lodu w cysternie. Jest to istotne w celu okreslenia czas recyrkulacji. Cysterne w ktorej jest widoczny lod nalezy recyrkulowac przez 30 minut. Czas recyrkulacji cysterny bez lodu niemoze byc dluzszy niz 20 minut.

. Always wear clean disposable gloves. Open the rear tanker valve 3 next, using a calibrated thermometer check the ice slurry temperature (after recirculation). Once the reading has been taken dispose of gloves to the bin. Record results on Slurry Check spread sheet ..\..\MALLAIG\Slurry check.xlsx and Efbr (Inbound Transports). **If ice slurry temperature after recirculation in tanker is above 2 °C (internal target) Yard Operator must exchange ice slurry in accordance with Work Instruction SOP-Ice Slurry Exchange**

Zaloz czyste jednorazowe rekawice. Otworz tylni zawor cysterny 3. Nastepnie przy uzyciu skalibrowanego termometra sprawdz temperature slaszu. Odczyt zapisz na ..\..\MALLAIG\Slurry check.xlsx i na Efbr (inbound Transport). Jezeli temperatura slaszu przekracza 2 °C (wewnetrzny cel) operator yardu musi wymienic sleszz godnie z procedura SSW1033 (Wymiana/dolewanie sleszu).





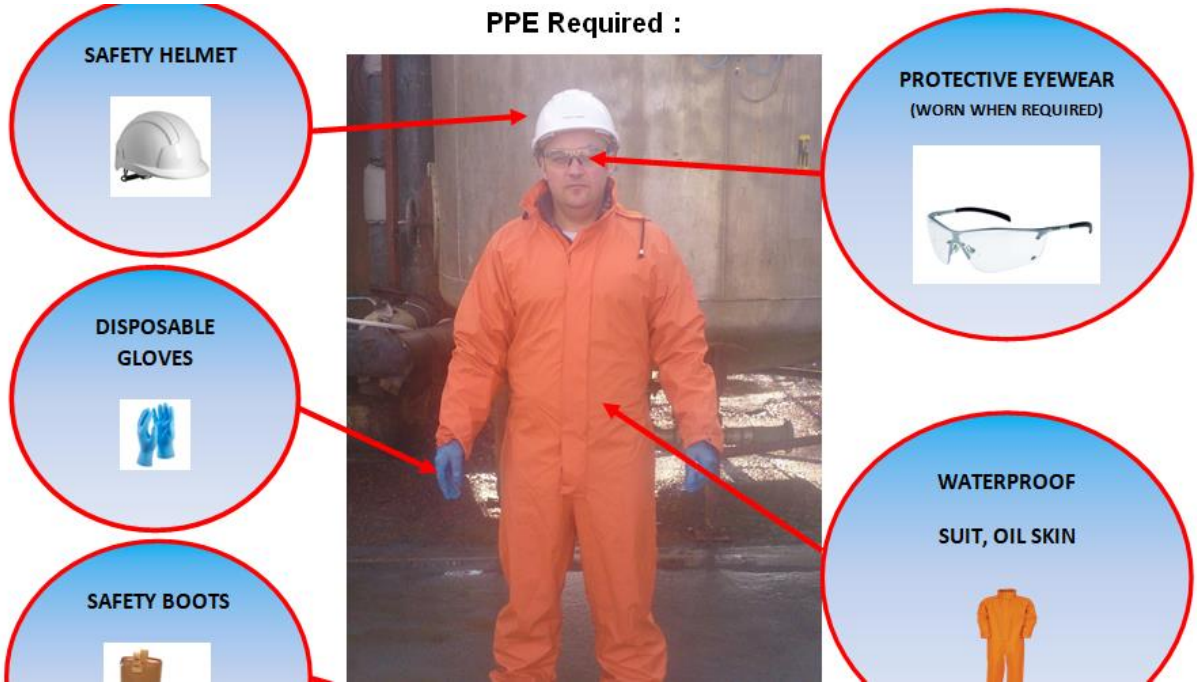
Another leaked document – [‘Standard Operating Procedure: Effluent Plant – Viscera Transfer’](#) - includes:

BLAR MHOR OPERATIONS
STANDARD OPERATING PROCEDURE(SOP)

Title			Version Number
OPERATIONS-SOP-EFFLUENT PLANT-VISCERA TRANSFER			6
Revised or amended date	01/08/2022	Next revision date	01/08/2023
The instruction within this document is a guide only and should be an accompaniment to practical training			
This document shall only be amended by designated persons on the authorisation of the Processing Departmental Manager			

Purpose:

Responsibility: Effluent Plant Operator



Before starting machinery ensure the following valve procedures are carried out, do not start machines with all valves closed, there must always be a route for the material to travel to tank.

Never run a pump against a closed system.

Always open valves in the line before closing the other valves this will prevent the possibility of pumping against a dead head.

Transferring material from factory outlet to Macerator tanks.

To transfer to macerator **1** open valve **7** and close valve **5**.

To transfer to macerator **2** open valve **5** and close valve **7**.

Macerator- acid dosing to the viscera

1. On the each start shift, check must be made that sufficient chemical is available in the IBC.
2. When 80% viscera level in macerator tank is reached than appropriate amount of acid will be added to the macerator tank.
3. After dosing compleated operator must take a sample from the sample point and check PH, result must be recorded in the' Daily Check Spreadsheet'

Transferring material from macerator tank 1 to the Storage tank

1. Ensure the switch on the air valve panel is pointing to tank **1**.
2. Valve **4** should remain closed.
3. Valve **3** should be in open position.
4. Open transfer valve on the Landia pump on the top of macerator **1**.

Ensure macerator tank **2** Landia pump is in the recirc position.

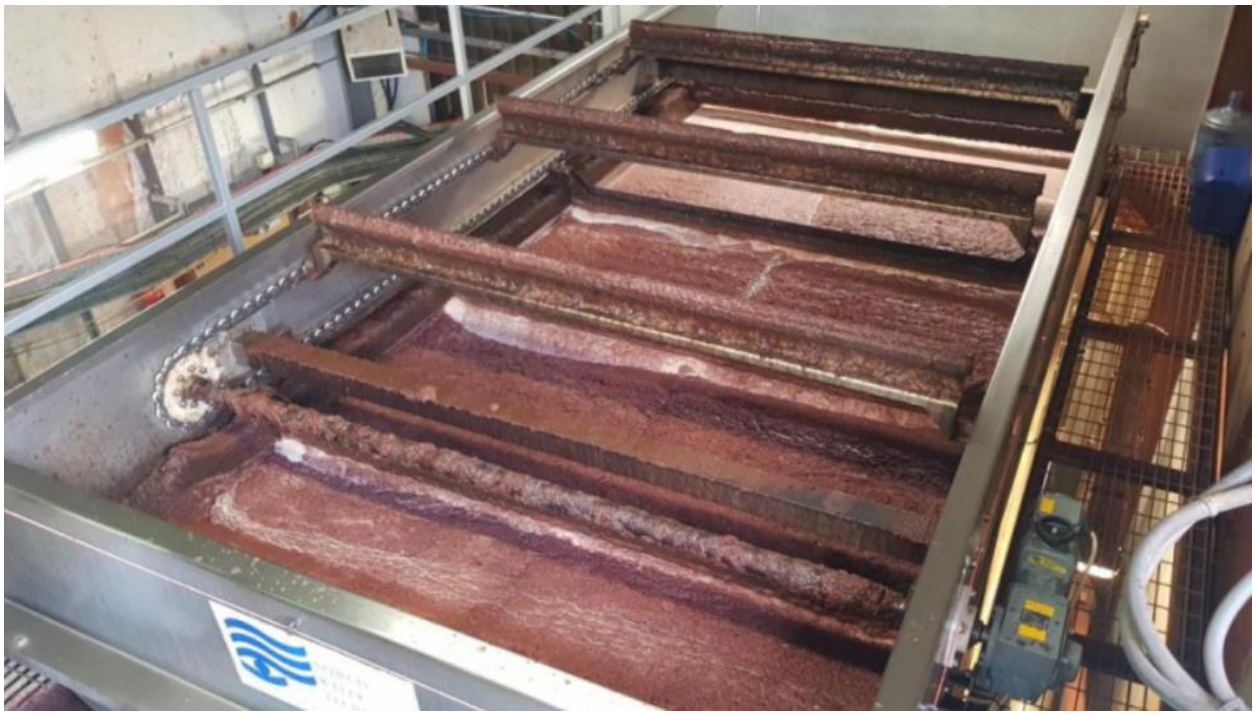
From Macerator 2 to storage tank (macerator pump running).

1. Ensure the switch on the air valve panel is pointing to tank **2**.
2. Valve **4** should remain closed.
3. Valve **3** should be in open position.
4. Open transfer valve on the Landia pump on top of macerator **1**.

Ensure macerator tank **1** Landia pump is in the recirc position.

It is important from a cost factor that the road tanker leaves the site with a full load

In November 2022, $camon $cotland published photos – obtained via Freedom of Information from the Scottish Government – of Mowi's processing plant in Fort William:



Read more via:
Going Down the Drain: Photos of Mowi's blood water treatment at "highly offensive & polluting" processing plant in Fort William

In October 2022, [$camon $cotland published damning details] – sourced from the Scottish Government's Fish Health Inspectorate – of biosecurity breaches at Mowi's Blar Mhor processing plant in Fort William:

Mowi's Blar Mhor processing plant has an appalling track record with Marine Harvest (renamed Mowi in 2019) fined £4,000 in 2005 for polluting the River Lochy with waste effluents - including fish viscera, blood and congealed fat deposits, scum and grease - following an investigation by the Scottish Environment Protection Agency.

Marine Harvest pollution in the River Lochy for which it was fined £ 4,000.

The Scottish Environment Protection Agency reported in 2005:

“This was a serious incident. The discharge was of a highly offensive and polluting nature. Sewage fungus present in the River can smother the bed of a watercourse, and can damage invertebrates and insect life. Secondary problems associated with smell from decaying matter were also reported to SEPA. The outfall to the River Lochy is immediately adjacent to a number of houses and Lochyside Primary School"

The Sunday Herald reported in May 2006:

Environment protection agency reveals Scotland's 'dirty dozen'

from **Sunday Herald, 28 May 2006**

Twelve industrial companies working across Scotland have been named by the Scottish Environment Protection Agency (Sepa) for failing to curb pollution risks.

The "dirty dozen" include some of the country's biggest firms and several repeat offenders. Many have breached pollution permits and several are facing legal action to force them to improve. Most of the companies accepted they made mistakes, but one launched a fierce counter-attack, accusing Sepa of being "heavy-handed" and "unprofessional".

Last week Sepa released its **Operator Performance Assessment** for 2005, covering about 200 industrial sites. The performance of 12 operators at 13 sites was judged "unsatisfactory" because of persistent failures to control pollution.

The lowest-ranked company was fish farming multinational **Marine Harvest**, which also failed Sepa's assessment the previous year. The company's Blar Mhor plant in Fort William has been served an enforcement notice for breaching eight conditions of its pollution permit, including a "no odour management plan".

Fish farming campaigners called on the company to clean up its act. "By discharging fish guts, blood, scum and grease into the River Lochy, Marine Harvest has jeopardised not only the health of wild salmon but also the already tarnished reputation of Scottish farmed salmon," said Don Staniford of the **Pure Salmon Campaign**.

Marine Harvest was "disappointed" by Sepa's rating. "We are working hard to improve results and, as part of that, structural changes were agreed and communicated to Sepa during 2005," said the company's environmental manager, Ben Hadfield.

Environment protection agency reveals Scotland's 'dirty dozen'

Repeat offenders and multinationals top Sepa's list of ecologically risky companies

SCOTLAND'S WORST POLLUTION MANAGERS

COMPANY	PROBLEMS	SEPA SCORE (lower = worse)
Marine Harvest fish processing plant Fort William	Eight breaches of pollution permit	12

Ironically, the 'MowiLeaks' document dump also includes a whistleblower policy document dated 2014 (when Mowi was called Marine Harvest – they changed their name in 2019 due to what their CEO admitted was "negative consumer perception"):

MARINE HARVEST WHISTLEBLOWER POLICY

Purpose and scope

The main purpose of this requirement document is to provide information about whistleblowing in Marine Harvest and to ensure predictability and confidence for all those who wants to speak up by giving guidance on how to proceed when raising concerns.

Speaking up is positive for Marine Harvest

Marine Harvest believes that openness and good communication throughout the organization promotes a better work culture. Marine Harvest acknowledges the risk of breaches of the Code of Conduct (CoC) and depends on the willingness of employees to raise concerns to uphold high ethical standards.

All employees and management in Marine Harvest's wholly-and included in the consolidated structure of Marine Harvest, or where Marine Harvest is lead operator entities have the right and responsibility to report concerns. Anyone reporting concerns can do so without fear of reprisals, according to the CoC and legal requirements, cf. Norwegian Working Environment Act §§ 2-4, 2-5 and 3-6.

It is of outmost importance for Marine Harvest to ensure predictability and confidence for all those who raise a concern.

What is reporting of concerns (whistleblowing)?

Reporting of concerns (whistleblowing) is to speak up about possible illegal actions and breaches of Marine Harvest's CoC. The definition of concerns in this context includes any violation of applicable laws and regulations applicable in Norway and the countries where Marine Harvest operates. It also includes violations of any of the ethical commitments included in the CoC in areas such as environment, human and labor rights, equality and diversity, health and safety, business ethics and anti-corruption, conflict of interest and professional behavior.

Examples of breaches include, but are not limited to:

- Suspicion of fraud, corruption and accounting offenses
- Error reporting or manipulation of information
- Harassment or bullying, discrimination and racism, poor working environment
- Damage to the environment

How to report concerns?

Reports of concerns can be made either verbally or in written form to your manager, "grandfather", union representative, Group management, Human Resources or directly to Marine Harvest's independent Whistleblower Channel (link), managed by PwC. The use of the Whistleblower channel may be relevant where reporting to line management is not possible or difficult, or where such reports have not been handled adequately. Whistleblowers may of course seek advice from anyone he/she wishes.

The Whistleblower Channel gives the whistleblower the possibility to make a report **anonymously**. When reporting anonymously, the whistleblower must be aware that the receiver may not give feedback on the case or ascertain whether the disclosure was made in good faith. Furthermore, proper investigation may prove difficult if the information provided cannot be tested or verified and the investigator is unable to obtain further information from the whistleblower.

The whistleblower decides what information is to be provided. However, to ensure sufficient information so that Marine Harvest can perform adequate follow-up actions, the reports should include as much details as possible and, if available, supporting evidence.

Roles and responsibilities in handling of reports

PwC handles the Whistleblower channel

Upon receipt of a Whistleblower notification, PwC will perform a risk assessment on whether to investigate or refer the issue to Group Director HR, who, in accordance with internal procedures, refers the matter to management for decision.

In cases where an investigation is required, this will be carried out by a provider selected by management. The selected provider will in each case determine the investigation process and propose whether to engage external specialists and/or internal resources. In all cases to be investigated the Board of Directors will be informed without undue delay. Any investigation carried out by an external provider shall be fair, open and objective, with a focus on establishing the objective facts and determining appropriate follow-up.

Line Management, union representative, Group management and Human Resources

All line/Group managers and union representatives shall guide employees who want to raise a concern or have questions about how whistleblowing in Marine Harvest works. They have a responsibility to act properly and in accordance with law, regulations and Marine Harvest's governing documents when receiving and following up on whistleblower situations. This includes awareness of principles regulating anonymity, confidentiality and protection against retaliation. When receiving a report of concern, line/Group managers and union representatives shall handle such according to this Whistleblowing procedure.

In order to increase the likelihood of identifying unethical behavior, all managers shall work to facilitate a culture of openness and show leadership in dealing with whistleblower cases.

Logging and reporting from the Whistleblower channel

When management, union representative, Group management or Human Resources receive a notification, the receiver shall immediately log the issue in the Whistleblower channel. Depending on the content of the notifications, it is to be logged either as an issue of information or as a Whistleblower issue to be followed up in accordance with the Whistleblower procedure.

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The Policy Owner, the Corporate Risk Management team, Board of Directors and Audit Committee will regularly receive a summary report from PwC, the handler of the Whistleblower channel. The report will contain information of category, geographical location and performed follow-up actions of all reported issues received both as information issue and Whistleblower issue in the Whistleblower channel. If applicable, the report will also be forwarded to the relevant local management.

Principles for handling of reports of concerns

Marine Harvest has implemented procedures for the handling of reports of concerns. These procedures pay respects to both the whistleblower and to the individual(s) who is the subject of the report. Marine Harvest's basic principles for the handling of reports are:

- All reports are taken seriously
- Fair, open and objective follow-up
- Protection of anonymous whistleblowers
- Confidentiality and information security
- Whistleblowers in good faith will not be subject to reprisals
- Whistleblowers will get timely feedback and information about the process

Protection against retaliation

Whistleblowers, who notify in good faith, will not face any retaliation or other unfavorable treatment, even if it is later discovered that they were mistaken. A whistleblower that nevertheless experiences reprisals is urged to report this to line management and/or Group Director HR as soon as possible. Disciplinary action can be taken against any employee who is found to have made a disclosure maliciously that they know to be untrue.

Confidentiality

All reports of concerns and information related thereto shall be treated as confidential information. All personnel are required to maintain confidentiality about all information received.

Protection of sources

The identity of the whistleblower shall not be disclosed, unless permission in writing has been obtained from the notifying party. The protection of identity shall also be taken into consideration during the initial evaluation and the subsequent risk assessment when scoping the investigation, hereunder the existing level of risk exposure without disclosing the name of the notifying party. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law.

Personal data

Handling of reports of concerns will be done in accordance with the Norwegian Personal Data Act.

How to complain?

Both the whistleblower and the individual(s) the concern refers to may file a written complaint on the process and treatment they have received in connection with the proceedings. However, only issues regarding improper processing of receiving and handling notifications will be regarded. The complaint is sent to and processed by Group Director HR

A leaked Powerpoint presentation – 'Mowi IT and you' – includes:

Passwords

Passwords expire after one year. They should be a minimum of 12 characters long and should be pass phrases that you can remember but shouldn't be easy for others to guess (e.g. "Formula 1 McLaren").

Never leave passwords anywhere, and do not share passwords.

Password sharing and / or mis-management could lead to disciplinary action or dismissal.

Personal devices

Personally owned computers (or other IT equipment) must not under ANY circumstances be connected to the MOWI corporate networks.

Lock it when you leave it!

If you need to leave your computer, mobile phone or tablet, no matter how briefly, then ensure that you log out or lock it first.

Forgetting to lock or log out poses a security risk and leaves YOUR account open to abuse!

+ L

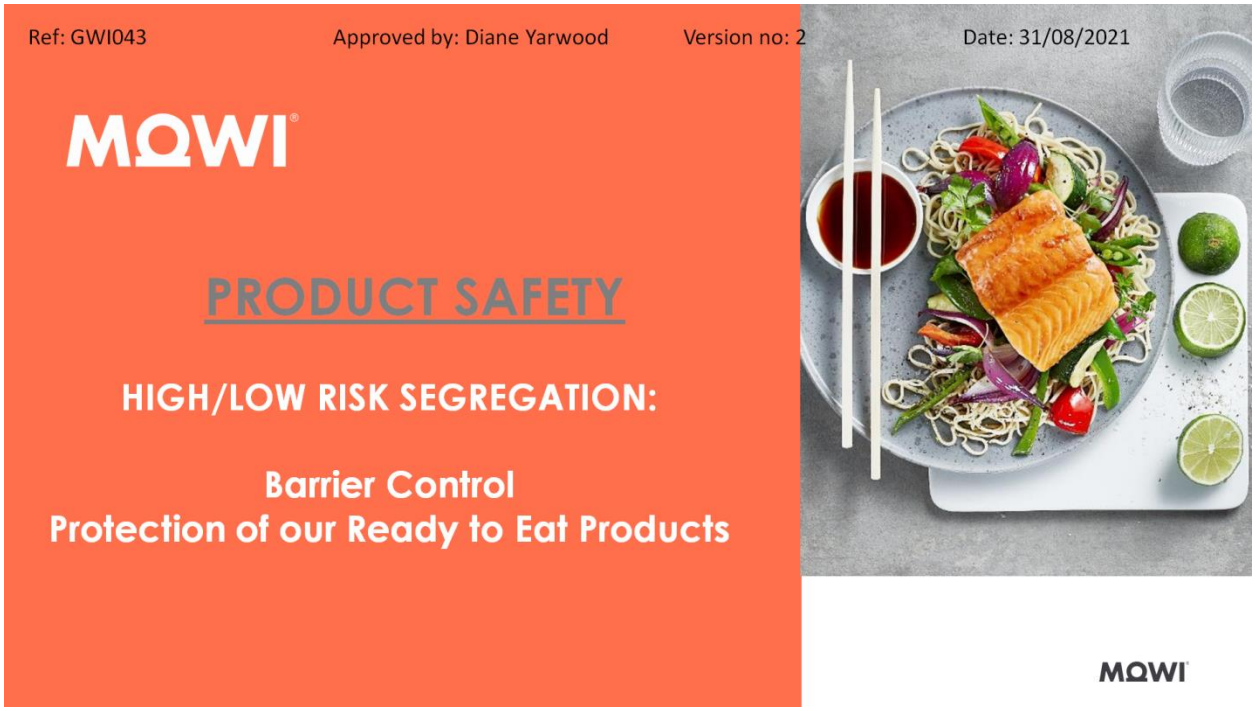
Sensitive data

Depending on your role within MOWI, you may have access to sensitive or confidential company or personal information.

You may be required to sign confidentiality agreements.

Another leaked Powerpoint presentation – [‘Contractor Induction’ dated May 2022](#) - includes:

Another leaked Powerpoint presentation – [‘Product Safety’ dated August 2021](#) – includes:



HIGH RISK - *products are ready to eat and have had a thermal process which kills all food poisoning bacteria.*

Safe for immune compromised people

HOT SMOKED AND POACHED SALMON

High/Low Risk segregation is ***essential to prevent*** cross-contamination during manufacture of these products.

Risk if fail: food poisoning bacteria contaminate product and grow making it dangerous

HIGH CARE – *products are ready to eat but have not had a thermal process capable of killing food poisoning bacteria.*

Not recommended for immune compromised people

COLD SMOKED SALMON

High/Low Care segregation is ***required to minimize the risk*** of cross - contamination during manufacture of these products

Risk if fail: food poisoning bacteria contaminate product and grow making it dangerous

MOWI

Environmental Hygiene Requirements – Factory

Listeria Monitoring

This is a fundamental requirement
within a high risk/care production area.

MOWI

All tools must be clean & free from rust

Engineering barrier control

Tools, Equipment and mobile devices must be sanitised with spray or wipes before entering high care & high risk areas if required in the area.

All tools should be segregated per area tool boxes are in each area
NO low risk tools to be used in high care/high risk areas.

All tools must be cleaned after use to reduce the risk of **allergen cross contamination** between line.

MOWI

A leaked Powerpoint presentation – ‘MOB Drill Guide PC vessels and workboats’ dated August 2020 and revised in September 2021 – includes:

MOWI

MOB Drill Guide PC vessels and workboats

August 2020
Revised September 2021

MOB stands for man overboard and refers to any persons who unintentionally ends up in the water from any vessel or structure.

MOWI requires **all sea going staff** who regularly work on vessels, barges and pens to undertake MOB drills **twice annually**. One of these must involve the recovery of a rescue manikin (Ruth Lee) from the water and the second can either use the rescue manikin or other floating object for retrieval.

Other staff who periodically have to travel by vessel overwater are required to complete a least one MOB drill with a rescue manikin as well as refresh their learning at a frequency determined by the company.

The Ruth Lee – Life size sea rescue manikins have proven to be a vital tool in achieving effective realism within the drill exercise.

It replicates an unconscious person in the water who would be unable to self-rescue.

Safe manual handling technique should be observed when handling. Ruth Lee manikin Weighs 45kg (dry weight) 65kg retrieval weight from water.

MOWI

Why are MOB Drills with a manikin required?

Requirement under the New workboat Code

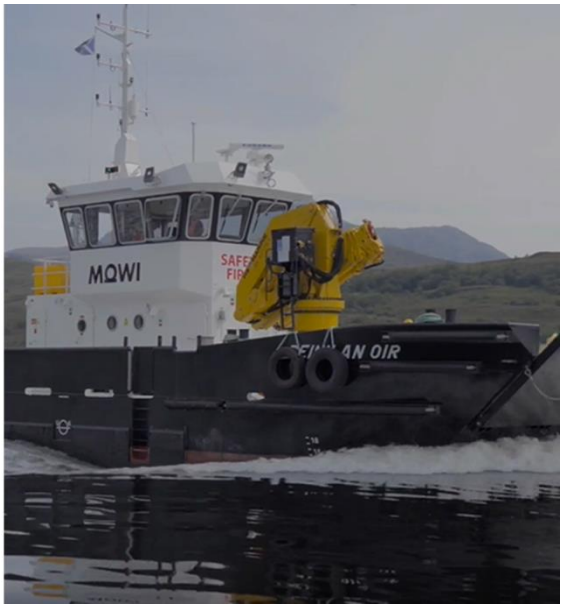
Section 13.13.1
"An efficient means to enable the recovery of an unconscious person from the water should be provided to the satisfaction of the Certifying Authority."

The benefits of practice drills

- familiarisation of emergency equipment and its use
- to develop your competencies and give you practice in carrying out a recue at sea
- to test well-established procedures
- to validate that these procedures are suitable or require refinement
- To prepare you to react effectively to an emergency

MOWI

MOWI - MOB Rescue Pole Drills - Workboats



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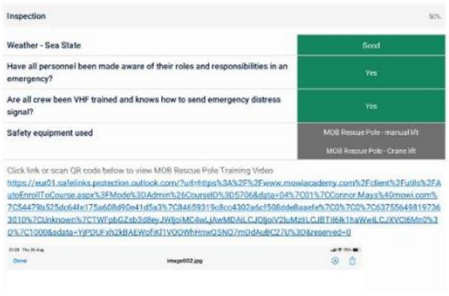
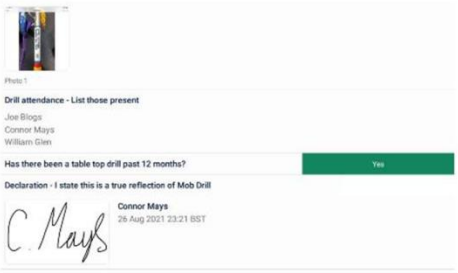
i-Auditor Drill exercise records

Managers and skippers are to enter the record of the MOB drill into I-auditor
Digitised record systems provide a log of those undertaking drill exercises – where, when, vessel & equipment used etc
QR Codes offer digital links to system operations, via mobile apps, phone etc.,





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MOWI

Read more background on how Mowi was fined £860,000 for the death of worker Clive Hendry in February 2020 (including negligence in terms of man overboard training):

"Widow will fight on over fish farm death" (West Highland Free Press)
Mowi Whistleblower: "Nothing has changed for the better safety wise....Health and Safety will NEVER be a priority within Mowi whilst Ben Hadfield is MD"
Mowi widow Catriona Lockhart on BBC Scotland's 'Drivetime' hammers Norwegian giant
Mowi hit by £800,000 fine for death of Clive Hendry & media backlash in Scotland!

A [leaked Powerpoint file on escapes] included:

Escape Information Sheet

MOWI

Escape Incident Information Sheet

SITE	DATE	NUMBER OF ESCAPES	CAUSE
Outer Grey Horse (Greanem) Scotland	03.06.2022	32 463	Poor net design combined with human error due to mechanical failure

What happened:
On lifting net for harvest two consecutive winches failed. This resulted in the sinker ring located beneath these winches to remain lowered while the rest of the ring was lifted to 5m. Boats were then used to lift the ring manually. The following day a 4x3 m hole was discovered in the net during net washing. All remaining fish in the pen were moved, and two weeks later all fish were moved from the site as the cause of the net hole was not fully understood.

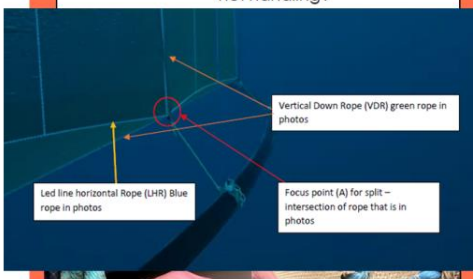
Why did it happen:
Due to net design the horizonal base line had been rubbing causing the ropes to fray and come apart (see images). This in conjunction with the addition weight placed on the ropes due to the sinker ring being left down caused the rope to snap in two places and split the net along the vertical seam. The supplier (Scale) has improved the design of the ropes after this incident, Mowi Scotland does not have this design in any other site.

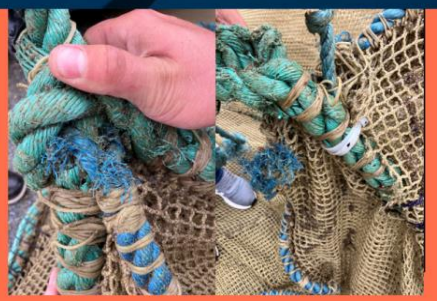
RECOMMENDATIONS

- All staff to receive formal winch pen training
- Update/refresh staff training on winch pens
- Regular checks/services of winches
- All winch ropes should be lifted simultaneously or in gradual stages to ensure synchronicity, incident could have been prevented if when observing the unbalancing winch push there would have been a moment to stop and re-start in a more gradual way
- Net design to be discussed with manufacturer

TAKE ACTION!

- Do you record network inspections at your site?
- Are there comprehensive procedures for the use and control of ropes during net handling?





Escape Information Sheet

MOWI

Escape Incident Information Sheet

SITE	DATE	NUMBER OF ESCAPES	CAUSE
Colonsay Scotland	16.06.2022	17 500	Seal/net tension

What happened:

The cage net was checked 24hrs prior to harvest , net was shallowed and harvest completed , cage net and Froya ring lowered , seal noticed in cage the next day , ROV put into cage and noted a hole on base at the double mesh on the bottom of a vertical , but also that the net at that point was highly tensioned , PG net was deployed to cover the hole till divers could rectify.

Why did it happen:
It would appear that a seal had made an initial breach in the net post harvest operation, but also that a couple of ties had come off the net and Froya ring on either side of the hole causing the Froya ring to drop and creating tension on the point where the net was connected and the net tore further.

RECOMMENDATIONS

- Nets and Froya ring ties should be checked prior to and post lifting event to ensure that the net integrity has not been breached and all net ties are secured

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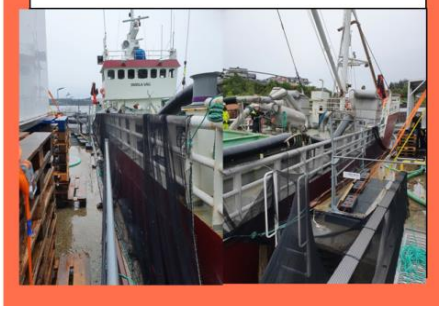
TAKE ACTION!

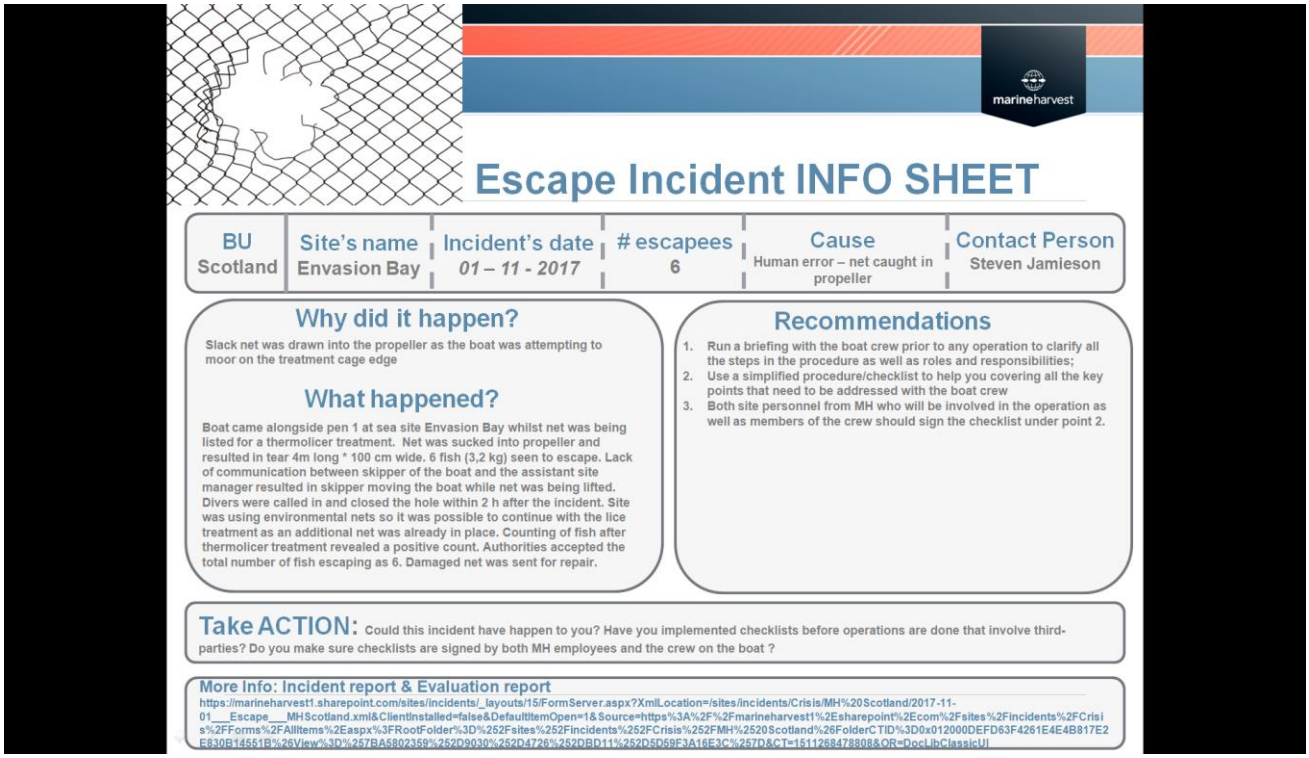
Could you have suffered this incident?

Do you record network inspections at your site?

Are there comprehensive procedures for the use and control of ropes during net handling?



Another [leaked Powerpoint presentation on escapes](#) included:



marineharvest

Escape Incident INFO SHEET

BU	Site's name	Incident's date	# escapees	Cause	Contact Person
Scotland	Envasion Bay	*01 – 11 - 2017*	6	Human error – net caught in propeller	Steven Jamieson

Why did it happen?

Slack net was drawn into the propeller as the boat was attempting to moor on the treatment cage edge

What happened?

Boat came alongside pen 1 at sea site Envasion Bay whilst net was being listed for a thermolicer treatment. Net was sucked into propeller and resulted in tear 4m long * 100 cm wide. 6 fish (3,2 kg) seen to escape. Lack of communication between skipper of the boat and the assistant site manager resulted in skipper moving the boat while net was being lifted. Divers were called in and closed the hole within 2 h after the incident. Site was using environmental nets so it was possible to continue with the lice treatment as an additional net was already in place. Counting of fish after thermolicer treatment revealed a positive count. Authorities accepted the total number of fish escaping as 6. Damaged net was sent for repair.

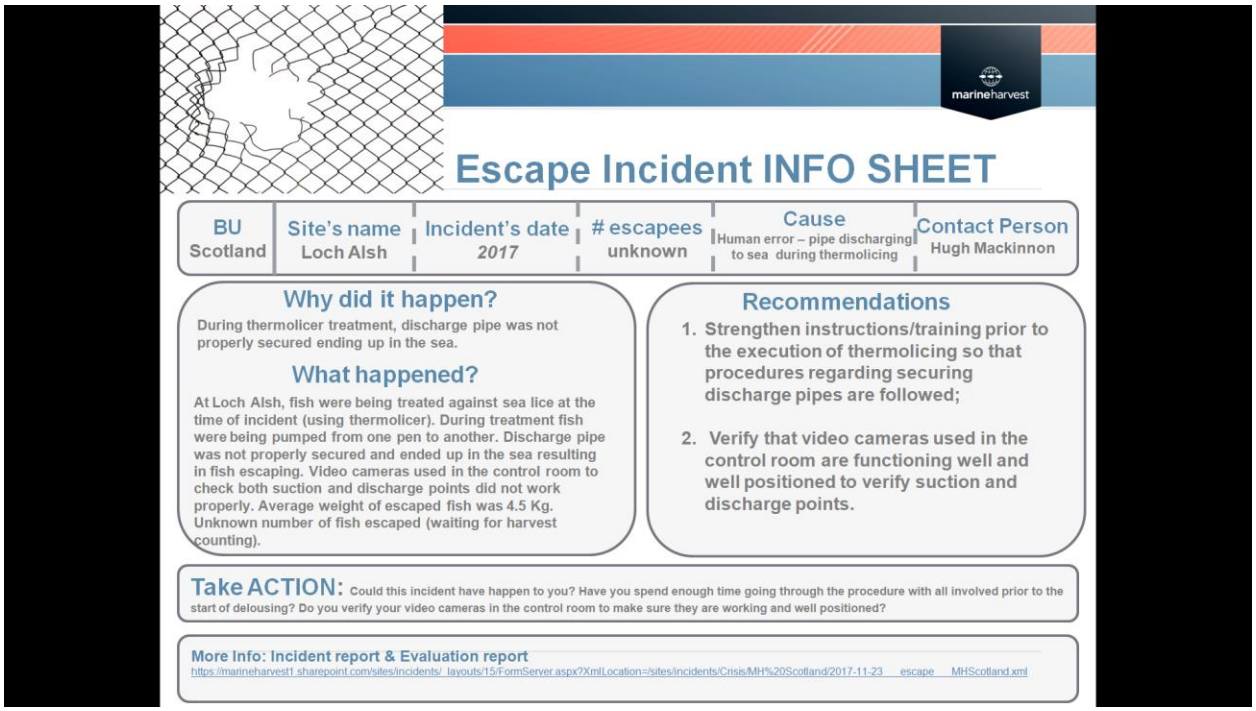
Recommendations

1. Run a briefing with the boat crew prior to any operation to clarify all the steps in the procedure as well as roles and responsibilities;
2. Use a simplified procedure/checklist to help you covering all the key points that need to be addressed with the boat crew
3. Both site personnel from MH who will be involved in the operation as well as members of the crew should sign the checklist under point 2.

Take ACTION: Could this incident have happen to you? Have you implemented checklists before operations are done that involve third-parties? Do you make sure checklists are signed by both MH employees and the crew on the boat ?

More Info: Incident report & Evaluation report

https://marineharvest1.sharepoint.com/sites/incidents/_layouts/15/FormServer.aspx?XmlLocation=/sites/incidents/Crisis/MH%20Scotland/2017-11-01___Escape___MHScotland.xml&ClientInstalled=false&DefaultItemOpen=1&Source=https%3A%2F%2Fmarineharvest1%2Esharepoint%2Ecom%2Fsites%2Fincidents%2FCrisis%2FForms%2FAllItems%2Easpx%3FRootFolder%3D%252Fsites%252Fincidents%252FCrisis%252FMH%2520Scotland%26FolderCTID%3D0x012000DEFD63F4261E4E4B817E2E830B14551B%26View%3D%257BA5802359%252D9030%252D4726%252DBD11%252D5D59F3A16E3C%257D&CT=1511268478808&OR=DocLibClassicUI



marineharvest

Escape Incident INFO SHEET

BU	Site's name	Incident's date	# escapees	Cause	Contact Person
Scotland	Loch Alsh	*2017*	unknown	Human error – pipe discharging to sea during thermolicing	Hugh Mackinnon

Why did it happen?

During thermolicer treatment, discharge pipe was not properly secured ending up in the sea.

What happened?

At Loch Alsh, fish were being treated against sea lice at the time of incident (using thermolicer). During treatment fish were being pumped from one pen to another. Discharge pipe was not properly secured and ended up in the sea resulting in fish escaping. Video cameras used in the control room to check both suction and discharge points did not work properly. Average weight of escaped fish was 4.5 Kg. Unknown number of fish escaped (waiting for harvest counting).

Recommendations

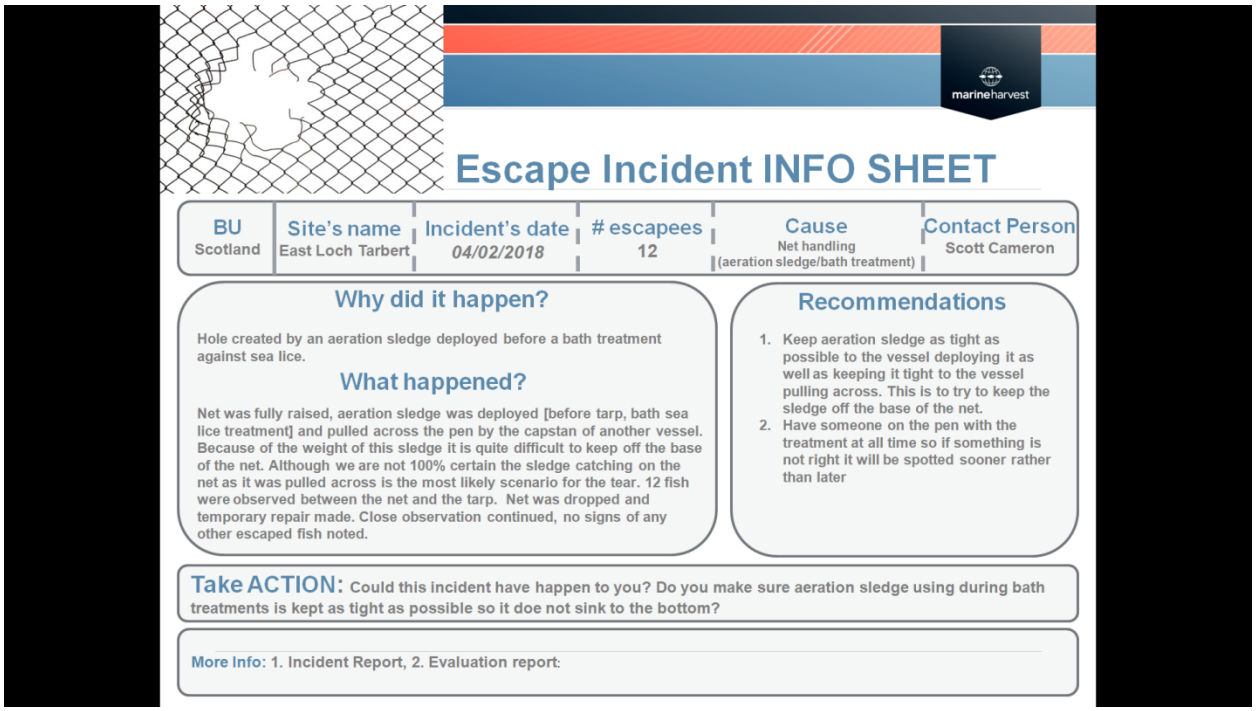
1. Strengthen instructions/training prior to the execution of thermolicing so that procedures regarding securing discharge pipes are followed;

2. Verify that video cameras used in the control room are functioning well and well positioned to verify suction and discharge points.

Take ACTION: Could this incident have happen to you? Have you spend enough time going through the procedure with all involved prior to the start of delousing? Do you verify your video cameras in the control room to make sure they are working and well positioned?

More Info: Incident report & Evaluation report

https://marineharvest1.sharepoint.com/sites/incidents/_layouts/15/FormServer.aspx?XmlLocation=/sites/incidents/Crisis/MH%20Scotland/2017-11-23___escape___MHScotland.xml



Read more on escapes via:

[Mowi's ASC Greenwashing Escapes Sanctions?]
[EXPOSED: “Disappointing” Breaches of Biosecurity at ASC-Certified Mowi - Call to Close Down Farms!]
[Farm salmon escape event: levels of farm/wild hybridisation]
[Science Advances: "Introgression from farmed escapees affects the full life cycle of wild Atlantic salmon"]
[There's No Escaping Norwegian Genetic Pollution For 'Scottish' Salmon!]
[Herald: "Fish farmers 'should face penalties and even criminal charges for mass escapes'"]
[‘At least 3,000’ salmon from Carradale escape made it to rivers, report says]
[Fish Health Inspectorate report from Hellisay fish farm: EIR release]
[Mowi plans tougher, 200m pens after third escape from exposed site]
[BBC One Show on Mowi's Great Escape]
[Escaped Argyll fish farm salmon found in three rivers in England]
[Escaped salmon from Argyll farm appearing in west coast rivers]
[Anglers told to kill escaped farmed salmon caught in rivers]
[Zero Escapees Recovered by Mowi Out of 48,834 - That's Officially 0%!]
[Far from Fine: Mowi Recaptures Less Than 1% of Escapees in Scotland!]
[Fines, Lost Licences & Prison Sentences for Repeat Escape Offenders!]
[Beware of Deformed Mowi Salmon!]
[Nearly 50,000 salmon escaped from storm-damaged fish farm]
[Mass escape from Colonsay fish farm after Storm Brendan]
[Escape calls high energy salmon sites into question]
[74,000 salmon escape Mowi Scotland farm after storm]
[Ecological ‘disaster’ as 74,000 fish escape farm]

[Second big escape in a year at Mowi high-energy site]
[Salmon Eggsclusive: Scotland's 'King of Fish' is Now Viking Not Scottish!]
[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]
[Scottish Salmon's Great Escape]
[Call to jail fish-farm bosses who allow escapes]

A leaked Powerpoint presentation – [‘Non GM Module- GlobalGAP’] - includes:

MOWI

Todays status for GM feed for fish is:

- All fish farmed Salmon in Europe are fed on non-GMO feed.
- Mowi Scotland produces only GM free feed and is currently awaiting certification from GlobalGAP.
- Canada and Chile produce MOWI fish which are fed feed containing some genetically modified ingredients. This is standard practice in these two countries, but Chile also produce non GM feed for European retailers.

GM-regulation

EU regulations:

Only EU approved GM products are allowed.
There is zero tolerance for GM products which are not approved by EU .
Status for Scoland and Norway – no GM products are approved for food or animal food (pork, poultry, aquaculture, milk , cattle etc).

GM-labeling: All food or feed wich is GM, or contains GMO ingredients much be labelled as such

To be certified as GM free:
Producers must prove that the product is GM free. They must also be able to track that all the raw materials (eg feed) and/ or the product itself is GM free. This must be proved by lab analysis, - max level of GM components identified is 0.9% of eh final product.

The level of 0.9 % is set because for various reasons it is technically impossible to prove 0% due to the analysis uncertainty and traces of some GM material can often occur.

Fish fed with GM feed, is not certfied as being Non GM. All Mowi ova are non GM

Example on approved GM:

GMO	Company	Approval	
		Food	Feed
LibertyLink™-beet	Bayer Crop Science		
RoundupReady™-beet	Monsanto		
RoundupReady™-canola (GT200)	Monsanto		
RoundupReady™-canola (GT73)	Monsanto	Oil, FA	Yes
Laurical™-canola	Calgene		
SeedLink™-canola (MS1/RF1)	Bayer Crop Science	(*)	(*)
SeedLink™-canola (MS1/RF2)	Bayer Crop Science	(*)	(*)
SeedLink™-canola (MS8/RF3)	Bayer Crop Science	Oil	Yes
Oxy 235-canola	Bayer Crop Science		
Phytaseed™-canola	BASF		
LibertyLink™-canola (Liberator C/6AC)	Bayer Crop Science		
LibertyLink™-canola (Falcon)	Bayer Crop Science		
LibertyLink™-canola (T45)	Bayer Crop Science		
LibertyLink™-canola (Topas 19/2)	Bayer Crop Science		
LibertyLink™-corn (B16)	DeKalb		
Bt-Xtra™-corn (DBT418)	DeKalb		
Bt11-corn	Syngenta	Yes	Yes
Bt11-sweetcorn	Syngenta	Yes	
Bt176-corn	Syngenta	(*)	(*)
RoundupReady™-corn (GA21)	Monsanto	Yes	
Herculex ™-corn	Dow Agrow Science	Yes	Yes
LibertyLink™-corn (T14)	Bayer Crop Science		
LibertyLink™-corn (T25)	Bayer Crop Science	Yes	Yes
YieldGard Rootworm™-corn (MON863)	Monsanto	Yes	Yes
YieldGard™-corn (MON801)	Monsanto		
YieldGard™-corn (MON802)	Monsanto		
MON809-corn	Pioneer		
MaizeGard™-corn (MON810)	Monsanto	Yes	Yes
RoundupReady™-corn (MON830, ff.)	Monsanto		
SeedLink™-corn (MS3)	Bayer Crop Science		
SeedLink™-corn (MS6)	Bayer Crop Science		
RoundupReady™-corn (NK603)	Monsanto	Yes	Yes
male sterile-corn	Pioneer		
StarLink™-corn (CBH351)	Bayer Crop Science		

Mowi GM policy

Mowi is not totally against GM ingredients in its feed.

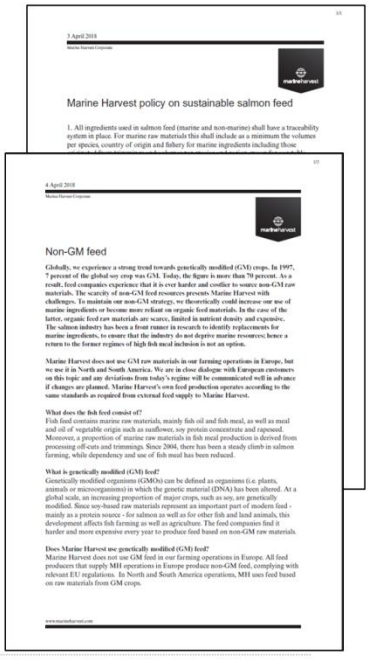
Our salmon in Canada and Chile are fed feed containing some genetically modified raw materials - the most common genetically modified raw material is soy.

Global % GM soy production 1997-2017:

1997 7%

2017 >70%

GM free production in Europe on fish feed will maybe change in the future.
Mowi Scotland feed is non GM. We would only start producing GM feed after agreement has been reached with our customers.



3 April 2018

Marine Harvest policy on sustainable salmon feed

1. All ingredients used in salmon feed (marine and non-marine) shall have a traceability system in place. For marine raw materials this shall include as a minimum the volumes per species, country of origin and fishery for marine ingredients including those

4 April 2018

Non-GM feed

Globally, we experience a strong trend towards genetically modified (GM) crops. In 1997, 7 percent of the global soy crop was GM. Today, the figure is more than 70 percent. As a result, feed companies experience that it is ever harder and costlier to source non-GM raw materials. The scarcity of non-GM feed resources presents Marine Harvest with challenges. To maintain our non-GM strategy, we theoretically could increase our use of marine ingredients or become more reliant on organic feed materials. In the case of the latter, organic feed raw materials are scarce, limited in nutrient density and expensive. The salmon industry has been a front runner in research to identify replacements for marine ingredients, to ensure that the industry do not deprive marine resources; hence a return to the former regimes of high fish meal inclusion is not an option.

Marine Harvest does not use GM raw materials in our farming operations in Europe, but we use it in North and South America. We are in close dialogue with European customers on this topic and any deviations from today's regime will be communicated well in advance if changes are planned. Marine Harvest's own feed production operates according to the same standards as required from external feed supply to Marine Harvest.

What does the fish feed consist of?
Fish feed contains marine raw materials, mainly fish oil and fish meal, as well as meal and oil of vegetable origin such as sunflower, soy protein concentrate and rapeseed. Moreover, a proportion of marine raw materials in fish meal production is derived from processing off-cuts and trimmings. Since 2004, there has been a steady climb in salmon farming, while dependency and use of fish meal has been reduced.

What is genetically modified (GM) feed?
Genetically modified organisms (GMOs) can be defined as organisms (i.e. plants, animals or microorganisms) in which the genetic material (DNA) has been altered. At a global scale, an increasing proportion of major crops, such as soy, are genetically modified. Since soy-based raw materials represent an important part of modern feed - mainly as a protein source - for salmon as well as for other fish and land animals, this development affects fish farming as well as agriculture. The feed companies find it harder and more expensive every year to produce feed based on non-GM raw materials.

Does Marine Harvest use genetically modified (GM) feed?
Marine Harvest does not use GM feed in our farming operations in Europe. All feed producers that supply MH operations in Europe produce non-GM feed, complying with relevant EU regulations. In North and South America operations, MH uses feed based on raw materials from GM crops.

What is GMO?

- GMO means genetically modified organism:
- Organisms where the genes have been artificially modified to give them a new desired trait.
- Genetic modification includes mutation, insertion or deletion of genes.
- An example of where genetic modification is most used:
- To provide resistance to plants against special diseases, insects, and/or boost their productivity.
- The use of GMO is still controversial, and the EU has very strict rules around approving the production, commercialization and use of genetically modified organisms.

What does Non GM certification mean for you as a manager and staff member?

- The Non GM module is an addition to the GlobalGAP standard and all Mowi Scotland sites have GlobalGAP certification and can therefore be certified to the Non GM module.
- The same principles apply to this additional module as with the rest of the GlobalGap Standard : In order to be able to supply GlobalGap certified fish, the broodstock (ova), seawater fish and feed must also be GlobalGap accredited.
- will be no specific changes in your daily work as Mowi Scotland only produce fish that have eaten non GM feed and thus do not need specific systems to differentiate between non GM and GM goods / fish. All ova purchased for Mowi sites are also non GM
- However, it is important that you are aware that as we now embark on this certification, all feed and stock delivered to your site must be GlobalGAP.
- If Mowi Scotland ever needed to buy external (non Mowi Scotland) smolts or Ova, it is very important that production management be made aware of this and that any consequences that this will cause will be considered.

A leaked document – ‘Organic Fish Feed: Kyleakin Mill’ - includes:

MOWI

Organic Fish Feed

Kyleakin mill

November 2022
Quality & Food Safety team

Soil Association

Naturland

CANADA ORGANIC • BIOLOGIQUE CANADA

MOWI

What is new in the world of ‘organic’?

Since we started producing organic feed back in October 2019 the UK has left the European Union (BREXIT) and this has brought about a lot of change and additional work for us:

- Despite being outside the EU we must continue to follow EU Organic Production Regulations (but now have no influence on their evolution or requirements).
- There is new GB organic requirements & regulations.
- Organic labels have been changed to include new information required to export feed to Ireland.
- The third-party external feed store at Foyle Port in Northern Ireland has gained organic approval and operates under our certifications.
- and there are others, but they’re not that interesting!

MOWI

There's more new stuff …..

We continue to be audited by and certified to **Soil Association** and **Naturland** Standards, and recently passed our first audit against the Canadian national organic Standards (known as '**COR**', Canadian Organic Regime). In the Standards we see a couple of big changes and new requirements we must meet;

Firstly, there's increasing focus on **Sustainability** and **Responsible Sourcing** of raw materials. New requirements are set around compliance with internationally established sustainability standards, especially toward fishmeal, fish oil and soya.

Secondly, new and expanded requirements around **Social Responsibility** toward the people who work in the organic production supply chains. These include requirements around human rights, discrimination, employment conditions, collective bargaining, wages, work hours and social benefits.

What is organic feed?

Producing organically means **respecting** the rules and regulations governing all areas of organic production. These are based on a number of key principles, such as:

- prohibition of the use of GMOs,
- no use of industrial solvents or ionising radiation,
- no synthetic additives, such synthetic pigments & synthetic amino acids,
- prohibiting the use of hormones and restricting the use of antibiotics to only when necessary for animal health,
- no use of nanomaterials, for example in packaging.

Throughout the organic production, **respect** of organic integrity is paramount and great care must be taken to prevent contamination by conventional (none organic) products and prohibited substances.

Mowi Feed Kyleakin's Organic Certifications

Since starting organic feed production back in October 2019 we have maintained the organic certifications requested by our customers >> **Soil Association**, **Naturland** and recently, **COR**.

This means we **must** continue to follow all the rules of the **EU organic regulations**, along with the requirements of the Soil Association, Naturland and COR Standards. These we have transferred to our Organic **Procedures**.

To check we are keeping to the rules, we are inspected (audited) annually by Soil Association's Certification Body. They are an EU approved, independent, Certification Body who **certifies** our processes and the organic feeds produced (they inspect all three of our standards).

Without these **certifications**, we can't supply organic feed.

Our organic raw materials

Sourcing organic raw materials is a challenge due to their limited availability, difficult supply chains and the need to meet specific Naturland requirements.

Currently we only have 4 suppliers of certified organic fishmeal/oil and 4 suppliers of certified organic vegetable products (wheat, beans, peas, soya oil & meal, sunflower meal and guar korma meal). All the other raw materials are not organic certified but under EU organic regulations are accepted for use to ensure a nutritionally complete feed.

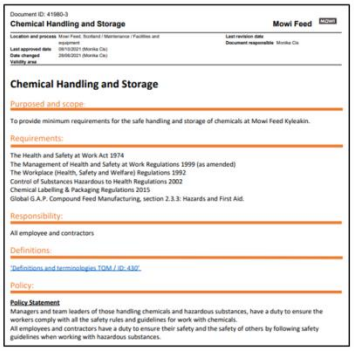
Long name	RM code	Short Name
Fishmeal, organic approved (trimmings, medium protein)	1031	FM ORG MP
Fishmeal, organic approved (trimmings, high protein)	1036	FM ORG HP
Fish oil, organic approved	1182	FO ORG NH (A)
Soya expeller, organic certified	1341	SOY ORG EXP
Sunflower expeller, organic certified	1445	SUNF ORG EXP
Guar korma, organic certified	1484	GUAR ORG KORMA
Soya bean oil, organic certified	1539	SBO ORG
Wheat, whole, organic certified	1610	WHT ORG 10
Peas, whole, organic certified	1710	PEAS ORG WHOLE
Field beans, whole, organic certified	1765	BNZ ORG WHOLE
Vitamin premix, natural antioxidants	1801	V PMX ORG
Vitamin C, monophosphate ester, 35%	1805	VIT C 35%
Vitamin E, 50%	1810	VIT E 50%
Choline chloride, 70%	1815	CHOLINE CL 70%
Mineral premix	1825	MIN PMX (A)
Monoammonium Phosphate	1830	MAP
Monosodium phosphate	1832	MSP
Selenium	1835	SE YEAST
Astaxanthin, Panaferd	1860	AX BACT P
Histidine	1881	L-HIS MONOHCL MONOH2O
Yeast cell wall extract	1900	MOS (A)
Natural tocopherol based antioxidant premix	1976	AOX NAT PMX
Rework from organic feed	1987	RWK ORG OILY
Water	1995	WATER
Organic certified ingredients		**ORG CERT**
Organic approved ingredients		**ORG APP**
Non-organic materials excl. water		NON ORG including water

MOWI

A reminder about chemicals

The Regulations and Standards are explicit about the chemicals we can use in & around our organic mill and also on our feed boats. This covers cleaning products (agents), pest control compounds, process aids etc and includes any chemicals bought on site for use by contractors.

If you are unsure about the suitability of a chemical or are considering purchasing a new chemical, please be sure to check first with QA.



Document ID: 41980-3

Chemical Handling and Storage — **Mowi Feed**

Location and process: Mowi Feed, Northern / Maintenance / Facilities and equipment
Last approved date: 08/10/2021 (Monika Cis)
Date changed: 28/06/2021 (Monika Cis)
Validity area:
Last revision date:
Document responsible: Monika Cis

Chemical Handling and Storage

Purposed and scope:

To provide minimum requirements for the safe handling and storage of chemicals at Mowi Feed Kyleakin.

Requirements:

The Health and Safety at Work Act 1974
The Management of Health and Safety at Work Regulations 1999 (as amended)
The Workplace (Health, Safety and Welfare) Regulations 1992
Control of Substances Hazardous to Health Regulations 2002
Chemical Labelling & Packaging Regulations 2015
Global G.A.P. Compound Feed Manufacturing, section 2.3.3: Hazards and First Aid.

Responsibility:

All employee and contractors

Definitions:

"Definitions and terminologies TQM / ID: 430"

Policy:

Policy Statement
Managers and team leaders of those handling chemicals and hazardous substances, have a duty to ensure the workers comply with all the safety rules and guidelines for work with chemicals.
All employees and contractors have a duty to ensure their safety and the safety of others by following safety guidelines when working with hazardous substances.

MOWI

Lastly, always worth remembering.

So far, over our first three years of organic production things have gone well. Our organic feed production & supply procedures are bedded in. The fish have grow well, although there have been a few pellet physical quality challenges. However, be clear that there will be very serious consequences for Mowi if we get it wrong and organic fish are fed feed that does not comply with organic rules and regulations.

If this were to happen the affected fish would loose their organic status and be downgraded to conventional salmon. This would cause significant financial loss to Mowi and be extremely detrimental to our organic faming operations.

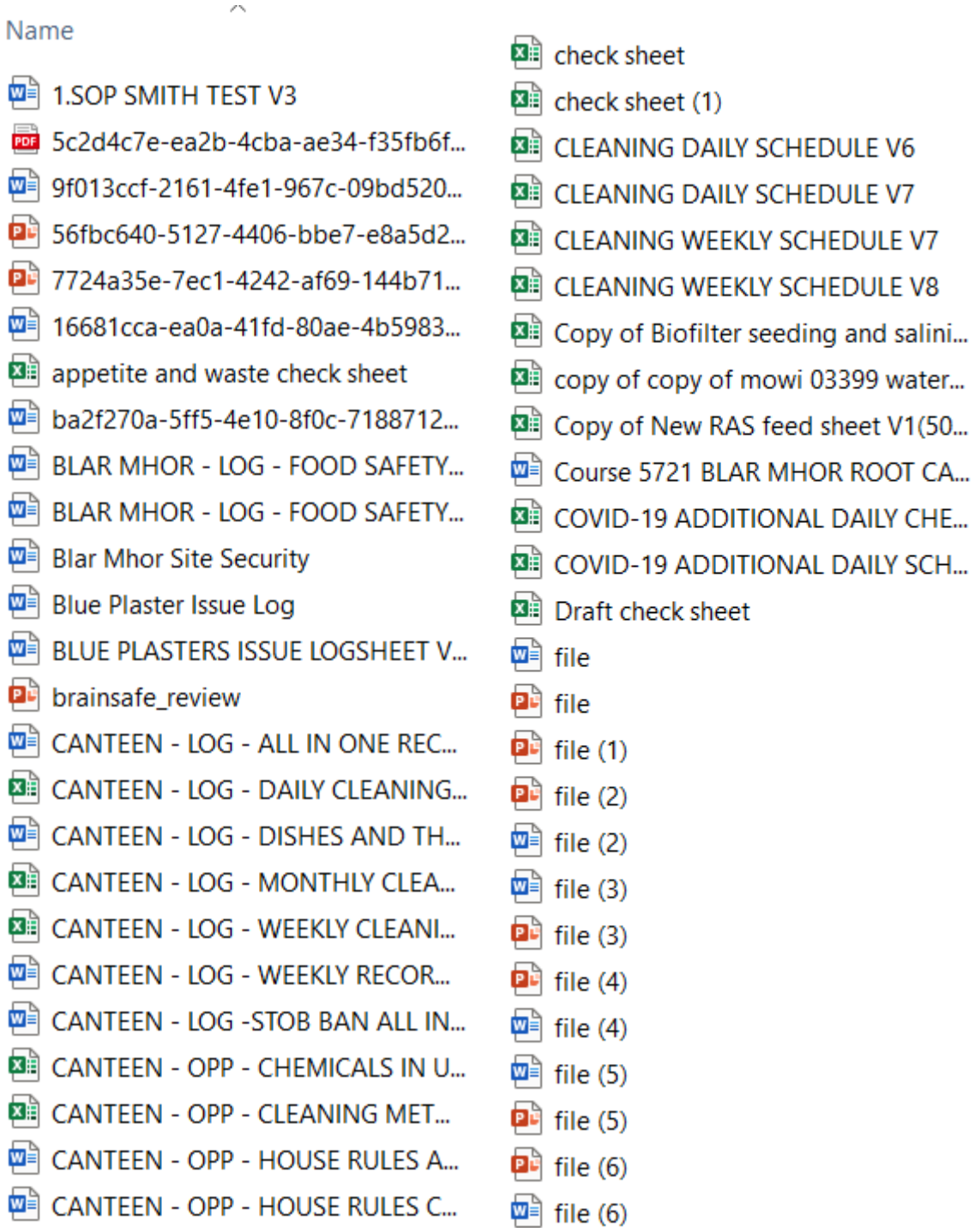
In addition, considerable reputational damage would be done to Mowi as our failing ripples through the industry and beyond.

So please keep up the good work. Follow **procedures** and complete **records** as they are there to help ensure, and evidence, that the correct processes are being done.

MOWI

Notes to Editors:

[1] 399 files were leaked to $camon $cotland on 23 May 2023 – including:



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HCS BULK BIN WASH AREA
HCS CHEMICAL STORE V12
HCS DESPATCH V12
HCS FISH INTAKE AREA V13
HCS FISH PUMP
HCS FISH PUMP V16
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HCS GRADING DELIVERY SECTION ...
HCS GRADING PLATFORM V12
HCS GUTTING HALL

HCS ICE PLANT V13
HCS ICE SLURRY SYSTEMS TANKS
HCS ICE STORAGE AND SUMP ARE...
HCS KTI ICE SYSTEMS CLEANING A...
HCS PACKING HALL V12
HCS PALLETISING AREA V14
HCS RECIRCULATION PUMPS
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LOG CHEMICAL TRIAL V10
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- OPP NIGHT HYGIENE TRAINING V9
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- PRO Grading Standards Written V10
- PRO IDENTIFICATION OF DEAD FIS...
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- SOP BAADER FEEDING V11
- SOP BAADER SADDLES V9
- SOP BAADER TOOL ARMS V8
- SOP BASE SHEET CLEANING
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- SOP CHEMICAL TEST METHODS A...
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- SOP FORK LIFT PRE USE CHECK
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- SOP GOODS DELIVERY
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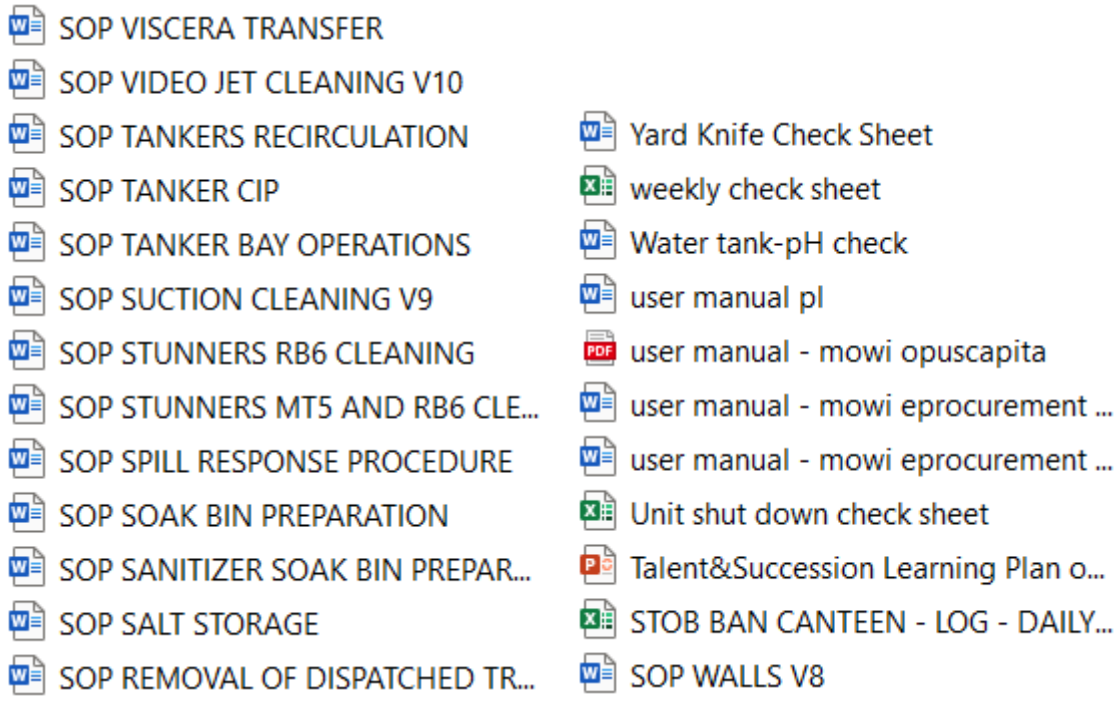
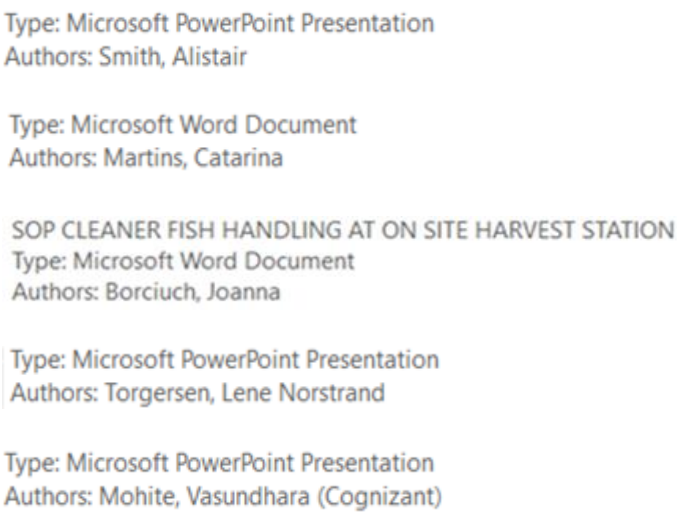


The 399 leaked documents identify various Mowi staff and others as authors – including Alistair Smith, Catarina Martins (Chief Technology & Sustainability Officer), Joanna Borciuch (Polish Translator/Administrator), Lene Norstrand Torgersen (Sustainability Project Manager), Vasundhara Mohite, Per M. Gabrielsen (Plant Manager), Nathan Smith, Ole Kristian Osvik, Norbert Skrzeczkowski (Yard & On Site Supervisor), Odd Medhus (Group Manager Product Quality and Processing), Joanna Peeling (HR Director), Margaret Boyd (worked at Mowi Scotland), Tim Brand, John Richmond (Broodstock and Post-Smolt Development Manager), Janice Andrews, John Clark (Cleaner Fish Production Manager), Blaine Tremblay (Occupational Health and Safety Manager) and Tony Holseter:



Type: Microsoft PowerPoint Presentation
Authors: Gabrielsen, Per M.

Type: Microsoft PowerPoint Presentation
Authors: Nathan Smith

user manual - mowi eprocurement portal 2020
Type: Microsoft Word Document
Authors: Osvik, Ole Kristian

Type: Microsoft Word Document
Authors: Skrzeczkowski, Norbert

56fbc640-5127-4406-bbe7-e8a5d25dbebb
Type: Microsoft PowerPoint Presentation
Authors: Medhus, Odd

Type: Microsoft Word Document
Authors: Peeling, Joanna

COVID-19 ADDITIONAL DAILY SCHEDULE V5
Type: Microsoft Excel Worksheet
Authors: Boyd, Margaret

copy of copy of mowi 03399 water data july 2020 final
Type: Microsoft Excel Worksheet
Authors: Tim Brand

Copy of Biofilter seeding and salinity calculator (Final)(4794)
Type: Microsoft Excel Worksheet
Authors: John Richmond

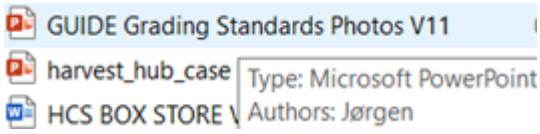
Course 5721 BLAR MHOR ROOT CAUSE ANALYSIS PROCEDURE
Type: Microsoft Word Document
Authors: Andrews, Janice

Type: Microsoft Excel Worksheet
Authors: John Clark

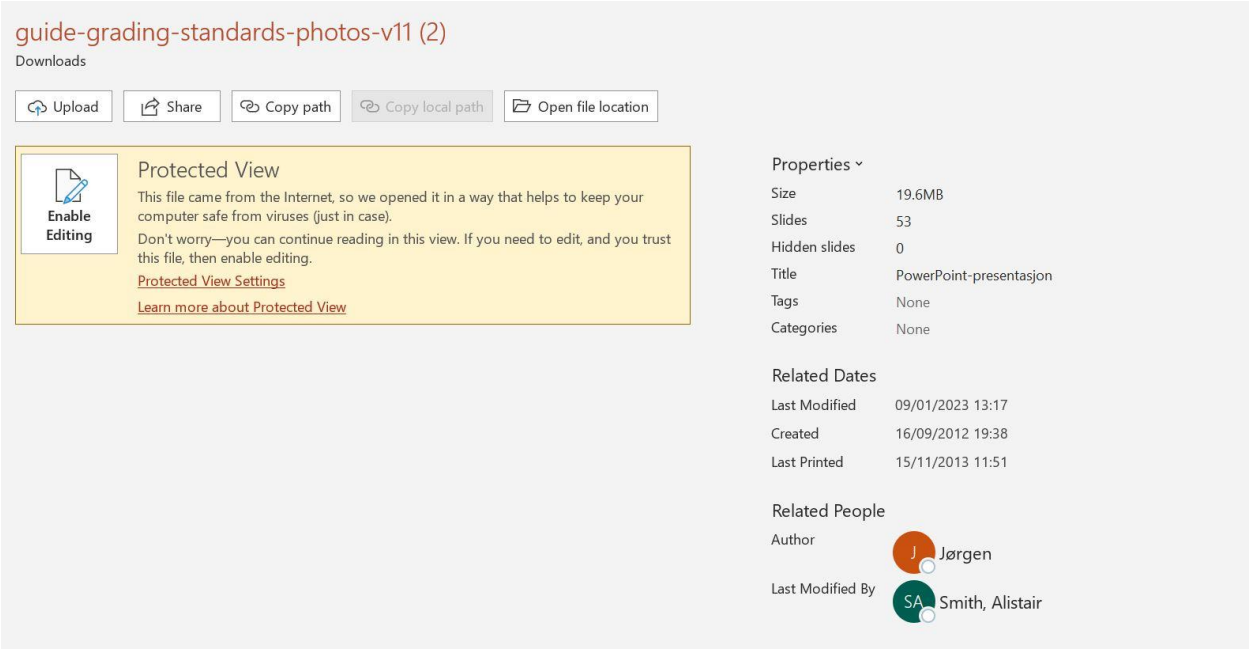
Type: Microsoft PowerPoint Presentation
Authors: Tremblay, Blaine

Type: Microsoft PowerPoint Presentation
Authors: Tony Holseter (Storyboard AS)

The Powerpoint file headed ‘Mowi Grading Standards’ dated January 2023 (saved as ‘GUIDE Grading Standards Photos V11) was authored by Jorgen:



A closer look at the properties of this Powerpoint file reveals that it was first created by Jorgen in September 2012 and last modified by Alistair Smith in January 2023:



Contact:

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

Earlier this month (4 June 2023), $camon $cotland launched a Polish version of the whistleblower advert campaign:

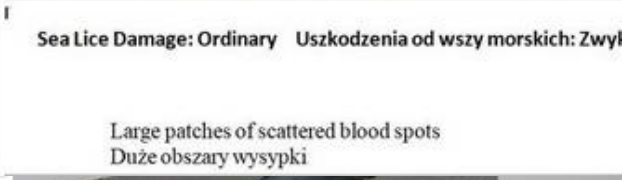
The English version of the whistleblower hotline was launched in May 2023:

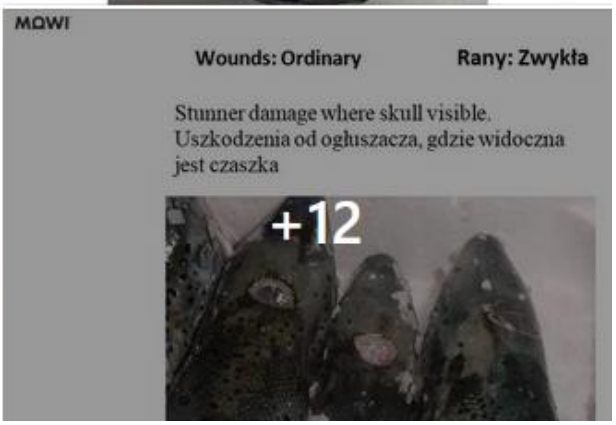
Don Staniford
Just now ·

MowiLeaks: Gruesome photos expose the welfare nightmare of RSPCA Assured, Soil Association 'organic' & ASC - Aquaculture Stewardship Council-certified 'responsible' Scottish Salmon sold by Sainsbury's Tesco Lidl GB Aldi UK Asda and other supermarkets!

Download damming photos via https://donstaniford.typepad.com/.../gruesome-photos...

Please boycott ALL Scottish salmon!





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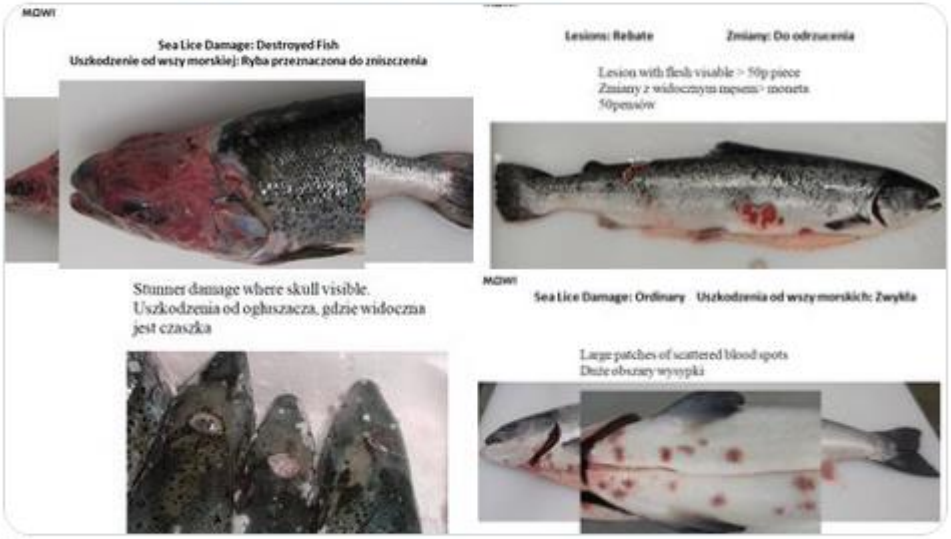
Gruesome Photos: ‘MowiLeaks’ Blows the Whistle on RSPCA Assured Scottish Salmon! @MowiScotlandLtd @rspcaassured @SoilAssociation @ASC_aqua
donstaniford.typepad.com/my-blog/2023/0...



Chris Sherwood and 9 others

8:12 AM · Jun 11, 2023 · **3** Views