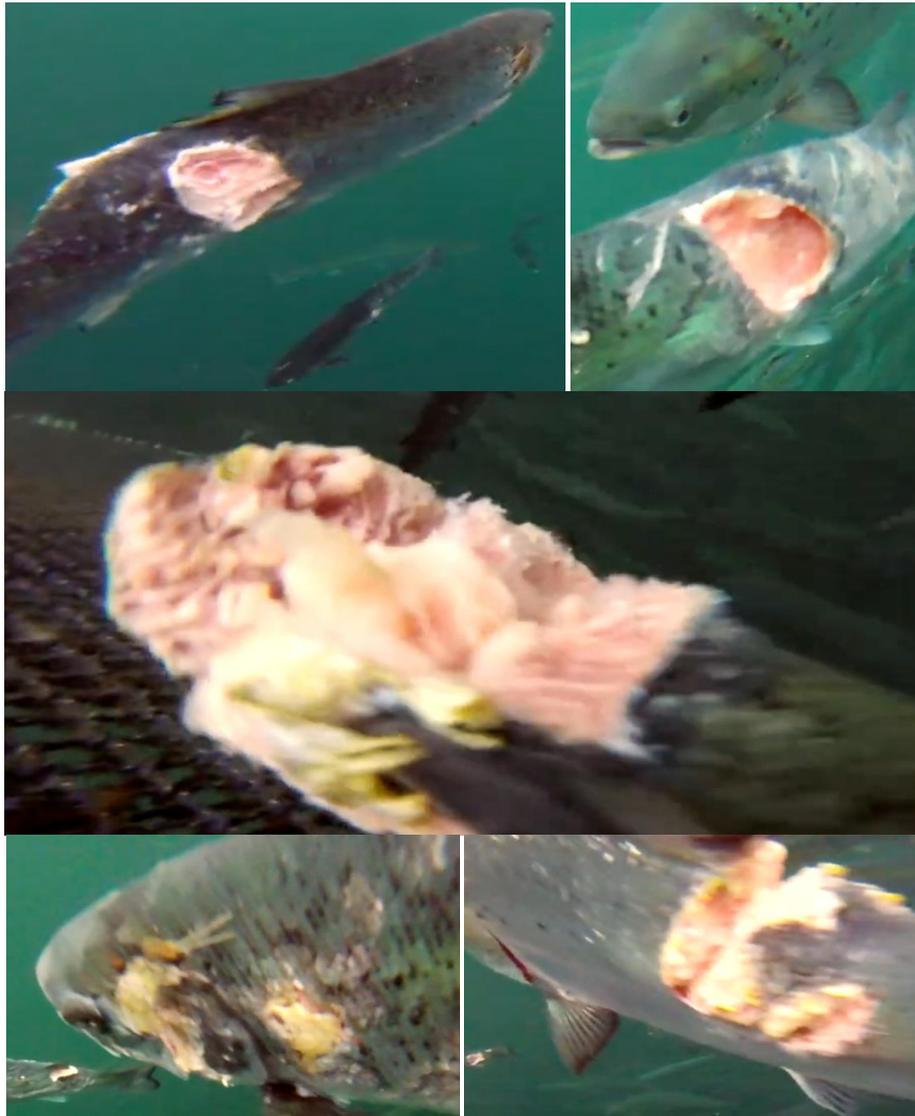


\$camon \$cotland, 30 July 2023

**RSPCA Assured Scottish Salmon is Sealed With a Kiss of Death & Biosecurity Breaches!**

- [Video footage](#) exposes welfare abuse at Bakkafrost's Portree farm off the Isle of Skye
- Complaints filed vs Bakkafrost for welfare, biosecurity and health & safety failures
- Campaigners call for tougher predator nets to protect fish & keep seals out of cages
- Drone footage exposes biosecurity breaches during mortality uplift & transport

[Shocking video footage](#) shot by \$camon \$cotland inside a lice-infested feedlot at Bakkafrost's RSPCA Assured Portree salmon farm off the Isle of Skye has [triggered welfare complaints](#) [1].



The [Norwegian/Faroese-owned company Bakkafrost](#) (formerly called The Scottish Salmon Company) is accused of welfare abuse by failing to install and/or properly maintain anti-predator nets to deter seals at a salmon farm with a [history of mass mortalities off the Isle of Skye](#).

Summary video footage is available online here (click on the graphic):

This video player shows a salmon with a large, open wound on its side. A semi-transparent blue box with the RSPCA logo and the text 'RSPCA ASSURED' is overlaid on the video. The video player interface includes a play button, a progress bar at 03:18, and control icons for volume, settings, and fullscreen. The Vimeo logo is visible in the bottom right corner.

**R\$PCA A\$\$ured Welfare Abuse at Bakkafrost's Portree Salmon Farm off the Isle of Skye**

Don Staniford

03:18

vimeo

This video player shows a close-up of a salmon's head and mouth, which appears to be in distress or being handled roughly. The video player interface includes a play button, a progress bar at 01:00, and control icons for volume, settings, and fullscreen. The Vimeo logo is visible in the bottom right corner.

**Welfare Abuse at Bakkafrost's Portree salmon farm - 28 & 29 June 2023 [Short Version]**

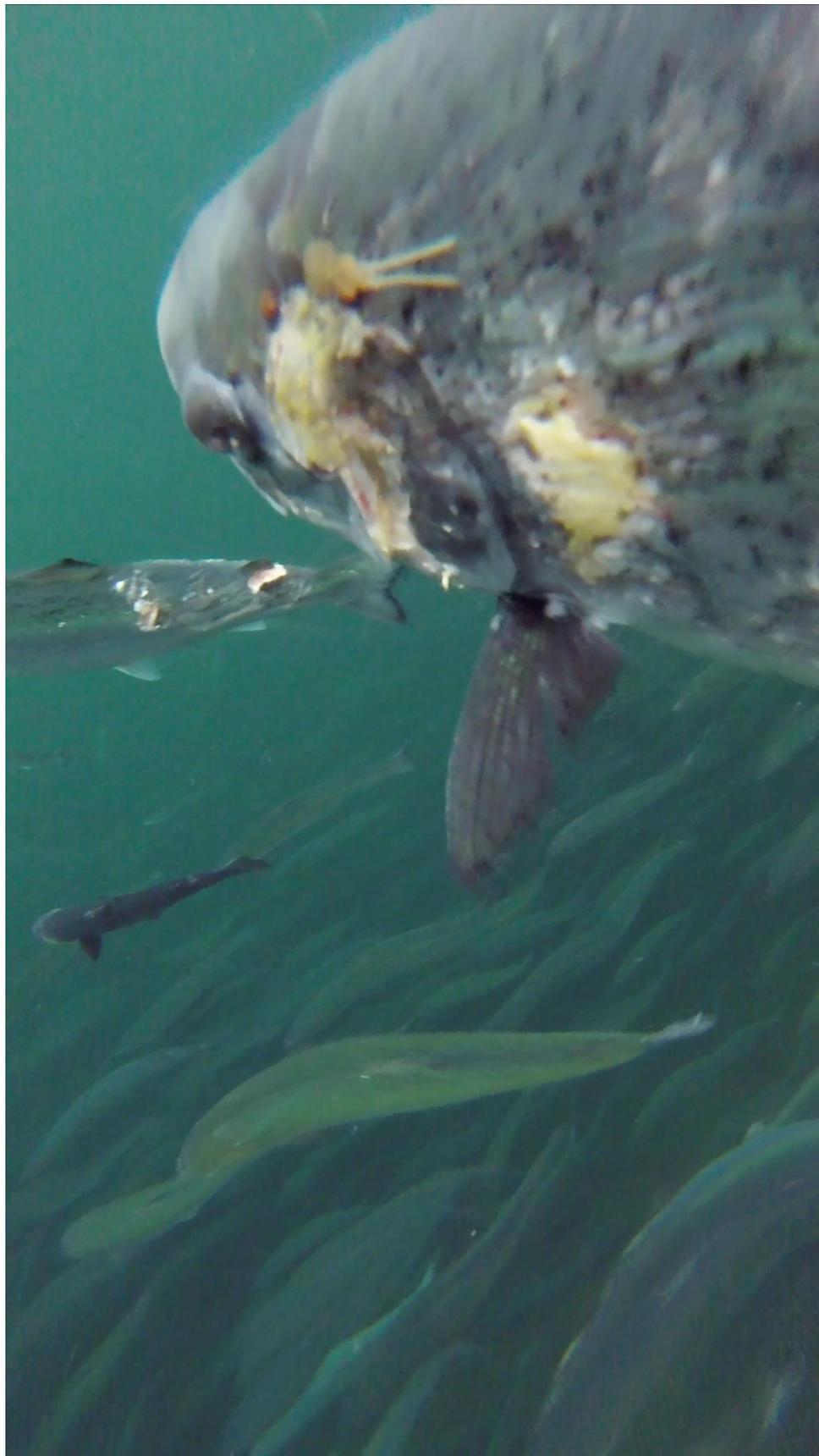
Don Staniford

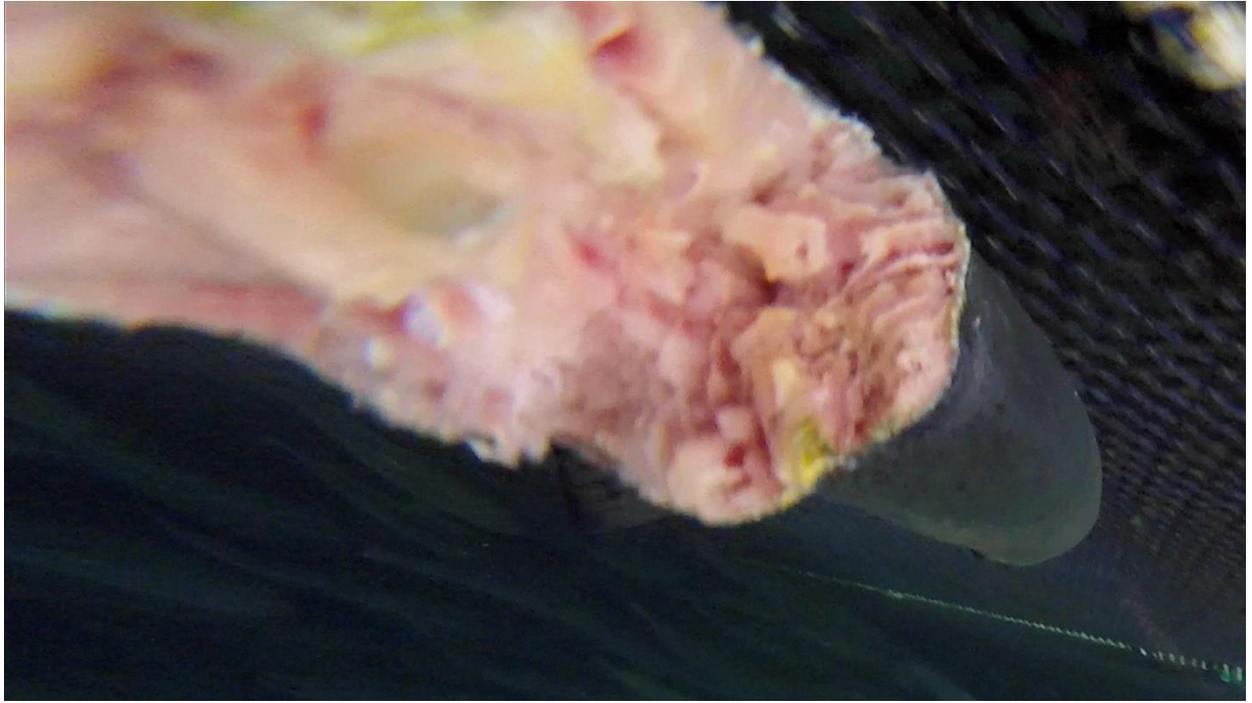
01:00

vimeo

Here's photo stills [sourced from the video footage](#):





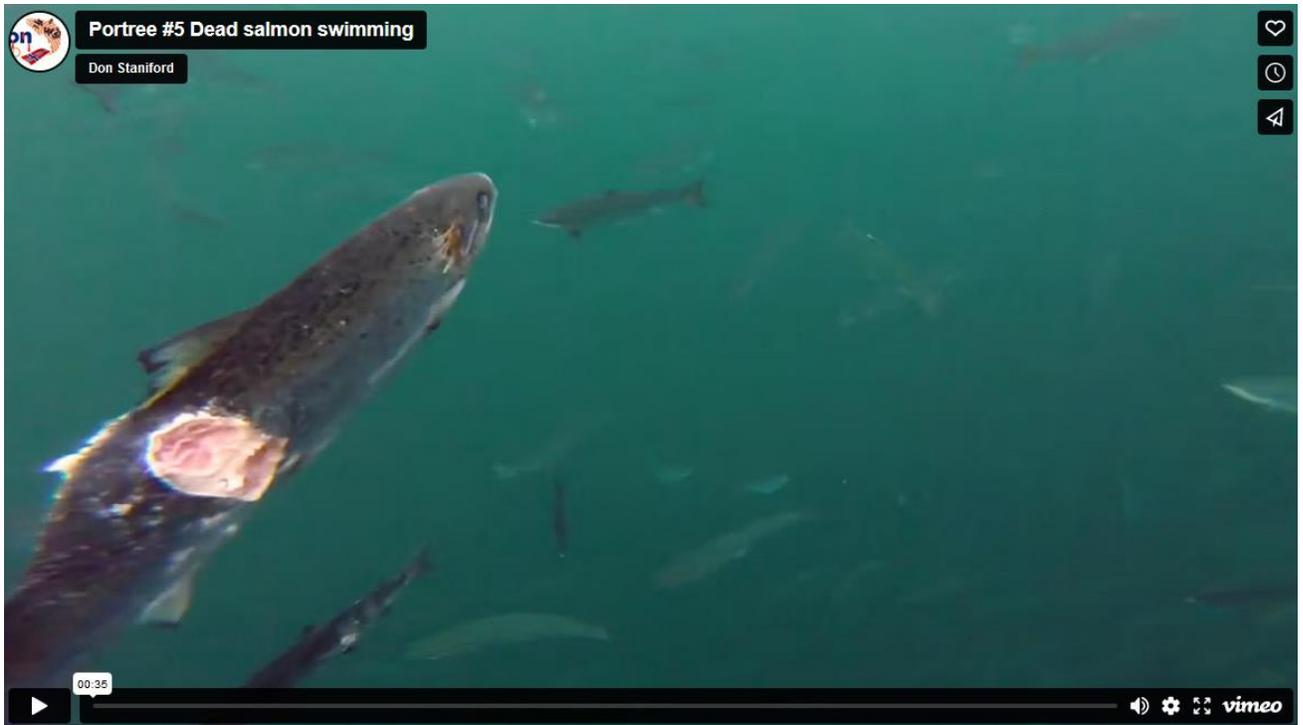




Here's more video footage shot by Don Staniford of \$camon \$cotland inside Bakkafrost's Portree salmon farm on 28 & 29 June 2023 (click on the graphics to play the clips):







[See Appendix below for more unedited video footage shot at the RSPCA Assured Portree salmon farm on 28 & 29 June 2023]

“The horrific injuries inside Bakkafrost’s RSPCA Assured’s Portree salmon farm were the worst I’ve ever witnessed,” said Don Staniford, Director of Scamon Scotland who [kayaked back from filming with an escort of seals](#). “The open wounds and unnecessary suffering of dozens of farmed salmon was so shocking that I visited a second time to check on the welfare nightmare. It beggars belief that RSPCA Assured allows such intolerable cruelty. Bakkafrost has either not installed proper anti-predator netting or they have not properly maintained the equipment – either way this is a clear cut case of welfare abuse. The zombie salmon on show inside the salmon farm are like an X-rated horror film.”



In February 2020, [scientist Dr Lynne Sneddon criticized the RSPCA for supporting salmon farming in Scotland](#). The Sunday Times [revealed that the RSPCA received over £500,000 from salmon farming companies via the RSPCA Assured certification scheme](#).

The [RSPCA’s farmed salmon standards technical advisory group](#) is comprised of a ‘Who’s Who’ of the salmon farming industry including representatives of Bakkafrost, Mowi, Scottish Sea Farms, Cooke, Loch Duart, Organic Sea Harvest, Hendrix Genetics, Pharmaq and Salmon Scotland. The latest version of the [‘RSPCA Welfare Standards for Farmed Atlantic Salmon’](#) (February 2021) condones the killing of seals [2].

“If salmon farms cannot operate securely without breaching welfare legislation then they should be shut down immediately,” continued Staniford [who wrote to RSPCA Assured in October 2022 calling for the end of RSPCA certification of Scottish salmon](#). “By failing to keep out predators, Bakkafrost has failed to protect the health and welfare of the hundreds of thousands of salmon cooped up in the cages. If chicken farmers allowed foxes free entry into hen houses to slaughter their stock the public would be outraged. Now that the killing of seals is banned, salmon farmers have a duty to install anti-predator netting and if that is not enough to keep out ‘gangs’ of seals then it is time to put an end to the misery of salmon farming.”

In February 2021, [the killing of seals was banned by the Scottish Government](#) due to the [costly threat of a US ban on Scottish salmon](#). Despite the ban over two years ago, the illegal killing of

seals has continued with [The Ferret reporting last month](#) on the unlawful killing of a seal in Orkney by Norskott Havbruk (Scottish Sea Farms).

BBC News [reported in January 2021 that more than 52,000 salmon were killed by seals at the Portree salmon farm in an incident on 31 December 2020](#) with [Intrafish reporting that the attacks were carried out by a seal gang](#) [3]. The Scottish Government reported on seal deaths and predation problems at Bakkafrost's Portree salmon farm in 2020/2021 – resulting from a seal entering a cage – which apparently led to the installation of 'SealPro' nets (in addition to seal blinds) after [an escape of 62,828 fish on 31 December 2020](#) [4].

The illegal killing of seals by salmon farms is well documented with [gruesome photos disclosed via Freedom of Information disclosures, wildlife businesses and tourist operators](#).



**Photo: Dead Seals in Body Bags (The Scottish Salmon Company, Miavaig, Vuia Mor salmon farm in Loch Roag) January 2020**

Bakkafrost's Portree salmon farm has been [in the news for all the wrong reasons](#) – with [ongoing legal action](#), [rising costs](#) and media reports over the last year of an 'explosive' and 'toxic' feed barge in [The Daily Record](#), [The Scotsman](#), [The Times](#), [BBC News](#), [Press & Journal](#), [The Mirror](#), [Daily Star](#) and [The Independent](#) following the sinking in November 2021. The Portree salmon farm was [restocked in March 2023](#) with [salvage costs estimated at over £7 million](#).

Earlier this month (17 July 2023), Bakkafrost [issued a profit warning flagging up exceptional mortality in Scotland](#) and “[elevated mortality caused by viral diseases at some marine farming sites](#)”. Last year, Bakkafrost [reported a 10,000 tonne black hole in Scotland due to mass mortalities and disease losses](#).

Bakkafrost Scotland ([known as The Scottish Salmon Company until June 2022](#)) has an appalling history of welfare abuse. In February 2021, [supermarket chains Waitrose and the Co-op stopped sourcing Scottish salmon from Bakkafrost](#) following shocking video footage of welfare abuse captured by Animal Equality [published by The Times](#).

A spokeswoman for Waitrose [told The Scotsman in February 2021](#): “We’re investigating this urgently and are conducting a physical audit at the site in the coming days, and have stopped supply from the site while we do.” A spokesperson for the Co-op said: “Fish welfare is a priority for Co-op and we only take salmon from approved suppliers who meet strict welfare standards. We do not tolerate unacceptable welfare practices for animals within our supply chain and in light of the seriousness of the allegations, supply has been suspended pending the outcome of an investigation.”

In January 2023, [Animal Equality published video footage of mass mortalities at Bakkafrost’s Meall Mhor salmon farm in Loch Fyne](#). In November 2021, [France 5 broadcast video footage shot inside Bakkafrost’s West Strome salmon farm in Loch Carron](#).



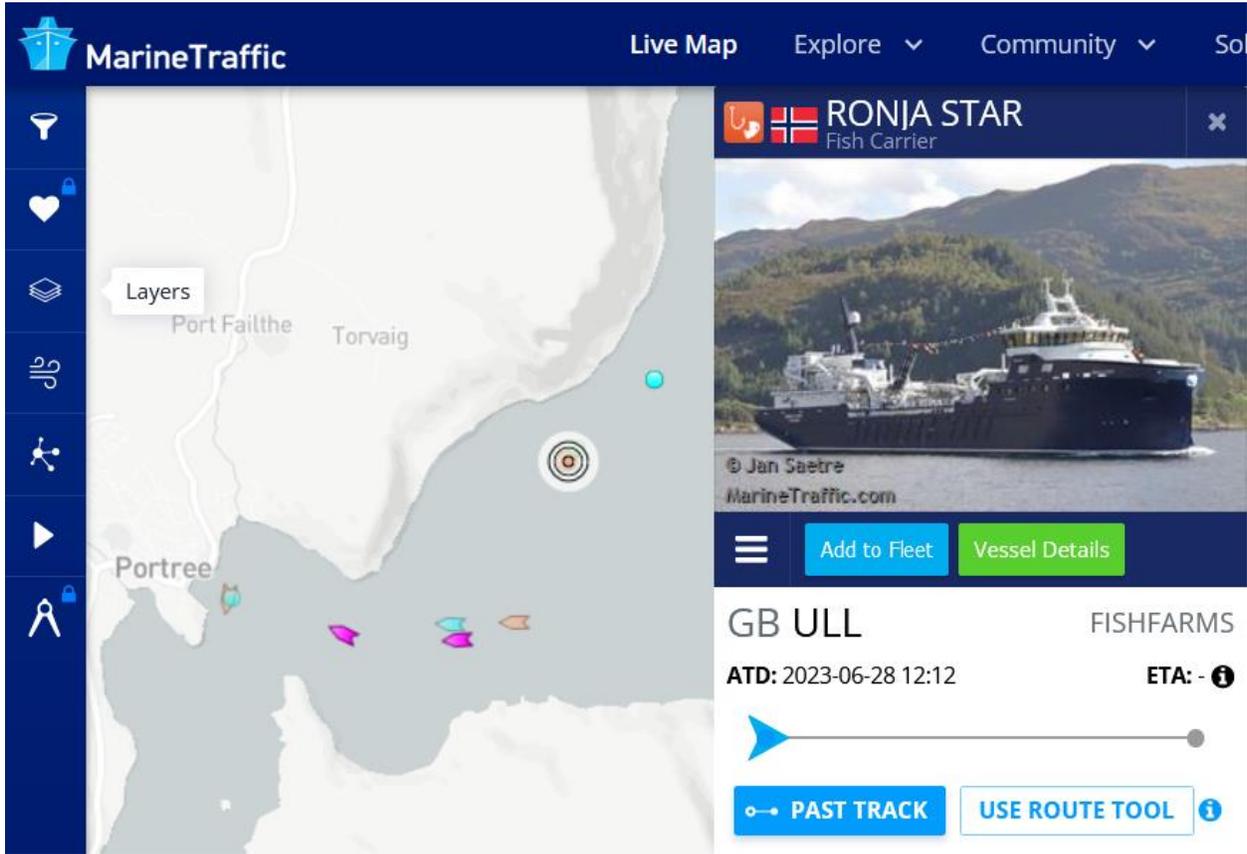
In October 2021, [STV News featured drone footage of mass mortalities at Bakkafrost’s salmon farms off the Isle of Gigha](#). In June 2019, [STV News broadcast video footage of welfare abuse at Bakkafrost’s Aird salmon farm in Loch Shieldaig](#). In September 2018, [the BBC ‘One Show’ featured gruesome video footage of lice-infested salmon suffering at Bakkafrost’s Vacasay salmon farm in Loch Roag on the Isle of Lewis](#).

Video footage exposing welfare abuse and mass mortalities at Bakkafrost Scotland features on [Netflix's 'Seaspiracy'](#) and the [Kate Winslet-narrated 'Eating Our Way to Extinction'](#).

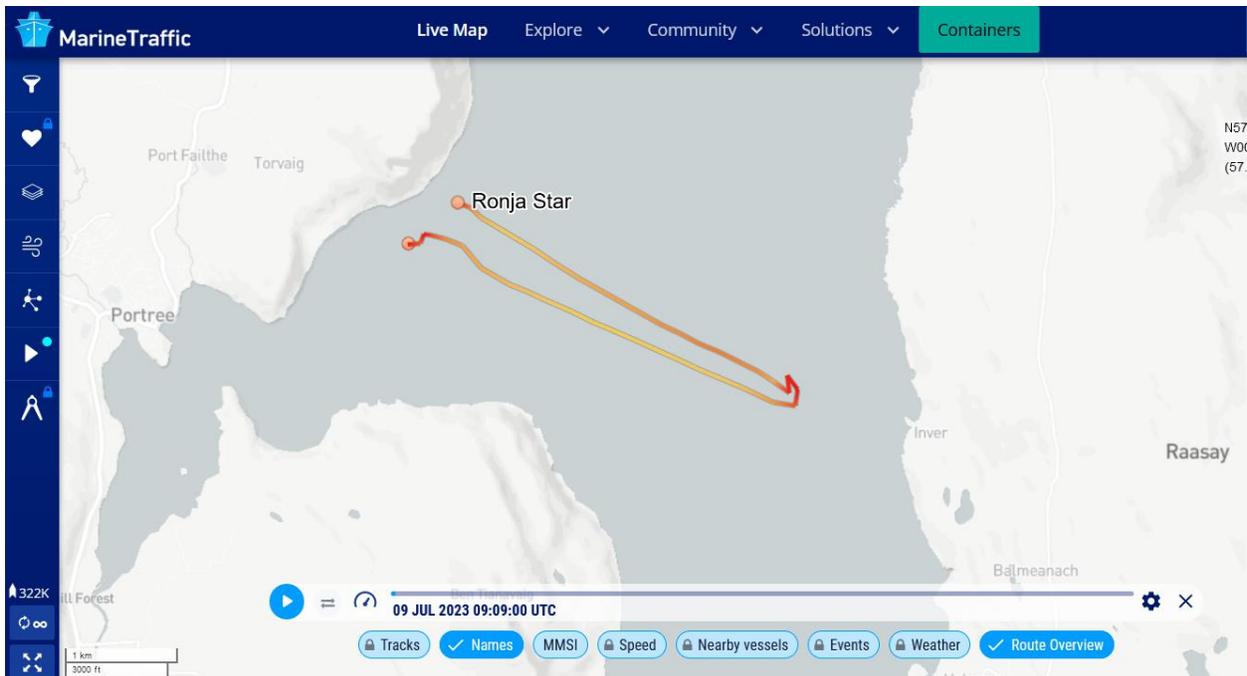
Investigators visited Bakkafrost's Portree salmon farm again on 9 July 2023 with a drone and captured video footage of mortality removal and the Norwegian-registered Ronja Star operating a Hydrolicer machine to remove lice from the farmed salmon [attempts to film inside cages had to be aborted on 5/6 July due to bad weather].



The [Marine Traffic website](https://www.marinetraffic.com) shows the Ronja Star (registered in Norway) operating at Portree salmon farm on 9 July 2023:



The screenshot shows the MarineTraffic website interface. The top navigation bar includes "Live Map", "Explore", "Community", and "Solutions". The main map displays the Portree area with several vessels. A detailed view of the "RONJA STAR" (Fish Carrier) is shown on the right, featuring a photo of the vessel and the name "GB ULL" under the heading "FISHFARMS". The vessel's status is "ATD: 2023-06-28 12:12" and "ETA: -". Below the vessel details, there is a "PAST TRACK" button and a "USE ROUTE TOOL" button. The map on the left shows the coastline with labels for "Port Failthe", "Torvaig", and "Portree".



The screenshot shows the MarineTraffic website interface with the "Containers" tab selected. The main map displays the Portree area with a track for the "Ronja Star" vessel. The track starts near Portree and extends eastwards towards Inver and Raasay. The vessel's name "Ronja Star" is visible on the map. The bottom navigation bar includes "Tracks", "Names", "MMSI", "Speed", "Nearby vessels", "Events", "Weather", and "Route Overview". The time displayed is "09 JUL 2023 09:09:00 UTC". The map also shows labels for "Port Failthe", "Torvaig", "Portree", "Inver", "Raasay", and "Balmeanach".

Here's drone footage from 9 July 2023 showing the [Ronja Star](#) - “the largest well boat in Scottish aquaculture” - operating at Portree (Outer) salmon farm with other workboats including the Toohey II:



[Drone footage](#) shot on 9 July 2023 clearly shows a mort sock – still containing the entrails of dead and diseased farmed salmon – washed in the sea next to Bakkafrost’s Toohy II workboat:



Another [drone video shot on 9 July 2023](#) shows the brail net being put back on the mort sock – still containing remnants of the carcasses of disease-ridden salmon – with potential spillage of the mort wastes into the sea and onto the deck of the boat (it is difficult to see exactly what happens to the morts but the brail net is seen falling between the cage and the Toohey II with the effluent water from the mort sock gushing everywhere):



Bakkafrost's practice of washing mort nets – still containing the disease-ridden carcasses of dead salmon – in the sea appears to be a blatant breach of biosecurity laws. In April 2023, [Scamon Scotland reported on a warning sent to Bakkafrost following a biosecurity breach at West Strome salmon farm in Loch Carron.](#)



The biosecurity warning to Bakkafrost was triggered by [video footage captured in September 2021 by vegan activist Jamie Moyes:](#)



An [email from Charles Allan \(group leader of the Scottish Government's Fish Health Inspectorate at Marine Laboratory in Aberdeen\) in September 2021](#) to another Scottish Government official (name redacted) said: "This footage is worth reviewing, regarding security of the mort recovery operation - it does highlight that there may be some loss of biosecurity".

**From:** Allan C (Charles) (MARLAB) <(REDACTED)@gov.scot>  
**Sent:** 10 September 2021 10:43  
**To:** (REDACTED) (MARLAB) <(REDACTED)@gov.scot>  
**Subject:** FW: Urgent: Welfare Complaint Vs West Strome salmon farm in Loch Carron (The Scottish Salmon Company)

(REDACTED)

This footage is worth reviewing, regarding security of the mort recovery operation – it does highlight that there may be some loss of biosecurity – could you arrange for the arrangements to be checked with the company?

I had a long conversation with the (REDACTED) last night, the loss has been significant, both from primary impact and subsequent controlled removal of additional stocks.

Happy to discuss.

(REDACTED)

(REDACTED)

Marine Scotland | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: (REDACTED)

Mobile: (REDACTED)

[www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)

The Scottish Government [issued a warning letter to Bakkafrost in December 2021](#) regarding a breach of biosecurity at their West Strome salmon farm in Loch Carron in September 2021:

**BREACH OF THE AUTHORISATION CONDITIONS ISSUED  
UNDER REGULATION 6 OF  
THE AQUATIC ANIMAL HEALTH (SCOTLAND) REGULATIONS 2009**

The Scottish Salmon Company (FB0169) is an aquaculture production business (APB) which is authorised to operate under regulation 6 of the Aquatic Animal Health (Scotland) Regulations 2009 (the 2009 Regulations). This authorisation requires the APB to operate following good biosecurity practice to ensure the operation of the business will not lead to an unacceptable risk of spreading disease.

On 10<sup>th</sup> September 2021, the Fish Health Inspectorate were made aware that a breach in biosecurity had occurred during mortality removal operations at the West Strome (FS1342) fish farm site on the 8<sup>th</sup> of September 2021. The breach involved the use of a mortality removal system and a brail net which did not contain all mortalities for appropriate disposal.

Therefore The Scottish Salmon Company has not complied with Condition 8 of the APB authorisation issued on 11<sup>th</sup> August 2021 under regulation 6 of the 2009 Regulations states that, 'In accordance with regulation 6(2)(b) of the 2009 Regulations, the operator of the APB will follow good biosecurity practice at each farm site at which it operates, and must establish, maintain and comply with a biosecurity measures plan containing at least the information specified in paragraphs (a) to (f) of Appendix 4 to this Authorisation. The biosecurity measures plan must be made available by the operator of the APB or any staff engaged by or on behalf of that operator, upon request by an inspector.' A copy of Appendix 4 is attached to this letter.

Here's a copy of Bakkafrost's '[Removal and Movement of Fish Mortalities](#)' document edited on 9 March 2022 (areas highlighted in yellow focus on the biosecurity [failings identified by Jamie Moyes at the West Strome salmon farm in September 2021](#)):

BIO.WKI.17  
Date of Edit: 9.03.2022  
Version: 2



## Removal and Movement of Fish Mortalities

### Purpose

To ensure the correct Biosecurity steps are taken during the removal and disposal of morts. Includes equipment used for transferring morts to a shared mortality collection point where applicable.

### Scope

This procedure will cover the removal, transfer and disposal of morts from a site to its shorebase, and the removal and disposal of morts to a shared mortality collection point (i.e. a shorebase not routinely used by the farm). Applies to all SSC sites (freshwater, broodstock and marine)

### Responsibility and Authority

Site managers, Production Managers, Staff, Biology Dept, Environmental Dept.

### Procedure

It is vital to ensure that all staff are familiar with the Code of Good practice and that biosecurity measures are met. Maximal biosecurity measures should be implemented whilst removing mortalities to reduce environmental impacts, the risk of cross contamination and any impact to the health of remaining fish. PPE used for mortality removal should be restricted to a designated area where appropriate, and strict hygiene policy adhered to at all times. Any failings in biosecurity should be reported and recorded as per company procedure (BIO.SOP.49 Reporting suspected and real breaches of biosecurity & welfare).

**Before removing dead fish, ensure site specific PPE is available and staff are aware of the risks involved. All equipment used should be clean and be in good working order. Only trained staff are to use specialised equipment. Where contracted external staff are to be used in mortality removal, they should also receive appropriate training, and an SSC member of staff should be available to supervise the operations, ensuring that good hygiene practices are maintained throughout.**

Virkon disinfectant is to be mixed with freshwater, to a strength of 1% (75g of product with 10L of freshwater). The mixture will be pink in colouration. Once the disinfectant loses its pink colouration or has a smell of bleach, the solution must be changed, as it is no longer effective. If moving to/from a site with a known pathogen, additional biosecurity measures may need to be implemented and a risk assessment performed for the movement of mortalities. These will be communicated to the vessel crew ahead of movements by SSC site managers/biology.

#### Prior to Loading

- Before the mortality removal vessel enters a new management area, the deck of the vessel is to be cleared of all organic debris (weed, mussels, bait, etc.), and the deck is to be thoroughly sprayed with Virkon (or other suitable broad spectrum disinfectant).
- Mort bins should be visually inspected for damage and sprayed with Virkon
  - Bins with holes or visible damage should not be used
  - All bins must have a securable lid
- Only designated mort bins should be used for fallen stock to minimise the risk of contamination when performing other tasks.
- Adequate numbers of bins should be available to minimise the risk of over filling and/or not having sufficient capacity to remove all carcasses.

#### During Loading

- Before removing mortality ensure that brail net is positioned and secured directly below lift up outlet pipe.
  - Where hard top pipes are in place, the brailer net can be tied/secured to the uplift pipe
  - Where soft/flexible pipe is used, the brailer net must be tied to the handrail to reduce the risk of brail net falling from the pipe

- When net has been appropriately filled all lifting must be over the mid ship of the vessel and not over the bow to eliminate lifting over open water.
- The brail net fully filled should not exceed the capacity of the mortality bin.
- Ensure brail net is positioned over harvest bin for discharge
  - Cod end system ensures that all mortalities are dropped directly into tub below
  - Cod end must not be discharged until brail net is in position, and crane has stopped moving
- Ensure all fallen stock is carefully placed into mort bins and no stock falls outside the bin onto the vessel deck.
  - In event that any carcasses fall outwith the bin, immediate recovery must take place
- Once the mort bin is filled, a lid is placed on the bin and securely fastened. The outside of the bin and the vessel deck will be thoroughly sprayed with Virkon (or other suitable broad spectrum disinfectant).
- Mort bins should never be overfilled and there should be no leaks.

#### After Loading

- All equipment used during the removal and disposal of mortalities should be cleaned and disinfected after use.
- Disinfection records must be maintained and presented upon request.

When unloading mort bins at the shorebase, the same biosecurity measures should be adhered to. Bins should be checked for leaks before unloading starts, and all bins should be unloaded into a designated area, which should be adequately separated from other working areas of the shorebase. Ideally bunding should be in place to minimise the risk of spill. Site specific PPE should be worn in this area, and access restricted where additional biosecurity measures are in place for disease control. Bins should remain closed and contained until either carefully emptied into a closed skip or directly uplifted by an external mortality removal company (see VHWP Part 2 & 3). Once morts are collected, all bins should be cleaned and disinfected before being moved to any other site for mort collection. Records should be kept of disinfection.

It is clear from surveillance of Portree salmon farm on 9 July 2023 that biosecurity protocols and rules are still not being followed by Bakkafrost. In addition to the brail net not fully being emptied into the mort bin and being washed in the sea next to the workboat, video footage shows that mort lids are not even placed on bins during transport let alone securely fastened. [Drone footage](#) shows morts transported between cages by the Toohey II workboat operating at the Portree salmon farm on 9 July 2023 - the lid of the mort bin has not been put on with an open gap directly to the sea with no guard rails or doors blocking spillage:



Moreover, at no point during the surveillance on 9 July 2023 was the use of Virkon disinfectant observed. Nor was the full use of [PPE](#) – for example the wearing of hard hats – visible during the mortality removal and transport process (except for the use of blue gloves and rubber boots):



Other [drone footage](#) shows the mort lid still unsecured on the Toohy II:



[Drone footage](#) clearly shows two Bakkafrost staff working with a heavy crane without hard hats:



\$camon \$cotland is not an expert on health and safety guidelines/protocols but the practice of not wearing hard hats when operating heavy machinery does not appear to be safe or legal.



Bakkafrost is certainly not the only salmon farming company seen to flout biosecurity or health and safety rules. In May 2023, Scamon Scotland [captured Norskott Havbruk \(Scottish Sea Farms\) washing mort bins in the sea and spilling morts on deck](#) near an on-board Masterburn incinerator at Shuna Point salmon farm in Loch Linnhe (but at least the workers operating near a heavy crane were wearing hard hats).



“It is painfully clear that salmon farming is a welfare and biosecurity nightmare,” concluded Staniford who is [injunctioned from going within 15 metres of over 40 salmon farms owned by Norwegian giant Mowi](#). “Surveillance of salmon farms continues to capture endemic welfare abuse inside cages and blatant breaches of biosecurity. It’s not surprising that the \$almafia is desperately trying to keep a lid on the industry’s failings and wants to keep the public and regulators far away. If inspectors persist in allowing this toxic industry to slip through the net then it is up to film-makers, journalists and activists to ground-truth what’s really going on. The Go Pro camera and the drone never lie – unlike salmon farmers.”

**Contact:**

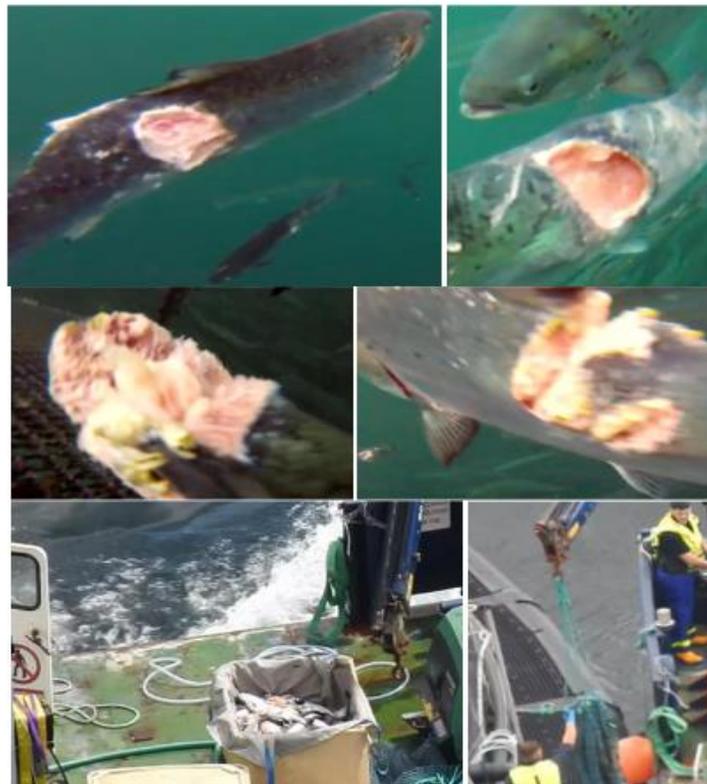
Don Staniford: 07771 541826 ([salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com))

**Notes to Editors:**

[1] \$camon \$cotland [filed complaints on 17 July 2023 with the following agencies:](#)

Animal and Plant Health Agency  
Marine Scotland’s Fish Health Inspectorate (the Scottish Government)  
Police Scotland’s Wildlife Crime Unit  
Highland Council (Trading Standards)  
Health and Safety Executive

**Complaints Vs Bakkafrost’s Portree salmon farm (Isle of Skye): breaches of welfare, biosecurity, and health & safety captured by video evidence in June & July 2023**



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

Date: Mon, Jul 17, 2023 at 7:33 AM

Subject: Welfare Complaint vs Bakkafrost's Portree salmon farm

To: SM-APHA-Enquiries APHA <enquiries@apha.gov.uk>, <APHA.Scotland@apha.gov.uk>

Please find attached a complaint which details video evidence of welfare abuse by Bakkafrost at their Portree salmon farm off the Isle of Skye captured on 28 & 29 June.

Scamom Scotland is of the view that Bakkafrost has breached [Section 19 \(Unnecessary Suffering\)](#) and [Section 24 \(Ensuring Welfare of Animals\)](#) of the [Animal Health and Welfare \(Scotland\) 2006 Act](#). Please judge for yourselves by watching the video footage and by conducting further filming inside the cages.

In terms of [Section 19 \(Unnecessary Suffering\)](#), Scamom Scotland maintains that Bakkafrost knew full well the predation risks at Portree in particular [since the killing of 52,000 farmed salmon by seals in December 2020](#) yet have failed to either install effective anti-predator nets or maintain them properly.

In terms of [Section 24 \(Ensuring Welfare of Animals\)](#), Scamom Scotland maintains that Bakkafrost should have taken reasonable steps to protect farmed salmon from predation.

Bakkafrost's Portree salmon farm was [restocked in March 2023](#) but it is not known if anti-predator nets were installed or if any other seal deterrents were implemented. In any case, it is painfully obvious that the welfare of the hundreds of thousands of Atlantic salmon caged off Portree is being compromised by Bakkafrost's corporate negligence.

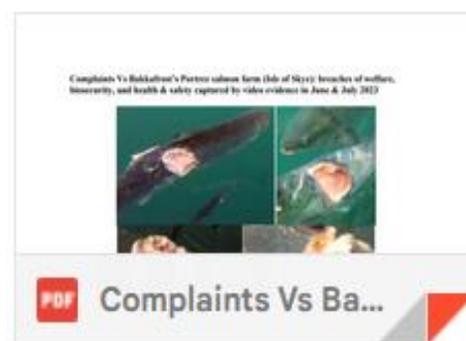
Please provide a receipt for this welfare complaint.

Thanks,

Don Staniford

Director, Scamom Scotland

One attachment • Scanned by Gmail ⓘ



The same welfare complaint - FS-Case-532080320 – was filed with Highland Council's Trading Standards via on [online form](#) on 17 July 2023; and sent via email to Police Scotland's Wildlife Crime Unit via [SCDWildlifeCrime@scotland.pnn.police.uk](mailto:SCDWildlifeCrime@scotland.pnn.police.uk)

The complaint was also forwarded to the RSPCA and RSPCA Assured with this covering email:

From: **Don Staniford** <salmonfarmingkills@gmail.com>  
Date: Mon, Jul 17, 2023 at 10:33 AM  
Subject: Welfare Complaint vs RSPCA Assured Bakkafrost  
To: [hello@rspcaassured.org.uk](mailto:hello@rspcaassured.org.uk), [executive@rspca.org.uk](mailto:executive@rspca.org.uk), [emma.slawinski@rspca.org.uk](mailto:emma.slawinski@rspca.org.uk)

Please find attached a welfare complaint vs RSPCA Assured Bakkafrost.

The site in question is Portree.

Is this particular site RSPCA Assured?

How many of Bakkafrost's salmon farms are accredited via RSPCA Assured?

Thanks,

Don

From: **Don Staniford** <salmonfarmingkills@gmail.com>  
Date: Mon, Jul 17, 2023 at 7:48 AM  
Subject: Complaint vs Bakkafrost's Portree salmon farm  
To: <MS.fishhealth@gov.scot>  
Cc: <directormarinescotland@gov.scot>, <Charles.Allan@gov.scot>, <Neil.Purvis@gov.scot>

Please find attached a complaint detailing video evidence of welfare, biosecurity and health and safety breaches by Bakkafrost at their Portree salmon farm off the Isle of Skye captured on 28 & 29 June and 9 July 2023.

Please provide a receipt for this complaint.

Thanks,

Don Staniford

Director, Scamon Scotland

RSPCA Assured replied:

From: **Artwork RSPCA-Assured** <[artwork@rspcaassured.org.uk](mailto:artwork@rspcaassured.org.uk)>  
Date: Mon, Jul 17, 2023 at 10:36 AM  
Subject: Re: Welfare Complaint vs RSPCA Assured Bakkafrost

To: Don Staniford <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>  
Cc: Hello <[hello@rspcaassured.org.uk](mailto:hello@rspcaassured.org.uk)>, <[executive@rspca.org.uk](mailto:executive@rspca.org.uk)>, <[emma.slawinski@rspca.org.uk](mailto:emma.slawinski@rspca.org.uk)>

Dear Mr Staniford,

Thank you for your email. I have forwarded this to the relevant people to investigate.

Kind regards,

Xenia



RSPCA Assured is the RSPCA's farm assurance and food labelling scheme dedicated to farm animal welfare. [www.rspcaassured.org.uk](http://www.rspcaassured.org.uk)

\*\*\*\*\*  
RSPCA Assured, Registered in England & Wales Registered company no. 2723670.  
Charity registered in England & Wales) 1059879 and Scotland SCO38199.  
Registered office: RSPCA Assured, Parkside, Chart Way, Horsham, West Sussex, RH12 1GY.  
VAT Reg.no. 602 7676 42  
\*\*\*\*\*

The complaint was also sent to the Health & Safety Executive:

From: **Don Staniford** <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>  
Date: Mon, Jul 17, 2023 at 8:57 AM  
Subject: Complaint vs Bakkafrost's Portree salmon farm  
To: <[penny.falconer@hse.gov.uk](mailto:penny.falconer@hse.gov.uk)>

Please find attached video evidence of health and safety breaches by Bakkafrost at their Portree salmon farm off the Isle of Skye captured on 9 July 2023.

Please provide a receipt for this complaint.

One question for the HSE: is there a law/guideline/rule/code of practice re. wearing hard hats on boats when operating cranes to collect and transport mortalities?

If so, could you please provide copies of the relevant documentation.

In addition to the attached video footage showing the non-use of hard hats at Bakkafrost's Portree salmon farm, Scamon Scotland has other video footage from other companies and sites which we can make available to the HSE.

Thanks,

Don Staniford

Director, \$camon \$cotland

One attachment • Scanned by Gmail ⓘ



From: HSE No Reply Accounts <Noreply.accounts@hse.gov.uk>

Date: Mon, Jul 17, 2023 at 11:51 AM

Subject: Health and safety issue received - [Email ID – for HSE use only] CRM:013440549

To: salmonfarmingkills@gmail.com salmonfarmingkills@gmail.com



Get help with health and safety

## Health and safety issue received

Dear Don Staniford

We received your health and safety issue.

Your reference number is CAT-0089684

## What happens next

We may call or email you for more information within 3 working days

We aim to email you within 15 working days (3 weeks) to give you the outcome

The HSE replied on 19 July 2023:

From: **noreplyconcerns** <[noreplyconcerns@hse.gov.uk](mailto:noreplyconcerns@hse.gov.uk)>  
Date: Wed, 19 Jul 2023, 13:56  
Subject: Concerns raised to The Health and Safety Executive  
To: [salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com) <[salmonfarmingkills@gmail.com](mailto:salmonfarmingkills@gmail.com)>

Dear Don Staniford

**HEALTH AND SAFETY AT WORK ETC ACT 1974  
WORKPLACE CONCERN**

You recently contacted the Health and Safety Executive (HSE) with concerns regarding operatives working on a fishing boat not wearing hard hats. The law requires Personal Protective Equipment (PPE) to be worn where those running the business decide it would help to prevent an injury. Thank you for bringing your concerns to HSE's attention but it is not clear from the information you have if there is serious risk of harm caused by PPE not being worn and, on this occasion, we will not take this further. With regard to animal welfare this is not a matter within HSE's jurisdiction.

Thank you for contacting HSE.

*Please note this is a no reply email account and any reply will not be received by HSE.*

Yours sincerely

Customer Services  
Operational Services Division  
Health & Safety Executive, Redgrave Court, Merton Road, Bootle, L20 7HS



**Protecting People and Places**

[www.hse.gov.uk](http://www.hse.gov.uk)

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Follow HSE on [Twitter](https://twitter.com/HelpGBWorkWell), [YouTube](https://www.youtube.com/HelpGBWorkWell), [LinkedIn](https://www.linkedin.com/company/HelpGBWorkWell)

As of 30 July 2023 there have been no formal replies from APHA, Marine Scotland or Highland Council – here are receipts/holding replies:

From: **SM-APHA-ScotlandDutyVet** <ScotlandDutyVet@apha.gov.uk>  
Date: Mon, Jul 17, 2023 at 10:27 AM  
Subject: RE: Welfare Complaint vs Bakkafrost's Portree salmon farm  
To: salmonfarmingkills@gmail.com <salmonfarmingkills@gmail.com>

Good morning Don,

Thank you for your email. I confirm that we have received it and will action as required. Thanks.

Duty vet

From: <MS.FishHealth@gov.scot>  
Date: Mon, Jul 17, 2023 at 10:06 AM  
Subject: RE: Complaint vs Bakkafrost's Portree salmon farm  
To: <salmonfarmingkills@gmail.com>  
Cc: <MS.FishHealth@gov.scot>

Dear Don,

Thank you for your email and can confirm that your email has been received.

We will respond in due course.

Kind regards,  
Duty Inspector

**Duty Inspector, Fish Health Inspectorate, Marine Directorate**  
Scottish Government, Marine Laboratory, 375 Victoria Road, Aberdeen, Ab11 9DB  
T: 0131 244 2500  
E: [ms.fishhealth@gov.scot](mailto:ms.fishhealth@gov.scot)



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**Integrity**



**Inclusivity**



**Innovation**



**Collaboration**



**Kindness**

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[Marine Directorate](#) | [Marine Directorate Blog](#) | [@ScotGovMarine](#) | [Marine Directorate LinkedIn](#)

From: **The Highland Council** <donotreply@highland.gov.uk>  
Date: Mon, Jul 17, 2023 at 7:45 AM  
Subject: Environmental health concern  
To: <salmonfarmingkills@gmail.com>

Case reference: FS-Case-532080320

---

Thank you for contacting The Highland Council.

Your Environmental health concern form has now been submitted.

### Next steps

Your case will be handled within 10 working days. Quote the Case Reference Number if you need to contact us.

---

*Do not reply to this email, it was sent by an unmonitored mailbox.*

[2] The [‘RSPCA Welfare Standards for Farmed Atlantic Salmon’](#) (February 2021) include:

#### **Husbandry practices**

##### **Protection from other animals**

---

**NEW**



**From 1<sup>st</sup> March 2021, the killing of seals by the salmon industry in Scotland will be prohibited by law.**

**The Scottish Parliament has also commissioned a review into the use of acoustic deterrent devices (ADD/ASDs) to be concluded by March 1<sup>st</sup> 2021. This review will inform any decision that the government may make in terms of future plans for legislation regulating the use of these devices. If new legislation comes into force regarding the use of acoustic deterrent devices, the standards may be amended accordingly.**

**NEW**



**The shooting of seals is against the principles of the RSPCA welfare standards.**

**However, at the present time, it is acknowledged that as a last resort only, i.e. when all available non-lethal deterrents have been effectively deployed and the welfare of the fish is being compromised (i.e. they are being attacked), it may be necessary to use a lethal measure to safeguard the welfare of the fish.**

**The RSPCA continues to examine new non-lethal methods of controlling predators around salmon farms and is aiming to reach a position whereby the shooting of seals is never necessary.**

**HP 7.0**

**NEW**

The shooting of seals is not permitted, other than in exceptional circumstances (see i box below) and when all required non-lethal deterrents have been effectively deployed (see relevant Standards below), i.e. as a last resort.

**NEW**



An 'exceptional circumstance' is defined as an unexpected/unforeseen event, such as the unavoidable failure of nets, ADDs/ASDs (Acoustic Deterrent Devices/Acoustic Startle Devices), systems or other equipment used to protect the fish from seals due to extreme weather or human error, and where a seal is found to be in the act of attacking the salmon.

- HP 7.1** **NEW** Humane precautions must be taken to protect salmon from other animals that could cause them harm, including bringing in disease
- HP 7.2** **NEW** The producer must fully detail the methods used to protect the fish from other animals in the Predator Control Plan.
- HP 7.3** **NEW** The primary means of protecting the fish must be through physical exclusion, by denying other animals access to tanks and enclosures.
- HP 7.4** **NEW** Enclosure nets must be fully tensioned and weighted to prevent distortion, taking into account local conditions such as currents, tides flows etc.
- HP 7.5** **NEW** Enclosure nets, including predator top nets, must be checked:
- a) at least weekly, for holes and fouling, and maintained in good order
  - b) daily, for any trapped wild animals, which must be removed without delay from the time that they are first observed.

- HP 7.5.1** **NEW** The following details of all wild animals removed from nets must be recorded:
- a) species
  - b) date removed
  - c) whether the animal was dead or alive on removal.
- HP 7.6** **NEW** All systems and equipment used to protect the fish from other wild animals must be maintained in good working order, and repaired immediately on detecting any damage/malfunction.
- HP 7.7** **NEW** Removal of dead fish must occur at least twice weekly, except when adverse weather conditions mean that this would be dangerous to personnel
- HP 7.8** **NEW** Enclosures must be:
- a) protected using visible top nets that are secured to prevent the ingress of predators into the enclosure
  - b) of a mesh size that does not ensnare birds.
- HP 7.9** **NEW** Predator nets must be considered for deployment at high risk sites during high risk periods, and at other times if there is a risk of attack.
- HP 7.9.1** **NEW** Where predator nets cannot be deployed for animal welfare reasons, the precise nature of the animal welfare reasons must be documented and recorded.

- HP 7.13** **NEW** If the fish have been attacked, they must be checked for signs of any injury as a result of the attack without delay from the time the attack became apparent.
- HP 7.14** **NEW** The producer must be able to demonstrate that all of the procedures leading up to the point of last resort have been mobilised.
- HP 7.15** **NEW** Prior to being shot, the individual seal responsible for attacking the fish on the site must be positively identified.
- HP 7.16** **NEW** All attempts must be made to recover the body of the animal that has been shot, and it must be recorded whether the body was recovered or not.
- HP 7.17** **NEW** Any dead wildlife carcasses must be disposed of in accordance with legal requirements.

- HP 7.18** **NEW** Where it becomes necessary to humanely dispatch a seal as a last resort, the following records must be kept:
- a) Names of all persons with valid firearms certificates who are deemed competent to perform the task
  - b) Details of any bullets used and returned to the ammunition register, if shot by an employee
  - c) Details of any animal that has been shot, including:
    - i) The species
    - ii) The time and date of dispatch
    - iii) The location
    - iv) The reason for the shooting
    - v) The number of fish killed before resorting to the lethal method
    - vi) The number of fish on site
  - d) If an external marksman is used, an employee must be there to record when a shooting takes place.
- HP 7.19** **NEW** For members of a farm assurance scheme, all required details relating to seal shootings must be provided to the scheme in the required format (see Appendix 4) within 72 hours of a shooting having taken place; details must include information relating to HP 7.16.
- NEW**
-  The assurance scheme should review the information relating to HP 7.19 and visit the site to establish further details and inform decisions around compliance.
- HP 7.20** **NEW** After every shooting incident, a review of all predator exclusion procedures must be undertaken and records kept of such reviews.
- HP 7.21** **NEW** All records and documentation relating to the standards in this section must be made available to farm assurance scheme personnel and their representatives on request.

Here's a [copy of the RSPCA's seal-killing form](#):

**Appendix 4**

**RSPCA Assured Salmon Farms – 72 Hour Reporting Form – Seal Cull**

Please fill out this form in full and email to [asales@rspcaassured.co.uk](mailto:asales@rspcaassured.co.uk) and [malcolm.johnstone@rspcaassured.co.uk](mailto:malcolm.johnstone@rspcaassured.co.uk) within 72 hours of the incident.

<b>Membership number</b>	
<b>Site name</b>	
<b>Date &amp; time of shooting</b>	
<b>Farm SG licence number</b>	
<b>Number of seals shot and species (e.g. grey or common seal)</b>	
<b>Number and locations of pens affected</b>	
<b>Total number of pens and fish on site at time of predation</b>	
<b>Number of fish killed before last resort shooting took place, and over what time period?</b>	
<b>Location of shooting</b>	
<b>Reasons for shooting (explain why this was considered a last resort)</b>	
<b>How was it ascertained that the damage to the fish was seal-related?</b>	
<b>How did the site manager decide that a seal damage threshold had been reached?</b>	
<b>Details regarding nets (incl. Predator nets)</b>	
<b>Details regarding ADDs (model, transducer positioning on site etc.)</b>	
<b>Any other relevant comments</b>	
<b>Remedial action to prevent further seal attacks</b>	

Signed for .....by:..... Date: dd/mm/yy

Read more via:

[Open Letter to the RSPCA & ASC - please stop certifying Scottish salmon as "responsibly farmed"!](#)

[Named & Shamed: The Most Deadly Salmon Farms in Scotland \(as greenwashed as "responsible" via RSPCA Assured & the ASC\)!](#)

[Video Exclusive: Secret Filming Exposes Horrific Welfare Abuse Inside RSPCA Assured Scottish Salmon Farms](#)

[Rest Assured - the RSPCA has been captured, co-opted & corrupted by the Salmafia](#)

[Press Release: "Secret Filming Exposes Welfare Abuse at RSPCA Assured Mowi - Campaigners call for Mowi to be fined & RSPCA certification rescinded"](#)

[RSPCA Sponsored Welfare Abuse of Salmon Farms - A Guide to Getting Away with Mass Murder \(Thericide\)!](#)

[Secret Filming Exposes RSPCA 'Abused' Scottish Salmon - Welfare Complaint Filed Against M&S Supplier Scottish Sea Farms](#)

[RSPCA Sponsored Seal Killing Continues Despite US Ban?](#)

[RSPCA in firing line over Marine Harvest's seal-killing spree in Scotland - 118 seals killed by Marine Harvest's RSPCA Assured farms since 2011](#)

[Closing the Net On 'Seal-Friendly' Scottish Salmon - last orders on the RSPCA's abuse of 'last resort' killing of seals?](#)

[RSPCA Assured Seal Killers!](#)

[3] Fish Farming Expert [reported in January 2021](#):



Salmon killed by a seal. More than half a million farmed fish died as a result of seal attacks from May 2019 to May 2020. Photo: SSPO.

## Seal attack causes escape of 52,000 salmon off Skye

A major seal attack on a fish farm off the coast of Skye led to the escape of 52,000 juvenile salmon on December 31, the Scottish Salmon Producers' Organisation (SSPO) said today.

*Editors*

PUBLISHED Thursday 14. January 2021 - 14:31



The fish, with an average weight of 300g, were in a Scottish Salmon Company (SSC) farm at Portree which was due to have anti-predator netting installed this month. The remaining fish at the site will be protected by the new netting from next Monday, January 18.

A spokesperson for SSC, which is owned by Faroese salmon farmer Bakkafrost, said: "Our Portree site has recently been subject to persistent attacks from a large group of seals which, despite our best efforts, caused significant damage to one of our nets. Our staff moved quickly to repair this damage but unfortunately a number of fish escaped.

## Invested substantially

"The health and welfare of our stock is very important and no farmers want to lose their stock. All the members of our team at Portree are extremely disappointed, particularly given they have worked so diligently to maintain an excellent containment record at the site. The incident was reported immediately to Marine Scotland and other stakeholders and we are now working closely with the local fisheries trust to record any sightings and recapture stock wherever possible.

"We take these matters extremely seriously and have invested substantially in measures to ensure containment and deal with predators like seals."

Recent Scottish government actions have reduced the methods available to fish farmers to manage predation including ending of the use of shooting by farmers, a change which will come into effect in full at the end of this month and which was partly prompted by a need to guarantee continued export access to the United States.

A ban on some acoustic deterrent devices (ADDs) is also due to take effect from March, although fish farmers believe this is premature.

Intrafish [reported in January 2021](#):



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[Shrimp](#)

[Aquaculture](#)

[Fisheries](#)

[Markets](#)

[IntraFish](#)



### Seal gang's 'persistent' attacks on Scottish Salmon Company farm spark cries for more deterrence options

The seals ripped open the nets, killed many fish, and sent more than 50,000 farmed salmon scattering.

By [Dominio Welling](#) 

A major seal attack on a fish farm off the coast of Skye belonging to The Scottish Salmon Company (SSC) led to the escape of 52,000 juvenile salmon on Dec. 31, and raises the need for more options to control the mammals, the Scottish Salmon Producers' Organisation (SSPO) said Thursday.



**Number of Norwegian farmed salmon escapes falls dramatically**  
[Read more](#)

The farm, at Portree on Skye, was due to have new anti-predator netting technology installed by the end of January.

All remaining fish at the affected Scottish Salmon Company's Portree farm site will be in new "seal proof" netting by Monday, Jan. 18, it said.

"Our Portree site has recently been subject to persistent attacks from a large group of seals which, despite our best

efforts, caused significant damage to one of our nets," said a spokesperson for SSC, which is owned by Faroese salmon producer Bakkafrost.



**Mowi executive: 'Cyber-bullies' are helping put hundreds of hard-working aquaculture industry families out of work**

"Our staff moved quickly to repair this damage but unfortunately a number of fish escaped."

The incident was reported immediately to Marine Scotland and other stakeholders, and the company is now working closely with the local fisheries trust to record any sightings and recapture stock wherever possible.

"We take these matters extremely seriously and have invested substantially in measures to ensure containment and deal with predators like seals," said the spokesperson.

BBC News [reported in January 2021](#):



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# Thousands of salmon lost in 'major' seal attack

© 14 January 2021

**A Scottish salmon farm lost more than 52,000 juvenile fish in a "major" seal attack on 31 December, it has emerged.**

During the incident seals ripped open nets and killed "many" fish, while others escaped, according to an industry body.

It occurred at a farm based at Portree on Skye managed by The Scottish Salmon Company (SSC).

The business was due to have new anti-predator netting technology installed by the end of this month.

An SSC spokesman said: "Our Portree site has recently been subject to persistent attacks from a large group of seals which, despite our best efforts, caused significant damage to one of our nets.

"Our staff moved quickly to repair this damage but unfortunately a number of fish escaped.

"All the members of our team at Portree are extremely disappointed, particularly given they have worked so diligently to maintain an excellent containment record at the site."



The Scottish Salmon Producers Organisation (SSPO) said predation attacks continued to have a significant impact on fish health and welfare.

It reported that more than 500,000 Scottish farmed salmon died as a result of seal attacks over the year to May 2020.

The fish died either from a physical attack or "indirectly from stress".

## 'Distressing incident'

SSPO chief executive Tavish Scott said: "Salmon farms and seals can co-exist quite happily in the marine environment.

"Seals can, however, inflict vicious and widespread damage on salmon farms, killing significant numbers of fish in each attack.

"This distressing incident shows that our farmers need access to a range of effective tools and measures to deter seal attacks and protect their livestock.

The organisation said recent legislation had reduced the methods available to fish farmers to manage the problem, including a ban on the use of "lethal controls", a change which will come into effect in full at the end of January.

It added: "The SSPO continues to call for Scotland's salmon farmers to have full access to all available effective non-lethal measures if they are to fulfil their statutory duty to protect their fish."

Read more via:

[Seals Blamed as Scapegoats by Bloodthirsty Scottish Salmon!](#)

[Sunday National/The Ferret: "Concerns raised over killing of seal at fish farm"](#)

[Damning Post Mortem Report Exposes Illegal Killing of Seal by M&S supplier](#)

[Letter to Police Scotland re. illegal seal killing by Scottish Sea Farms - please prosecute!](#)

["Loose Bullet Casing" found at Mowi salmon farm - the £10,000 smoking gun to prosecute for illegal killing of seals?](#)

[Killer Photos - Sealed with a Kiss of Death from Scottish Salmon!](#)

[The Ferret: "Police investigate allegation seal was illegally shot by fish farm"](#)

[RSPCA Sponsored Seal Killing Continues Despite US Ban?](#)

[Herald On Sunday: "Scottish M&S supplier blames seals for salmon wounds as RSPCA Assured status is suspended"](#)

[Photo Exclusive: Seals 'Executed' by Scottish Salmon](#)

[The Ferret: "Salmon companies rapped for breaking rules on shooting seals"](#)

[Greedy Salmon Farmers Demand £13 Million Compensation for Seal Attacks!](#)

[Victory Sealed After 50-Year Campaign - But the Battle to Save Marine Mammals from Salmon Farms Continues!](#)

[The Guardian: "Scottish salmon farmers to be banned from shooting seals"](#)

[Photo Gallery: Seals Against Salmon Farms!](#)

[Seal shooting at salmon farms doubles before ban](#)

[4]

The Scottish Government's Fish Health Inspectorate [reported that seals at Portree salmon farm killed 17,239 and 19,640 fish in two 'Mortality Events' in December 2020 and January 2021:](#)

Mortality Event No	Reporting Business Name	Site Name	Date reported	Start Date	End Date	Size of fish	Average weight of affected population	Mortality rate recorded (%)	Explained reasons	Total mortality during event	Additional information
MRT02052	The Scottish Salmon Company	Portree	19/01/2021	28/12/2020	03/01/2020	<750g	450g	1.52	Seals	17239	Fish being transferred into SealPro nets, and some biomass moved off site (West Strome)
MRT02053	The Scottish Salmon Company	Portree	19/01/2021	04/01/2021	10/01/2021	<750g	450g	1.76	Seals	19640	Fish being transferred into SealPro nets, and some biomass moved off site (West Strome)

The Scottish Government's Fish Health Inspectorate reported in January 2021 via [Additional cases 20210004-2021005:](#)

Case No:	2021-0004	Date of visit:	19/01/2021
Time spent on site:	0	Main Inspector:	
Site No:	FS0708	Site Name:	Portree
Business No:	FB0169	Business Name:	The Scottish Salmon Company

**Additional Case Information:**

Fish were moved onto site in September 2020 and were treated with FW during transfer and SLICE 8 weeks post-transfer.

Site did not experience high levels of predation pressure during last cycle with only a handful of seals observed around the site. However, this cycle there has been a significant increase in the local seal population, with around 24-30 individuals observed.

This increasing seal presence has resulted in an increase in seal damage observed across the site. At the end of Wk53 (2020) a seal was observed in Pen 3. The mortalities for that week are attributed to seal damage, with the following week (Wk1 2021) capturing the mortalities caused as a result of the seal entering the pen.

Stock were removed from the affected pen on 05/01/2021 to a different cage, leaving Pen 3 empty.

Site has since replaced all STAR nets on site with SealPro nets on all cages.

Mortalities over the reporting threshold:

25/05/2020 - 1.26% (Plankton blooms attributed to increased PGD on site, combined with mechanical treatment losses)

01/06/2020 - 1.28% (Post treatment losses)

15/06/2020 - 2.69% (Site undergoing following)

28/12/2020 - 1.52% (Seal damage)

04/01/2021 - 1.76% (Seal damage combined with handling losses while fish were being transferred into SealPro nets)

5. Evidence of recent increased/atypical mortalities?	Y
If yes, facility nos/no mortality per facility/no stock per facility/reason:	
Mortality in Wk53 was attributed to increased seal presence around the cages and resulting damage. Seal entered Pen3 at the end of Wk53 causing significant mortalities in Wk1 2021.	

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
1.8. In light of the escape event, has appropriate action been taken to prevent and minimise the risk of further escapes?	High	Y		Affected cage was followed and SealPro nets have since been deployed on all cages. The business contracted an external company to conduct night patrols (between 5pm-8am) to perform visual checks on the cages throughout the night and to try and deter seal activity. The frequency of divers on site increased from once a week/fortnight to every second day until all the SealPro nets had been installed.

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary	
General records 2.1 With regard to each facility, net, screen and mooring at each site, a record should be maintained of:-			CoGP: 4.4.9, 4.4.14, SSI 2,1		
			Facilities	Moorings	Nets
a) The name of the manufacturer	Low	Y	Y	Y	Polar circles manufactured and installed by AKVA in 2014. Cages have not been damaged by predators.
b) Any special adaptations	Low	N/A	N/A	N/A	Moorings manufactured and installed by Gaelforce. All moorings were changed in August 2020 to replace existing moorings which were now 6 years old (as described in SOP).
c) The name of the supplier	Low	Y	Y	Y	STAR nets were on site when the escape incident occurred and were manufactured in December 2018. Nets were sent to Knox in July 2020 for service and repair (this is done prior to each cycle). SealPro nets are now on all cages.

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary	
iv) the outcome of each inspection	High	Y	Y	Y	If any repair work is required by site staff, it is recorded in the site diary and on the inspection checklist.
f) the date and result of each repair, equipment test and antifouling treatment carried out	High	Y	Y	Y	If sub-surface repairs are required, this is noted in the divers reports/ROV reports/net washing reports. When divers were called out to site on 31/12/2020 (the date the seal was observed in Pen3), they reported the following: 15x holes (8x8mesh), 10x (3x4), 2x (30x30), 2x (75x30), 2x (50x30). There is a note on the report to say that all holes were repaired and stitched at the time of inspection.

2.14 Do all nets used on site meet industry standards?	High	Y	CoGP 4.4.17	
2.15 Can the site demonstrate an awareness of the minimum fish size in relation to net size	High	Y	CoGP 4.4.19	SealPro nets have 18mm mesh. If the site takes on smaller than average smolts, they are able to deploy STAR nets (with 15mm mesh) on the inside of the SealPro nets to act as a double barrier to escape.

Point of compliance	Risk level	Satisfactory?	Requirement	Comments and advice given or action taken if necessary
4.4 Does the site suffer from regular or heavy predation?		Y		Previously, this site has not suffered from predation or damage caused by predators. However, this cycle there has been a notable increase in the local seal population which has resulted in increased mortalities from seal damage and an escape as a result of predator damage to nets.
4.5 Are there records of site specific risk assessments ascertaining the risk of predator attack?	Medium	Y	CoGP 4.4.26	
4.6 Are there risk assessments undertaken on a pre-determined frequency?	Low	Y	CoGP 4.4.26	Reviewed every cycle.
4.7 A record of any anti-predator measures undertaken at each site at which fish are farmed including: The type and location of each net, fence and scarer deployed	Medium	Y	SSI, 2,8,a	OTAQ scarers available on site. However the site needs to apply to the local council to operate them. The ADDs are only permitted to be used when the site has a significant seal problem. Approval for their use was granted a few weeks ago and they have been on since (however, site staff have not noticed a significant reduction in seals or damage to fish). Service engineer was on site on 17/01/21 to modify the frequency and volume to increase effectiveness. Now that SealPro nets have been installed on site, the ADDs will be switched off in the coming weeks.
- The use of lethal means by any person involved in operations on the site	Low	Y	SSI, 2,8,b	No seals dispatched to date. Licence permits the dispatch of 2 grey and 1 harbour seal every 2 years.
4.8 Where predator nets are deployed is the advice of Annex 7 considered?	Low	N/A	CoGP 4.4.27	

[REDACTED]  
The Scottish Salmon Company  
1 Smithy Lane  
Lochgilphead  
Argyll  
PA31 8TA  
[REDACTED]

## FISH HEALTH INSPECTORATE VISIT REPORT

### SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS NO	FB0169	DATE OF VISIT	21/01/2021
SITE NO	FS0708	SITE NAME	Portree
INSPECTOR	[REDACTED]	CASE NO	20210004

### ENHANCED CONTAINMENT INSPECTION

An enhanced inspection to ascertain the risk of escape from the fish farm was conducted in accordance with the Aquaculture and Fisheries (Scotland) Act 2007.

#### **b)iii) Inspection of records relating to procedures and risk assessments**

Although the site met the requirement of current Scottish industry best practice, due to the nature of the containment incident reported on 05 January 2021, the following recommendations are made for improvement:

**It is recommended that a documented review is undertaken of the site-specific risk assessment to ascertain the risks of predator attacks in accordance with A Code of Good Practice for Scottish Finfish Aquaculture (CoGP) (Chapter 4, point 4.26).**

**It is also recommended that a documented review should be undertaken and implemented to identify improvements to the equipment in use and farm design to protect the fish from predators in accordance with CoGP (Chapter 5, point 5.8) r**

**It is also recommended that a record of any changes made should be recorded to meet the requirements of schedule 2, section 8(a) and 8(c) of the Fish Farming Businesses (Record Keeping) (Scotland) Order 2008, which requires a record to be kept of any anti-predator measures undertaken, including:**

- details of the type and location of each net, fence and scarer deployed;
- any assessment of risk of escape of fish carried out.

[REDACTED]  
The Scottish Salmon Company  
1 Smithy Lane  
Lochgilphead  
Argyll  
PA31 8TA  
[REDACTED]

## FISH HEALTH INSPECTORATE VISIT REPORT

### SUMMARY FOR INFORMATION OF SITE OPERATOR

<b>BUSINESS No</b>	FB0169	<b>DATE OF VISIT</b>	19/01/2021
<b>SITE No</b>	FS0708	<b>SITE NAME</b>	Portree
<b>INSPECTOR</b>	[REDACTED]	<b>CASE No</b>	20210004

#### Escape Investigation

An escapes investigation was conducted following initial notification on the 5<sup>th</sup> January 2021, of an escape of ~50,000 Atlantic salmon (*Salmo salar*) (MSe311220SAL1).

An enhanced containment inspection was conducted and this report has been issued separately.

Here's the [official report of an escape of 62,828 farmed salmon from Bakkafrost's Portree salmon farm on 31 December 2020](#):

## Fish Escapes

Fish Escape Details		
Escape Id	241	
Operator at Time of Escape	The Scottish Salmon Company	
Escape Water Type	S	
Escape Start Date	31/12/2020	
Escape Start Time	00:00	
Escape End Date	31/12/2020	
Escape Grid Reference	No data available	
Escaped Species	Atlantic Salmon	
Stage	Grower fish (salmon only)	
Age	4.5 month	
Average Weight	400g	
	Initial Notification	Final Notification
Date	05/01/2021	04/02/2021
Number of Fish Escaped	unknown	62,828
Number of Fish Recovered	0	
Escape Reason	Predator - PRD Predator - PRD	

Data supplied by Marine Scotland on 11/06/2023

Site Details	
Site ID	FS0708
Site Name	Portree
Address	8A Lisgarry Place Portree IV51 9BD
Telephone Number	
Date Registered	18/10/1991
Operator	Bakkafrost Scotland
Aquaculture Type	Fish
Water Type	Seawater
Species	Atlantic Salmon, Lump sucker, N/A, Wrasse
Health Surveillance Frequency	Medium
Production reported to Marine Scotland within last 3 years?	Yes
National Grid Reference	NG505441
Easting	150500
Northing	844100
Marine Scotland Management Area	11b - Sound of Raasay, Ainort, Scalpay
Local Authority	Highland
Region	Highland
View on Map	<a href="#">View on map</a>

Data supplied by Marine Scotland on 11/06/2023

The Scottish Government's Fish Health Inspectorate reported in October 2021 via [Case 20210383](#):

Case No:	<input type="text" value="2021-0383"/>	Date of visit:	<input type="text" value="07/10/2021"/>
Time spent on site:	<input type="text" value="5 hours"/>	Main Inspector:	<input type="text" value=""/>
Site No:	<input type="text" value="FS0708"/>	Site Name:	<input type="text" value="Portree"/>
Business No:	<input type="text" value="FB0169"/>	Business Name:	<input type="text" value="The Scottish Salmon Company"/>
Case Types:	1 <input type="checkbox"/> ECI	2 <input type="checkbox"/> SLI	3 <input type="checkbox"/> CNI
	4 <input type="checkbox"/> VMD	5 <input type="checkbox"/> DIA	6 <input type="checkbox"/>
Water Temp (°C):	<input type="text" value="12.7"/>	Thermometer No:	<input type="text" value="T148"/>
		FHI 045 completed	<input type="checkbox"/>
Observations:	Region:	HI	Water type: S
			CoGP MA M-26
Dead/weak/abnormally behaving fish present?	<input type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Clinical signs of disease observed?	<input type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Gross pathology observed?	<input type="checkbox"/>	If yes, see additional information/clinical score sheet.	
Diagnostic samples taken?	<input type="checkbox"/>		

Dec 2020 - seal breached cage 3 at Portree. Replaced all nets with seal pro nets which have stopped seal issues experienced earlier in the cycle. Also seal blinds on nets. ADD on site but not used and would need to seek approval is required.

6. Any other peaks in mortality during period checked?	Y
If yes, detail:	Seal predation in Dec 2020/Jan 2021



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## FISH HEALTH INSPECTORATE VISIT REPORT

### SUMMARY FOR INFORMATION OF SITE OPERATOR

BUSINESS No FB0169  
SITE No FS0708  
CASE No 20210383

DATE OF VISIT 07/10/2021  
SITE NAME Portree  
INSPECTOR [REDACTED]

#### Section 1: Summary

The site was visited following continued reports of elevated mortality levels. During the inspection, a number of lethargic fish were observed and four were removed for further examination and subsequent diagnostic sampling.

Histopathology examination revealed pathology consistent with cardiomyopathy syndrome (CMS) and salmon gill poxvirus. This was confirmed as a sample tested positive for piscine myocarditis virus (PMCV) by qPCR, while three fish were positive for salmon gill poxvirus. Mild hepatic necrosis and very mild gill pathology was also observed.

A sample tested positive for the presence of salmonid alphavirus (SAV).

Due to gill health issues observed on site, samples were also screened for *Paranucleospora theridion* (syn, *Desmozoon lepeophtherii*) and *Neoparamoeba perurans* (the causative agent of amoebic gill disease (AGD)). Samples tested positive for both pathogens.

*Hafnia alvei* was identified as pure heavy growth on the plate taken from kidney material of fish 3. This bacterium is known as a fish pathogen and would have been significant to the health of this individual fish.

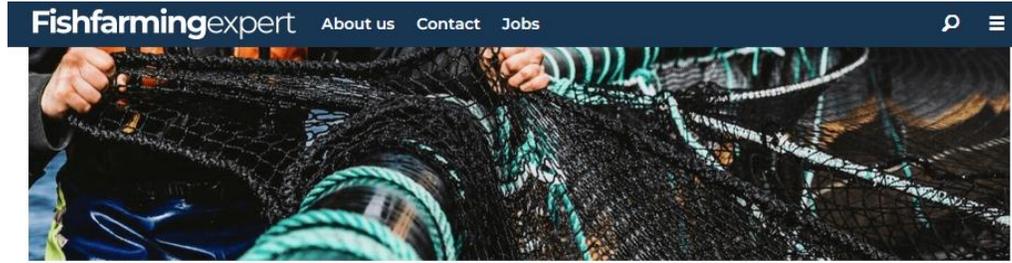
*Aeromonas* sp. and *Vibrio* sp. were isolated, however the level of purity and growth would not suggest these bacteria are implicated as primary pathogens.



The salmon farming industry has claimed that Seal Pro nets keep seals out of cages:

A YouTube video thumbnail. The title is "Keeping farmed salmon and seals safely separate". The video shows a view from a boat looking out at a large body of water with several salmon farming cages. A red play button is overlaid on the video. In the bottom left corner, there is a black box with the text "Watch on YouTube" and the YouTube logo.

Fish Farming Expert [reported in July 2019](#):



Scottish Sea Farms is seeing positive results from a £5.7m investment in anti-seal netting. Photo: SSF.

## Rigid netting helps Scottish Sea Farms cut seal shootings

Scottish Sea Farms has reported a significant reduction in seal shootings following its investment in rigid new pen netting systems which has now surpassed £5.7 million.

*Editors*

PUBLISHED Friday 19. July 2019 - 12:13



In the first six months of the current reporting period (February 2019 – January 2020), SSF shot two seals across its 43 marine farms, a reduction of five compared with the same period last year, six compared with 2017 and seven compared with 2016.

SSF managing director Jim Gallagher said: "We won't be happy until we achieve zero seal deaths, however our multi-million pound investment to roll out protective Seal Pro netting across as many of our farms as possible, as quickly as possible, is another example of our commitment to farm as responsibly and as sustainably as we can.

"Not only do the tougher, more rigid nets help to deter seals, but by protecting our salmon from the stress of predation and the subsequent health challenges that can cause they also contribute to fish welfare."

### Next-generation net

With the optimum time to install the new netting systems being ahead of each new stocking, Scottish Sea Farms has now equipped more than half of its marine farms with Seal Pro nets at a cost of £4.2m, with a further £1.5m worth of nets set to be deployed between August and October 2019, bringing the total investment to date to £5.7m – with more to follow.

In a press release, SSF said the latest roll-out would include the next generation Seal Pro Excel netting which has been engineered to be the strongest, most unyielding version yet offering even greater protection.

Of the two farms where seals were shot in this reporting period, one will be equipped with the new netting ahead of its latest stocking next year, while the other farm has had Seal Pro netting in place for over a year.

### Seals climbing into pens

SSF head of fish health Dr Ralph Bickerdike said: "Seals naturally feed on a variety of wild fish and other marine life and are thought to consume up to 7kg a day, depending on species. In the hunt for food, seals are occasionally relocating from farms that have Seal Pro nets to nearby farms that have previously had no significant seal challenge, hence our drive to protect all farms. We've also seen seals climb up and into pens. Both types of event happened earlier this year, accounting for the two shootings which were carried out under licence."

Scottish Sea Farms (Norskott Havbruk) [report on their website](#):



Our salmon ▾ Sustainability ▾



### Scottish Sea Farms has seen a reduction in the number of seals culled to protect farmed salmon stocks, latest figures show, following ongoing investment in rigid new pen netting.

**LATEST NEWS**

The previously unpublished figures show that the company, which has 45 salmon farms around Scotland's west coast and islands, culled 11 seals under licence at nine farms to protect its salmon stocks during the reporting period 01 February 2018 to 31 January 2019.

This is down 31% and 35% on 2017 (16 seal culls) and 2016 (17 seal culls) respectively.

At the company's seven farms in Orkney, where the new protective Sapphire Seal Pro nets were first trialled in 2016 before being rolled-out, there have been no seal culls in almost three years.

Seal culling is the last resort option taken by farmers to protect the salmon in their care and is carried out under licence only when seals persist beyond all other preventative measures currently being invested in.

Comments Scottish Sea Farms' Head of Fish Health, Ralph Bickerdike: "Our priority has been to install Seal Pro nets at those farms with a historic seal challenge. The speed with which we can do this however, is dictated in large part by nature as there are limited opportunities in the growing cycle where we can install the new nets without risking stress to our salmon. The ideal time is ahead of each new crop."

To date, Seal Pro netting has been installed at 21 farms at a cost in excess of £4.2m, with plans for a further nine farms – specifically those facing a seal challenge – to be equipped in 2019 and 2020 at the start of each new crop cycle.

However, with counts indicating that the seal population in West Scotland has been increasing substantially over the last ten years, and each seal eating between 3-7kg of food per day depending on species, the pressure on available food sources has never been greater.

Says Ralph Bickerdike: "On occasion, we have installed Seal Pro netting at one farm only to see seals relocate to another farm where there had been no prior seal challenge. This, we believe, accounted for five of the 11 seals culled in the last reporting period and is further reason why we will continue to roll-out the new netting until each and every farm is protected."

Scamon Scotland [reported in June 2023](#) on how salmon farms were failing to protect their stock from seals – with the illegal killing of seals still a problem. Information on seals caught inside salmon farms was [published on 2 June 2023 via the Scottish Government's Fish Health Inspectorate](#) - including:

“Seals riding waves over the hand rail to gain access” (Swining Voe, Scottish Sea Farms: May 2023)

“Mortality reported is thought to be caused from a combination of seal predation and treatment loss from a recent mechanical treatment” (Quanterness, Cooke: January 2023)

“Primarily seal attacks (physical damage), some AGD/gill health related (secondary to stress from seals). Notification of mortality following observation of seal in pens. Bad weather suspected as reason for seal to enter pens through security panel above the water line due to abrasion of net on pen structure. Diver and ROV checks followed with no hole being discovered below surface” (Invertote, Organic Sea Harvest: January 2023)

“Post treatment moribunds are being targeted by seals” (Groatay, Mowi: July 2022)

“Seals seem to be targeting fish affected by gill issues” (Grey Horse Channel, Mowi: June 2022)

“Seal predation has increased and CMS confirmed on site” (Bight of Foraness, Scottish Sea Farms: May 2022)

“The majority of the mortality has been attributed to predation and presence of AGD. Site is in the process of changing nets to HDPE nets to try and reduce seal damage” (Grey Horse Channel, Mowi: May 2022)

“Heavy Seal predation. In process of changing over all nets to Seal Pro nets” (Etive 4, Dawnfresh: April 2022)

“Heavy seal predation and the worst affected pens are those with dyneema nets. All mortality removed had seal damage. The site is still in the process of moving over to seal pro nets” (Etive 4, Dawnfresh: March 2022)

“Heavy Seal predation still ongoing. Plans in place to replace all dyneema nets with seal pro nets by the end of April. Seal mortality ongoing” (Etive 4, Dawnfresh: February 2022)

“Site too tidal for predator nets. Cormorant and seal predation on site previous week” (North Voe, Grieg Seafood: January 2022)

“Seal presence around the site is elevated at this time of year. Site is implementing daily mortality removal and ensuring nets are well tensioned to deter seals. SealPro nets are also deployed on site” (Vuia Mor, The Scottish Salmon Company: January 2022)

Previous ‘Mortality Event Reports’ - [published online by the Scottish Government’s Fish Health Inspectorate](#) – included the following cases:

“Contacted company biologist, increase in seal activity around the site, causing some stress. Sgeir Dughall has had seal pro nets installed and the ADD has been adjusted this has caused the seals to migrate to Aird” (Aird, The Scottish Salmon Company: April 2021)

“Kyles Vuia has SealPro nets on site, and so far they are working well. The seals are not accessing the fish, but they are present around the site and were spooking them, causing them to injure themselves. This has reduced in the last week or so, hopefully the seals are realizing they

cannot get to the fish and are starting to clear off. The site, of course, has ADD's and nets are tensioned" (Kyles Vuia, The Scottish Salmon Company: February 2021)

"SealPro nets deployed, mortality occurring from seals spooking fish. DI got in touch with site contact to ascertain what measures will be put in place to reduce the chance of predator damage in the future" (Vuia Mor, The Scottish Salmon Company: February 2021)

"Seals spooking fish, fish burrowing/rubbing against nets" (Vuia Mor, The Scottish Salmon Company: January 2021)

"Fish being transferred into SealPro nets, and some biomass moved off site" (Portree, The Scottish Salmon Company: January 2021)

"6977 fish morts attributed to seal predation. Have seal pro nets on site but not allowed to use ADDs or predator nets due to conservation status of area. 4 seals have been dispatched the last one on 16th April. Since then weekly morts have dropped; 16/3 0.37%, 22/3 0.32%, 13/4 0.38%: last week reported 0.3% mortality for week. 489 were attributed to seal predation but it is hoped this is mainly historic damage" (Wyre, Scottish Sea Farms: April 2020)

"Seal pressure from Kyles of Vuia has shifted to East Loch Roag now that Kyles of Vuia has seal pro nets installed. Plan to install seal pro nets at Taranaish, (5 month waiting time) and in the meantime ADD's are being adjusted constantly, site staff are focusing on mortality removal, and problem seals are being identified for culling" (Taranaish, The Scottish Salmon Company: April 2020)

"Predation due to seals. New ADDs set up on site" (Vuia Mor, The Scottish Salmon Company: July 2019)

"Seal damage: Light were turned off as thought on this occasion that it was attracting seals" (Laura Voe, Scottish Sea Farms: February 2017)

"Seal damage. Last 4 weeks total morts 12678, 12288 attributed to seals. Add's are in place at the site and seal pro nets are being rolled out across the site. Reported as more than 4%" (Laura Voe, Scottish Sea Farms: April 2015)

APPENDIX: UNEDITED VIDEO FOOTAGE

28 June 2023



 **GOPR0939 Bakkafrost kayak approach & mort sock**  
Don Staniford



01:02

▶ 🔊 ⚙️ 🔄 vimeo

This video frame shows a first-person perspective from a kayak on a body of water. In the background, there are several large fishing nets or pens extending into the water. The sky is overcast and grey. The kayak's bow and a yellow paddle are visible in the foreground.

 **GOPR0937 Bakkafrost Portree biosecurity pre kayak**  
Don Staniford

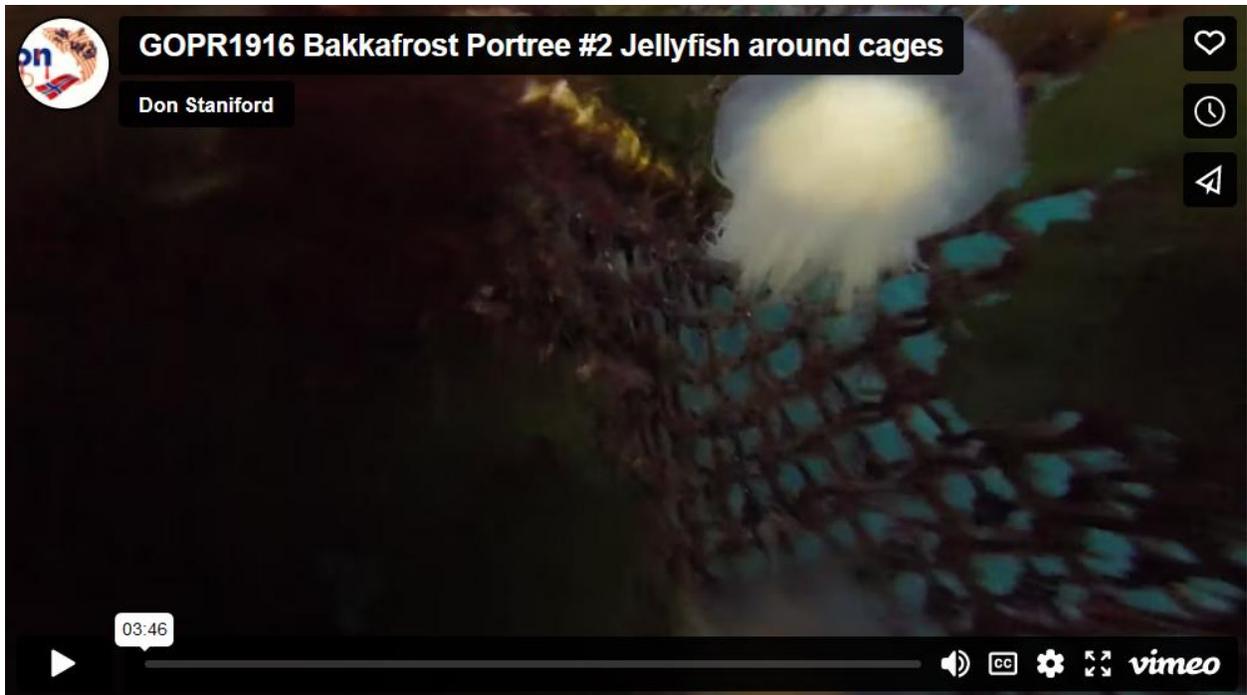
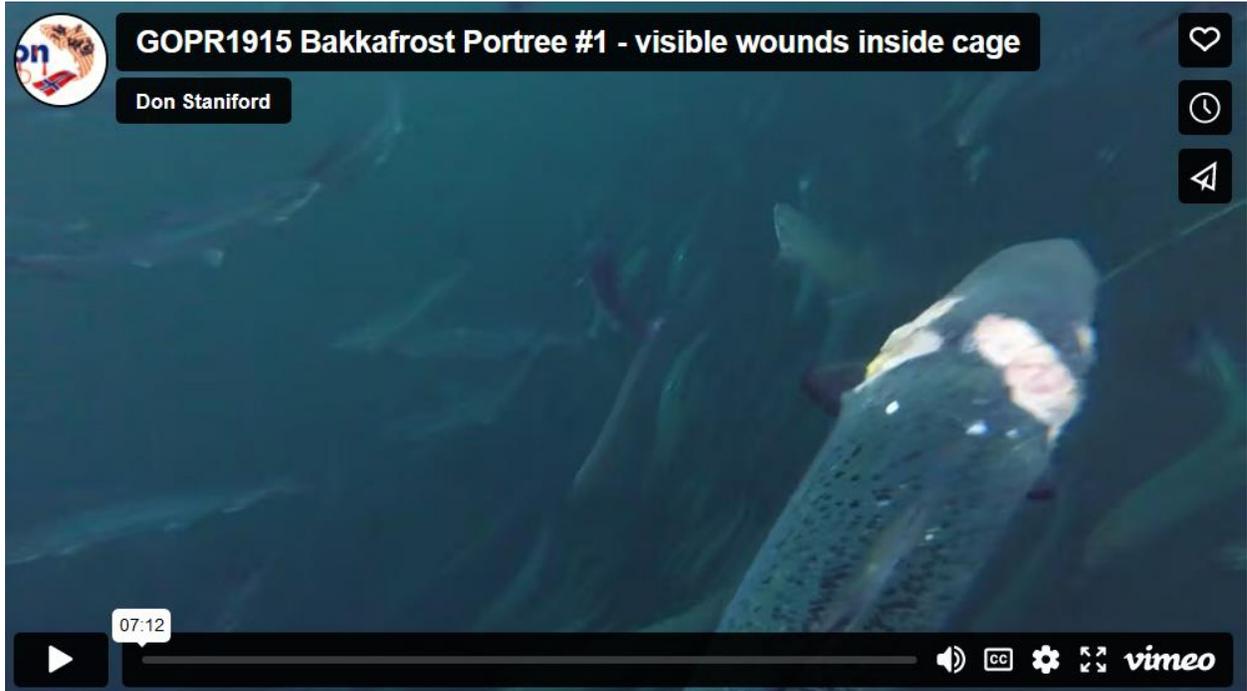


00:35

▶ 🔊 ⚙️ 🔄 vimeo

This video frame shows a man wearing a dark wetsuit, a black helmet with a headlamp, and glasses. He is standing on a grassy bank next to a body of water. In the background, there are trees and a cloudy sky. The water appears calm.

29 June 2023:



 **GP01917 Bakkaforst Portree #3 - open wounds, scratches & chunks of flesh missing**

Don Staniford



12:00

▶ 🔊 CC ⚙️ 🔄 vimeo

This video shows a large fish, likely a salmon, with a significant open wound on its side. The wound is a large, irregular hole with exposed internal organs and a bright, pinkish-red interior. The fish is swimming in clear, blue water, and other fish are visible in the background. The video is presented in a vertical orientation.

 **GP01917 Bakkaforst Portree #3 continued**

Don Staniford



00:44

▶ 🔊 CC ⚙️ 🔄 vimeo

This video shows a fishing net on a boat, likely a salmon boat, at sunset or sunrise. The net is a large, dark mesh structure that dominates the right side of the frame. The background shows a calm sea, a coastline with hills, and a sky with soft, golden light from the setting or rising sun. The video is presented in a vertical orientation.