

Scottish Salmon Watch, 6 September 2020

[Closing the Net on Salmon Farming's Use of Toxic Chemicals](#)

- All is not well with sick Scottish salmon



- **Authorities hide use of toxic chemicals via well boats (data for 2019 still not published)**
 - **SEPA take over regulation from Marine Scotland on 9 November 2020**
 - **Floodgates opened to well boat licences prior to SEPA transfer?**
- **'Scottish Pollutant Release Inventory' for 2019 to be published on 29 September 2020**
 - **Internal email in December 2018 "downplayed" transfer of powers to SEPA in discussion of 'CleanTreat' system (used for the neonicotinoid Imidacloprid)**

Regulatory powers for well boats - used by salmon farms to treat sick fish with toxic chemicals such as Azamethiphos, Deltamethrin and Hydrogen Peroxide - will finally be transferred from Marine Scotland to the Scottish Environment Protection Agency (SEPA) in November. Campaigners are cautiously supportive but called on SEPA and the Scottish Government to come clean on ALL toxic chemicals used by salmon farms in Scotland.

A [Freedom of Information \(FOI\) disclosure by the Scottish Government earlier this week](#) [1] refused to provide details of toxic chemical use via well boats. A [letter from Marine Scotland dated 31 August 2020](#) (FOI-2020-00058631) stated that data for 2019 should be completed by the end of September and data for 2020 "within the first half of 2021":

We do not yet hold completed Discharge Returns for 2019 or 2020.

The Discharge Returns for 2019 should be completed by the end of September 2020. The Discharge Returns for 2020 should be completed within the first half of 2021.

The annual Discharge Return data is published each year by the Scottish Environment Protection Agency (SEPA). The 'Scottish Pollutant Release Inventory' (SPRI) 2019 will be published on 29 September 2020 at 09:30.

However, neither the ['Scottish Pollutant Release Inventory'](#) nor ['Scotland's Aquaculture'](#) database includes data on the use of the [carcinogenic chemical Formaldehyde](#) ([subject of a 10,000 person petition to the Cabinet Secretary for the Environment](#)); antibiotics such as Oxytetracycline, Florfenicol, Amoxicillin and Fenbendazole (only [accessible via FOI requests](#)); or Hydrogen peroxide (again [only accessed via FOI requests](#) - a chemical which has been shown by [recent scientific research to be lethal to seaweed](#) and [shellfish such as shrimp](#)).

Last week (28 August 2020), the [Marine Licensing \(Exempted Activities\) \(Scottish Inshore Region\) Amendment Order 2020 \(SSI 2020/draft\)](#) was laid before the Scottish Parliament and [posted online this week](#).

2020 No.

ENVIRONMENTAL PROTECTION

LICENSING (MARINE)

**The Marine Licensing (Exempted Activities) (Scottish Inshore Region) Amendment
Order 2020**

Made

2020

Coming into force

9th November 2020

A [Policy Note](#) from Marine Scotland dated August 2020 explains:

POLICY NOTE

**THE MARINE LICENSING (EXEMPTED ACTIVITIES) (SCOTTISH INSHORE
REGION) AMENDMENT ORDER 2020**

SSI 2020/XXX

The Marine Licensing (Exempted Activities) (Scottish Inshore Region) Amendment Order 2020 is being made by the Scottish Ministers in exercise of the powers conferred by section 32(1) of the Marine (Scotland) Act 2010 (“the 2010 Act”). The instrument is subject to the affirmative procedure.

Purpose of the instrument

The purpose of this SSI is to transfer regulation of the discharge of treatment waters from wellboats from the marine licensing system under the 2010 Act to the CAR licensing system operated by SEPA.

Policy Objectives

Wellboats are vessels used for the transportation or temporary containment of live or dead farmed fish. They contain a tank (the well) of seawater within which the fish are held. One of their main uses is the treatment of farmed fish for diseases and parasites. This is done by diluting medicinal chemicals in the tank of seawater and then introducing the fish into the tank for a short period of time. The seawater and any residual medicines (“treatment waters”) are subsequently discharged into the sea next to the fish farm.

And:

Implications of this Order

Once this Order comes into force, wellboat operators will require to hold a CAR licence for the discharge of treatment waters from wellboats.

Existing marine licences for this activity will become deemed CAR licences on the “relevant date”. For the majority of marine licences the “relevant date” will be 30 November 2020, unless transitional provisions apply.

New applications for a licence for the discharge of treatment waters from wellboats will be made to SEPA, and any necessary conditions of those operations will be incorporated into the operator’s CAR licence.

The Order contains a number of transitional and saving provisions that ensure that any administrative or judicial processes that are on-going when the Order comes into force are concluded under existing law. For example, an application for a marine licence made prior to the Order coming into force will be processed by Marine Scotland for the Scottish Ministers, and will become a deemed CAR licence when granted. Any variation, suspension or revocation procedures that have been commenced in relation to a marine licence will be completed by Marine Scotland. Any ongoing appeal proceedings will continue to be subject to the provisions of the 2010 Act and the Marine Licensing Appeals (Scotland) Regulations 2011. Marine licences subject to transitional provisions will become deemed CAR licences once those procedures are complete.

Any inquiries, enforcement proceedings, civil sanctions or criminal proceedings arising from events taking place prior to a marine licence becoming a deemed CAR licence will be governed by the 2010 Act.

The ['Policy Note'](#) details consultation with Scottish Ministers, the salmon farming industry and SEPA but there was no public consultation.

Consultation

There is a statutory consultation requirement to consult such persons as the Scottish Ministers consider appropriate on the proposed Order. We consulted the Aquaculture (finfish) sector on the proposals, including the proposed transitional arrangements, and they welcomed the proposed approach. We also consulted at some length with SEPA, as the future regulator, both on the underlying policy and on a draft of the proposed Order. SEPA provided feedback at both stages, which was taken on board and influenced the final draft of the Order.

According to the ['Scottish Statutory Instrument Tracker Report'](#) (31 August 2020), the order has been allocated to the Environment, Climate Change & Land Reform Committee with a report due on 6 October 2020 and the legislation expected to be enacted on 9 November 2020.

Monday 31 August 2020

Scottish Statutory Instrument Tracker Report

SSI Number	SSI Title	Date Laid	Procedure	DPLR					Name
				20 Day Date	Report Due Date	First Meeting Date	Committee Decision	Report Number	
2020/draft	Marine Licensing (Exempted Activities) (Scottish Inshore Region) Amendment Order 2020	28/08	Draft Affirmative	16/09	16/09	08/09			ECCLR

Progress of Subordinate Legislation 01/09/2020

Lead committee approval by 6 October 2020

[Marine Licensing \(Exempted Activities\) \(Scottish Inshore Region\) Amendment Order 2020 \(SSI 2020/draft\)](#) (28 August 2020) (Environment, Climate Change and Land Reform Committee)

The update included:

Legislative approach

It is proposed that this transfer will be achieved by means of an amendment to the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011. Detailed drafting is still under development, but the mechanism for achieving this is that the discharge of any substance carried on in the course of the propagation or cultivation of fish, will be exempt from marine licensing. This will include both chemical substances and organic matter discharged as part of the normal operations of well boats.

That means that such discharges will in future fall within the scope of CAR in exactly the same way that discharges of bath treatments currently fall within the scope of CAR, as activities liable to cause pollution of the water environment. Any necessary conditions relating to discharges from well boats will be included within a CAR licence.

Transfer of conditions from marine licensing to CAR

With the exception of licences that are subject to transitional provisions, marine licences will transfer to the CAR regime, and accordingly discharges from well boats will be governed by the CAR regime from the date on which the legal instrument comes into force.

And:

Transitional provisions

A different approach is required for those licences where an administrative process is underway at the date on which the legal instrument comes into force. In the interests of transparency and simplicity, we believe that a clean handover from one regulator to another at the point of transfer is essential. In practice this means that any procedure which has commenced under the 2010 Act will be concluded before the licence is transferred to CAR.

For example, an application for a marine licence made prior to the transfer date will be determined by Scottish Ministers under the provisions of the 2010 Act. If granted, the licence would become a 'deemed' CAR licence from the date of its granting.

It seems that the Scottish Salmon Producers Organisation - the lobby group promoting toxic salmon farming - was briefed even before the Cabinet Secretary:

From: [Redacted]
Sent: 18 June 2020 17:03
To: [Redacted] scottishsalmon.co.uk'
Cc: [Redacted] sepa.org.uk);
Subject: Transferring well-boat licensing from Marine Scotland to SEPA
Attachments: Wellboats - transfer to CAR - discussion paper.docx

Hi [Redacted]

As you are aware an exercise to transfer responsibility for well-boat discharge authorisations from Marine Scotland to SEPA has been mooted several times over recent years. Within SG we have now secured the policy and legal resource to take this forward as soon as the due legal and Parliamentary processes allow. The current aim is to finalise the draft SSI by the end of August, with it coming into force in November.

We have made good progress in identifying the necessary transitional arrangements. We are now at a stage when we can share that thinking with the industry, and discuss how this might work in practice to make sure we have considered all likely eventualities. With that in mind, I attach a short paper that sets out how we expect the transition to take effect. I would be grateful if you could circulate this to your member companies, and we would be happy to talk through any initial feedback or queries you might have at the next regulators meeting on 30 June. We can explore at that point what further discussion/ engagement may be appropriate.

Regards
[Redacted]

A letter dated 22 June 2020 to the Cabinet Secretary for the Environment, Climate Change and Land Reform recommend against public consultation:

Consultation and stakeholder interests

10. The 2010 Act requires that the Scottish Ministers consult such persons as they consider appropriate in relation to the proposed Order. As this is primarily a procedural exercise, with no wider policy considerations, we consider that a targeted consultation with key interests will suffice in this instance. We do not propose to carry out a public consultation.

11. We have begun engaging with the sector to discuss how the transitional provisions might work in practice, and to seek their feedback before finalising the instrument.

Legal issues and proposed timing

12. The instrument is subject to affirmative procedure. The aim is to finalise the instrument by the end of August 2020. The due Parliamentary process would then take approximately 7 weeks, and we would anticipate the instrument coming into force in early November 2020. We will bring forward further advice, a draft instrument, and the necessary impact assessments for your approval towards the end of August.

Recommendation

13. I **recommend** that the Cabinet Secretary:
- **notes** progress on this matter; and
 - **agrees** that we do not need to carry out a public consultation in view of the circumstances outlined at paragraph 10.

[Redacted]
Environmental Quality & Circular Economy Division

Read a summary via [FOI reply from the Scottish Government on toxic chemical discharges via wellboats 31 Aug 2020](#)

A quick look at [Marine Scotland's web-site in relation to wellboat discharges](#) suggests that applications for licences have flooded in from salmon farmers since November 2019 before licensing powers are transferred to SEPA in November 2020:

Menu Selection

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Marine Licence documentation

Maps Info Data

Filter on Title

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Apply

Title	Updated date
Marine Licence - Wellboat Discharge - Westbister, Scapa Flow - 00008773	28/08/2020
Marine Licence - Wellboat Discharge - Greanamul, Isle of Benbecula - 07299	17/08/2020
Marine Licence Application - Wellboat Discharge - Torr Mor, Clashnessie Bay - 07345	06/08/2020
Marine Licence Application - Wellboat Discharge - Tarbert South, Loch Fyne - 07361	04/08/2020
Marine Licence - Wellboat Discharge - Strone, Loch Carron - 07349	03/08/2020
Marine Licence - Wellboat Discharge - Taranaish, Loch Roag - 07342	03/08/2020
Marine Licence - The Scottish Salmon Company - Wellboat Discharge - Gravir West, Loch Odhairn, Isle of Lewis - 07331	03/08/2020
Marine Licence - Wellboat Discharge - Strone, Loch Striven - 07300	03/08/2020
Marine Licence Application - Wellboat Discharge - Setterness South, Shetland - 07382	30/07/2020
Marine Licence - Wellboat Discharge - Vidlin Outer, Vidlin Voe - 07304	17/07/2020
Marine Licence - Wellboat Discharge - Vidlin North, Vidlin Voe - 07303	17/07/2020
Marine Licence - Wellboat Discharge - Mangaster Outer, Mangaster Voe - 07302	17/07/2020
Marine Licence - Wellboat Discharge - Bellister, Dury Voe - 07301	17/07/2020
Marine Licence Application - Wellboat Discharge - Strondoir Bay, Loch Fyne - 07359	16/07/2020
Marine Licence - Wellboat Discharge - Meall Mhor, Loch Fyne - 07332	09/07/2020
Marine Licence - Wellboat Discharge - Eughlam North, East Loch Roag - 07298	09/07/2020
Marine Licence - Wellboat Discharge - Loch Tuath, Isle of Mull - 07310	09/07/2020
Marine Licence - Wellboat Discharge - Trilleachan Mor, Isle of Harris - 07308	09/07/2020
Marine Licence - Wellboat Discharge - Eughlam South, East Loch Roag - 07307	09/07/2020
Marine Licence - Wellboat Discharge - Gob a Bharra, Loch Fyne - 07312	09/07/2020
Marine Licence - Wellboat Discharge - Vacasay, East Loch Roag - 07311	09/07/2020
Marine Licence - Wellboat Discharge - Vuia Mor, Loch Roag, Isle of Lewis - 07320	09/07/2020
Marine Licence - Wellboat Discharge - Gravir, Outer Ordhairn, Isle of Lewis - 07319	09/07/2020
Marine Licence - Wellboat Discharge - Ardyne, Loch Striven, Argyll and Bute - 07318	09/07/2020
Marine Licence - Wellboat Discharge - Aird, Loch Torridon - 07333	09/07/2020
Marine Licence - Wellboat Discharge - Glenan Bay, Loch Fyne - 07335	09/07/2020
Marine Licence Application - Wellboat Discharge - Strone, Loch Carron - 07349	06/07/2020
Marine Licence Application - Wellboat Discharge - Rubha Stillaig, Loch Fyne - 07350	06/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Cooke Aquaculture Scotland Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Dawnfresh Farming Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Grieg Seafood Shetland Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Kames Fish Farming Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - MOWI Scotland Ltd	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - Scottish Sea Farms	03/07/2020
Temporary Marine Licence Variations (03 July 2020) - Wellboat Discharge - Various Sites - The Scottish Salmon Company	03/07/2020
Marine Licence Application - Wellboat Discharge - Holms Geo, Shetland - 07328	30/06/2020
Marine Licence Application - Wellboat Discharge - Aird, Loch Torridon - 07333	29/06/2020
Marine Licence Application - Wellboat Discharge - Teisti Geo, Shetland - 07327	25/06/2020
Marine Licence Application - Wellboat Discharge - Lippie Geo, Shetland - 07326	25/06/2020
Marine Licence Application - Wellboat Discharge - Taranaish, Loch Roag - 07342	22/06/2020
Marine Licence Application - Wellboat Discharge - Portree, Isle of Skye - 07341	22/06/2020
Marine Licence Application - The Scottish Salmon Company - Wellboat Discharge - Gravir West, Loch Odhairn, Isle of Lewis - 07331	17/06/2020

Marine Licence Variation - Wellboat Discharge - Bagh Dail Nan Ceann, Loch Shuna - 06897	17/06/2020
Marine Licence Application – Wellboat Discharge – Kenmore, Loch Torridon – 07334	17/06/2020
Marine Licence Application – Wellboat Discharge – Glenan Bay, Loch Fyne - 07335	17/06/2020
Marine Licence Application – Wellboat Discharge – Meall Mhor, Loch Fyne - 07332	17/06/2020
Marine Licence Application - Wellboat Discharge - Strone, Loch Striven - 07330	16/06/2020
Marine Licence Application – Wellboat Discharge – Vuia Mor, Loch Roag, Isle of Lewis - 07320	08/06/2020
Marine Licence Application – Wellboat Discharge -Gravir, Outer Ordhairn, Isle of Lewis - 07319	08/06/2020
Marine Licence Application – Wellboat Discharge – Ardyne, Loch Striven, Argyll and Bute - 07318	08/06/2020
Marine Licence Application – Wellboat Discharge – Gob a Bharra, Loch Fyne - 07312	08/06/2020
Marine Licence Application – Wellboat Discharge – Trilleachan Mor, Isle of Harris - 07308	05/06/2020
Marine Licence - Wellboat Discharge - Plocrapol, Isle of Harris - 07260	05/06/2020
Marine Licence - Wellboat Discharge - Uiskevagh, Benbecula - 07246	05/06/2020
Marine Licence - Wellboat Discharge - Petersport North, Benbecula - 07245	05/06/2020
Marine Licence - Wellboat Discharge - Petersport South, Benbecula - 07244	05/06/2020
Marine Licence - Wellboat Discharge - Eport, North Uist - 07243	05/06/2020
Marine Licence Application – Wellboat Discharge – Vacasay, East Loch Raog - 07311	05/06/2020
Marine Licence Application – Wellboat Discharge – Loch Tuath, Isle of Mull – 07310	05/06/2020
Marine Licence Application - Wellboat Discharge - Greanamul, Isle of Benbecula - 07299	03/06/2020
Marine Licence Application - Wellboat Discharge - Vidlin Outer, Vidlin Voe - 07304	03/06/2020
Marine Licence Application - Wellboat Discharge - Vidlin North, Vidlin Voe - 07303	03/06/2020
Marine Licence Application - Wellboat Discharge - Mangaster Outer, Mangaster Voe - 07302	03/06/2020
Marine Licence Application - Wellboat Discharge - Bellister, Dury Voe - 07301	03/06/2020
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Marine Licence Application - Wellboat Discharge - Eughlam North, East Loch Roag - 07298	03/06/2020
Marine Licence Variation Application - Wellboat Discharge - East Tarbert Bay, Argyll - 06512	07/05/2020
Marine Licence Variation Application - Wellboat Discharge - Geasgill Fish Farm, Isle of Mull - 06367	07/05/2020
Marine Licence Application - Wellboat Discharge - Coledeep, Shetland - 07273	06/05/2020
Marine Licence Application - Wellboat Discharge - Gob Na Hoe, Isle of Skye - 07274	06/05/2020
Marine Licence Application - Wellboat Discharge - Maragay Mor, Benbecula - 07284	06/05/2020
Marine Licence Variation - Wellboat Discharge - Swining 3, Setterness - 07154	01/05/2020
Marine Licence Application – Wellboat Discharge – West Strome, Loch Carron - 07265	21/04/2020
Temporary Marine Licence Variation (08 April 2020) - Wellboat Discharge - Loch Duart Limited	20/04/2020
Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - Cooke Aquaculture Scotland Ltd	20/04/2020

Temporary Marine Licence Variation (08 April 2020) - Wellboat Discharge - Kames Fish Farming Ltd	20/04/2020
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Temporary Marine Licence Variations (08 April 2020) - Wellboat Discharge - Various Sites - Grieg Seafood Shetland Ltd	20/04/2020
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Temporary Marine Licence Variations (16 April 2020) - Wellboat Discharge - Various Sites - MOWI Scotland Ltd	20/04/2020
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Marine Licence Application - Wellboat Discharge - Petersport North, Benbecula - 07245	15/04/2020
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Marine Licence Application - Wellboat Discharge - Plocrapol, Isle of Harris - 07260	15/04/2020
Marine Licence - Wellboat Discharge - Invasion Bay, Loch Sunart - 07064	08/04/2020
Licence - Wellboat Discharge - Poll na Gille, Shuna - 07211	08/04/2020
Marine Licence Variation Application - Wellboat Discharge - Bagh Dail Nan Ceann, Loch Shuna - 06897	06/04/2020
Marine Licence - Wellboat Discharge - Maclean's Nose, Loch Sunart - 06855	03/04/2020
Marine Licence Variation Application - Wellboat Discharge - Bagh Dail Nan Ceann Fish Farm, Loch Shuna - 06879	03/04/2020
Marine Licence - Wellboat Discharge - Sgian Dubh, Loch Striven - 07226	03/04/2020
Marine Licence - Wellboat Discharge - Reibinish, Isle of Harris - 07223	03/04/2020
Marine Licence - Wellboat Discharge - Sgeir Dughall, Loch Torridon - 07224	03/04/2020
Marine Licence Variation - Wellboat Discharge - Foraness South, Setterness - 07136	03/04/2020
Marine Licence Variation - Wellboat Discharge - Setterness North, Setterness - 07124	03/04/2020
Marine Licence - Wellboat Discharge - Hogan, Hoganess, Shetland - 07266	02/04/2020
Marine Licence - Wellboat Discharge - Holm of Gruting, Hoganess, Shetland - 07267	02/04/2020
Marine Licence Application - Wellboat Discharge - Poll na Gille, Shuna - 07211	25/03/2020
Marine Licence Application - Wellboat Discharge - Hunda, Orkney - 07229	23/03/2020
Marine Licence Application - Wellboat Discharge - Camus Glas, Loch Sunart - 07210	17/03/2020
Marine Licence Application - Wellboat Discharge - Gometra, Isle of Mull - 07222	05/03/2020
Marine Licence Application - Wellboat Discharge - Sgian Dubh, Loch Striven - 07226	04/03/2020
Marine Licence Application - Wellboat Discharge - Sgeir Dughall, Loch Torridon - 07224	04/03/2020
Marine Licence Application - Wellboat Discharge - Reibinish, Isle of Harris - 07223	04/03/2020
Marine Licence Application - Wellboat Discharge - Westerbister, Scapa Flow - 07212	03/03/2020
Marine Licence - Wellboat Discharge - Setterness North, Setterness - 07124	31/01/2020
Marine Licence - Wellboat Discharge - Foraness South, Setterness - 07136	31/01/2020
Marine Licence - Wellboat Discharge - Swining 3, Setterness - 07154	31/01/2020
Marine Licence - Wellboat Discharge - Scalpay Multi-Trophic Aquaculture Ltd - 06853	31/01/2020
Marine Licence Variation Application - Wellboat Discharge - Colonsay, Isle of Colonsay - 07002	31/01/2020
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Marine Licence - Wellboat Discharge - Loch Alsh, Highlands - 06949	31/01/2020
Marine Licence - Wellboat Discharge - Sicoka, Ronas Voe - 07192	30/01/2020
Marine Licence - Wellboat Discharge - West of Burwick, Shetland - 07126	29/01/2020
Marine Licence - Wellboat Discharge - North Voe, Shetland - 07171	29/01/2020
Marine Licence Variation - Wellboat Discharge - Spelve B, Loch Spelve - 06726	29/01/2020
Marine Licence - Wellboat Discharge - Scoreholms, Shetland - 07125	29/01/2020
Marine Licence - Wellboat Discharge - North Papa, Shetland - 07132	29/01/2020
Marine Licence - Wellboat Discharge - Langa, Shetland - 07130	29/01/2020
Marine Licence - Wellboat Discharge - Portnalong, Loch Harport - 07140	29/01/2020
Marine Licence - Wellboat Discharge - North Havra, Shetland - 07129	29/01/2020

Marine Licence Application - Wellboat Discharge - Slcoka, Ronas Voe - 07192	08/01/2020
Marine Licence - MOWI Scotland Ltd - Wellboat Discharge - 07005	23/12/2019
Marine Licence- Wellboat Discharge- Djubawick, Shetland- 06930	23/12/2019
Marine Licence- Wellboat Discharge- Belmont, Shetland- 06932	23/12/2019
Marine Licence- Wellboat Discharge- Burkwell, Shetland- 06937	23/12/2019
Marine Licence- Wellboat Discharge- Bastaness, Shetland- 06940	23/12/2019
Marine Licence - Wellboat Discharge - Loch Duich - 06311	23/12/2019
Marine Licence- Wellboat Discharge- Uyea Isle, Shetland- 06929	23/12/2019
Marine Licence- Wellboat Discharge- Kirkabister, Shetland- 06938	23/12/2019
Marine Licence- Wellboat Discharge- Vatsetter, Shetland- 06935	23/12/2019
Marine Licence- Wellboat Discharge -Hascosay, Shetland- 06939	23/12/2019
Marine Licence- Wellboat Discharge- Winna Ness, Shetland- 06945	23/12/2019
Marine Licence- Wellboat Discharge- Chalmers Hope, Orkney-06950	23/12/2019
Marine Licence- Wellboat Discharge- West Fara, Orkney- 06958	23/12/2019
Marine Licence- Wellboat Discharge- Quaterness, Orkney- 06960	23/12/2019
Marine Licence- Wellboat Discharge- North Sandwick, Shetland- 06934	23/12/2019
Marine Licence Variation - Wellboat Discharge - An Camus, Loch Boisdale - 06391	23/12/2019
Marine Licence - Wellboat Discharge - Noust Geo, Orkney - 07137	23/12/2019
Marine Licence - Wellboat Discharge - Lober, Scapa Flow, Orkney - 07034	05/12/2019
Marine Licence Variation Application - Wellboat Discharge - Spelve B, Loch Spelve - 06726	05/12/2019
Marine Licence Application - Wellboat Discharge - North Voe, Shetland - 07171	04/12/2019
Marine Licence Application - Wellboat Discharge - Swining 3, Setterness - 07154	04/12/2019
Marine Licence Application - Wellboat Discharge - North Havra, Shetland - 07129	04/12/2019
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Marine Licence Application - Wellboat Discharge - West of Burwick, Shetland - 07126	04/12/2019
Marine Licence Application - Wellboat Discharge - Scoreholms, Shetland - 07125	04/12/2019
Marine Licence Application - Wellboat Discharge - Setternes North, Shetland - 07124	04/12/2019
Marine Licence Application – Wellboat Discharge – Portnalong, Loch Harport – 07140	02/12/2019
Marine Licence Variation Application - Wellboat Discharge - Maclean's Nose, Loch Sunart - 06855	21/11/2019
Marine Licence - Wellboat Discharge - Carness Bay, Shapinsay - 06916	21/11/2019
Marine Licence - Wellboat Discharge - South Cava, Scapa Flow - 06913	21/11/2019
Marine Licence - Wellboat Discharge - Lyrava Bay, Orkney - 06942	21/11/2019
Marine Licence - Wellboat Discharge - Pegal Bay, Scapa Flow - 06933	19/11/2019
Marine Licence Application - Wellboat Discharge - Eday, Orkney - 07137	15/11/2019
Marine Licence Application - Wellboat Discharge - Wick of Gruting, Shetland - 07104	11/11/2019
Marine Licence- Wellboat Discharge- Grey Horse Channel Outer, Cheesebay- 07066	06/11/2019
Marine Licence- Wellboat Discharge- Grey Horse Channel, Cheesebay, North Uist- 07084	06/11/2019
Marine Licence- Wellboat Discharge- Groatay, Cheesebay, North Uist- 07085	06/11/2019
Wellboat Discharge - 06753 - Marine Licence	31/10/2018
Wellboat Discharge - 05824 - Marine Licence Variation	18/10/2018
Wellboat Discharge - 05824/16/0 - Marine Licence	18/10/2018
Wellboat Discharge - 05824 - Chart	18/10/2018
Wellboat Discharge - 05824 - GIS Chart	18/10/2018
Wellboat Discharge - 06614 - Map	20/09/2018
Wellboat Discharge - 06614 - Marine Licence Application	20/09/2018
Wellboat Discharge - 06614 - GIS Map	20/09/2018
Wellboat Discharge - 06753 - Marine Licence Application	18/09/2018
Wellboat Discharge - 06753 - GIS Map	18/09/2018
Wellboat Discharge - 06753 - Maps	18/09/2018
Wellboat Discharge - 06741 - Marine Licence Application	13/09/2018
Wellboat Discharge - 06741 - Map	13/09/2018
Wellboat Discharge - 06741 - GIS Map	13/09/2018

Here's a recent example:

Marine Licence Application for Discharge of Treatment Agents from a Wellboat

Version 1.0

Marine (Scotland) Act 2010

Wellboat Discharge Details

(a) Brief description of the discharge including rationale for discharge:

In order to achieve more effective treatments to control sea lice (*Lepeophtheirus salmonis*) infection, with less potential for environmental impact due to the greater control and lower concentration of medicine required, The Scottish Salmon Company (SSC) have made an application for the use of licensed sea lice medicine bath treatments using well boats. It is necessary to have a range of medicines available to maintain an effective sea lice treatment strategy. Sea lice chemotherapeutics currently consented for use within Scotland are the in-feed treatment (Slice) and bath treatments (Exis, SalmosanVet, Azasure, Alphamax and Hydrogen Peroxide).

In order to ensure a robust health management strategy and an effective sea lice treatment strategy, it is essential that all available products and all possible treatment methods are made available for use by the industry. For this reason, SSC are applying for the use of the following bath treatment medicines to be administered in well boats:

- Excis™ (Cypermethrin);
- Salmosan or SalmosanVet® (Azamethiphos);
- Azasure (Azamethiphos);
- Alphamax™ (Deltamethrin); and
- Hydrogen Peroxide.

SSC strategy involves the use of in-feed medicines for a longer period during the production cycle, initiating treatments at lower trigger levels, strategic use of treatments to ensure optimum targeting of lice life stages, and focused use of bath treatments later on in the cycle. SSC disease management program has proven highly successful and the additional option of using well-boat treatments will ensure the efficient control of sea lice and high level of fish welfare continues.

(b) Proposed start date (Target duration for determination of a marine licence application is 14 weeks):

01/08/2020

(c) Proposed completion date:

ongoing

(d) Location:

West Strome Marine Fish Farm, Loch Carron,

Details of Treatment Agent(s) to be Discharged (Please provide Material Safety Data Sheets for each chemical to be discharged).

Proprietary Name of Treatment Agent(s)	Chemical Name of Treatment Agent(s)
1. Excis™	Cypermethri
2. Salmosan/SalmosanVet® or Azasure	Azamethiphos
3. Alphamax™	Deltamethrin
4. Hydrogen Peroxide	Hydrogen Peroxide.

Details of Discharge (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Date of Discharge (approx.)	Duration of Discharge (minutes)	Weight/Volume of Agent (grams/cubic metres)	Total Volume (including solvent) (cubic metres)
1	Various times throughout production cycle	approx 15 - 20 min	0.5ml/m3	Dependent on vessel used
2	Various times throughout production cycle	approx 15 - 20 min	0.2g/m3	Dependent on vessel used
3	Various times throughout production cycle	approx 15 - 20 min	0.2g/m3	Dependent on vessel used
4	Various times throughout production cycle	approx 15 - 20 min	dosed at 1600ppm	Dependent on vessel used

"The use of a lethal cocktail of toxic chemicals by salmon farms continues to slip through the net," said Don Staniford, [Director of Scottish Salmon Watch](#). "It seems that the floodgates have been opened to wellboat licences before the transfer of regulatory powers to SEPA. It is a scandal that the vast quantities of the carcinogen Formaldehyde and tanks full of toxic Hydrogen Peroxide used on salmon farms across Scotland are not published via a public register or online via 'Scotland's Aquaculture'. The use of Azamethiphos and Deltamethrin via well boats in 2019 and 2020 is not yet publicly available although data for 2019 will finally be published by SEPA at the end of September. And the jury is still out on whether the neonicotinoid insecticide Imidacloprid has already been used in salmon farming. The salmon farming industry must come clean on their shocking use of toxic chemicals. All is not well with chemically embalmed Scottish salmon."



Last week (25 August 2020), Scottish Salmon Watch [provided the Scottish Information Commissioner will further reasoning](#) why SEPA must disclose documents on Benchmark's 'CleanTreat' system (the vehicle used for [Imidacloprid/BMK08/Ectosan](#)) [3].



Contact:

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

Background:

In July 2020, Scottish Salmon Watch [questioned why data on the use of Azamethiphos and Deltamethrin via well boats was still not published for 2019](#) when data on the use of toxic chemicals via salmon farms was available up to March 2020 via 'Scotland's Aquaculture'.

Don Staniford
@TheGAAIA

Why is Scottish Pollutant Release Inventory data on use of Azamethiphos & Deltamethrin via well boats still not published for 2019 when data on use of toxic chemicals via salmon farms is now available up to March 2020 via Scotland's Aquaculture? @ScottishEPA @marinescotland

Scottish pollutant release inventory

Year	Company Name	Site Address	Total Release	Particulars
2019	Scottish Salmon Farm Ltd 16 MCR, Lamlash Bay	Lamlash Bay, St Molar's, Lamlash, Isle of Arran KA27 5EG	50.0	50.0
2019	Scottish Ltd MCR, Loch Alish	Loch Alish, Stron an Tairbh, East of Kyleakin, Kyle, Isle of Skye T141 8PK	50.0	50.0
2019	Scottish Salmon Farm Ltd 7 South MCR, Loch	Ross Burn, Loch Ross, North of Corrag & Chabail, Turker, Argyll PA29 6XT	50.0	50.0
2019	Web Farming Ltd One MCR East 5, Zverevan	Loch Elva, Zverevan, Tayside PA22 1HU	50.0	50.0
2019	Scottish Ltd 15 Mile MCR, Skene	Pull na Olla, Loch Mallin, Collie Moss, Skene, by Olan, Argyll PA24 4SD	50.0	50.0
2019	Scottish Salmon Farm Ltd 7 MCR, Loch na Keal	Pars & Blane, Loch na Keal, North of Geasgill Islands, Olla Island, by Isle of Mull, Argyll PA23 6LZ	50.0	50.0

Read more via: [Public Register of Toxic Chemicals Used in Scottish Salmon Farming?](#)

In December 2019, [Scottish Salmon Watch revealed following a FOI disclosure by the Scottish Government](#) that Marine Scotland was keen to "downplay" any reference to wellboat discharge licensing moving to SEPA as it "may well be seized upon" ([in relation to Benchmark's 'CleanTreat' system](#) which was subsequently revealed in March 2020 to be the [toxic neonicotinoid insecticide Imidacloprid](#)).

The move of licensing wellboat discharges from Marine Scotland to SEPA "may well be seized on" concedes a [redacted email dated December 2018](#):

From: [Redacted]
Sent: 07 December 2018 11:28
To: [Redacted]
Cc: [Redacted]

Subject: RE: For information only - Outcome of meetings on 28 November - mortality disposal + Benchmark cleantreat

Attachments: Cab Sec brief - benchmark - Dec. 2018.docx

█ – thanks. Happy in large part, but I've suggested downplaying the references to wellboat discharge licensing moving to SEPA as it shouldn't affect consideration of this proposal under the current system (and any suggestion that it might may well be seized on).

Regards, █

Read more via "[Cleaning Tox-Sick Scottish Salmon](#)"

In October 2018, Scottish Salmon Watch [reported](#):

Media Backgrounder (October 2018):

All is Not Well With Sick Scottish Salmon

- Unreported Use of Toxic Chemicals Via Wellboats Slips Net
- Lethal Plumes of Poison Flooding Scottish Lochs
- New Scientific Paper Raises Serious Concerns
- Norway proposes a ban on toxic chemical use on salmon farms
- SEPA now reviewing toxicity of Azamethiphos & Hydrogen Peroxide (???)



Summary:

The use of toxic chemicals via wellboats to treat lice-infested Scottish salmon is slipping through the net. According to SEPA, [Scotland's Aquaculture database](#) does NOT record the use of Azamethiphos and Deltamethrin via wellboats and does NOT record use of Hydrogen Peroxide at all.

Data on the use of Azamethiphos and Deltamethrin is recorded via [SEPA's Scottish Pollutant Release Inventory](#) but is not available for 2017 and 2018 (Hydrogen Peroxide use is not recorded at all).

FOI documents obtained from the Scottish Government and SEPA reveal that reporting on the use of toxic chemicals via wellboats is haphazard, at extremely short notice and in some cases (e.g. Scottish Sea Farms in Loch Nevis in December 2016) reporting takes place after the use of toxic chemicals (i.e. breach of the licence).

Data suggests an explosion in the use of Azamethiphos, Deltamethrin and Hydrogen Peroxide via wellboats (although the data sets available make it impossible to calculate annual use figures).

Data [disclosed by the Scottish Government in June 2018](#) reveals that dozens of wellboats - mostly registered in Norway but some in Chile and Canada - are now licensed by Marine Scotland until as far away as 2021 to discharge toxic chemicals from over 100 salmon farms around Scotland.

In January 2017, The Sunday Times [revealed a 1000% increase](#) in the use of toxic chemicals on Scottish salmon farms over the last decade (but this [data set](#) did not include use via wellboats or the [sky-rocketing use of hydrogen peroxide](#)).

In June 2018, Marine Scotland's Daniel Pendrey wrongly told Scottish Salmon Watch that wellboat usage of toxic chemicals had been included in the Scotland's Aquaculture database since 2014 (SEPA told Scottish Salmon Watch in May 2018 that wellboat usage of toxic chemicals was NOT included).

Read more via "[All is Not Well With Sick Scottish Salmon - unreported use of toxic chemicals via wellboats slips net](#)" and "[FOI re. Well Boats & Salmon Farms Since 1 October 2018 - July 2020](#)".

In May 2020, Scottish Salmon Watch [filed a FOI request with the VMD, the Scottish Environment Protection Agency and the Scottish Government](#) - including:



Scottish Ministers: scottish.ministers@gov.scot

Scottish Environment Protection Agency: terry.ahern@sepa.org.uk

Veterinary Medicines Directorate: postmaster@vmd.defra.gsi.gov.uk

20 May 2020

**FOI Request: Field Trials of Imidacloprid (Ectosan/BMK08)
& Possible Misreporting of Chemical Use in Salmon Farming Since 2017**

Further to Scottish Salmon Watch's [letter dated 17 March 2020](#), please provide details on any proposed, in progress and completed field trials of Imidacloprid (Ectosan/BMK08) by the salmon farming industry in Scotland since 2017.

SEPA claimed in an email dated 6 November 2019 ([disclosed via F0191629 on 12 May 2020](#)) that:

SEPA is already involved in discussions at a national/UK level with the Veterinary Medicine Directorate (VMD) about formalin and other chemicals used in freshwater and marine aquaculture.

Please provide information on those discussions with the VMD and other government agencies since 2017.

Finally, please note that Scottish Salmon Watch's [letter to SEPA, Scottish Ministers and the VMD dated 26 June 2019](#) included the recommendation that a public register be established; namely:



Scottish Ministers: scottish.ministers@gov.scot
Scottish Environment Protection Agency: terry.ahern@sepa.org.uk
Veterinary Medicines Directorate: postmaster@vmd.defra.gsi.gov.uk

26 June 2019

**Public Register of ALL toxic chemical use on Scottish salmon farms
& Immediate Ban on Carcinogenic Formaldehyde (Formalin)**

Scottish Salmon Watch asks for inter-governmental co-operation to establish a public register of ALL toxic chemicals used on Scottish salmon farms.

As far as we understand it, only data detailing use of the sea lice chemicals Azamethiphos, Cypermethrin, Deltamethrin, Emamectin Benzoate and Teflubenzuron is [published via the Scotland's Aquaculture web-site](#) (and even here the use of Azamethiphos and Deltamethrin via well boats is [understand to be unreported](#) although we believe this anomaly may soon be rectified).

Data on the use of [Hydrogen Peroxide](#) (which has [sky-rocketed over the last decade](#) - along with the [use of sea lice chemicals](#)), [Antibiotics](#) and other toxic chemicals such as the carcinogenic [Formaldehyde \(Formalin\)](#) is not routinely published except [via Freedom of Information](#).

The [confusion](#) regarding the use of [Formaldehyde \(Formalin\)](#) as [either a biocide or prescribed by a veterinarian via the 'Cascade'](#) illustrates the need for clarity in reporting and the urgent need for a public register.

The use of [Formaldehyde \(Formalin\)](#) by salmon farms in Scotland is an interesting case study which warrants further investigation.

Could you please now add Imidacloprid to that list?

On 1 September 2020, the Scottish Government finally [published a FOI reply on field trials of Imidacloprid \(Ectosan/BMK08\) \[4\]](#) - including:

Published: 1 Sep 2020

Field trials of Imidacloprid (Ectosan/BMK08) by the salm...

1) details on any proposed, in progress and completed field trials of Imidacloprid (Ectosan/BMK08) by the salmon farming industry in Scotland since 2017. The Scottish Government does not hold marine licences or similar documentation for the legal discharge of Imidacloprid/Ectosan/BMK08 as none have been issued by Marine Scotland, nor have any applications been made to Marine Scotland. The Scottish Government has not licensed any field trial(s), nor have we reports of any activity for which a licence would have been needed. Marine Scotland is not aware of any unlicensed activity in this regard.



Read more via [Secret Salmon - On the Trail of Imidacloprid Use in Scotland!](#)

Scottish Salmon Watch this week (2 September 2020) [filed a formal review request with the Director of Marine Scotland](#) with regards to the Scottish Government's refusal to provide information (including data) on the use of toxic chemicals via wellboats [5].

More background on toxic chemicals used in Scottish salmon farming via:

[British Wildlife: "Neonics in Salmon Farming - Alarm Bells Are Ringing"](#)

[Oban Times: "Call to ban fish farm use of formaldehyde"](#)

[Salmon farm rapped for toxic pesticide breaches](#)

[Petition: "Stop Toxic Salmon Farm Chemicals Polluting Scottish Lochs"](#)

[Toxic Scottish salmon](#)

[Sunday Times: "Outlawed insecticide may be used on Scottish salmon"](#)

[Anyone for ASC-Certified Scottish Salmon Doused in Carcinogenic Formaldehyde?](#)

[Secret Trials: 'Royal' Salmon Doused with Bee-Killing Insecticide Imidacloprid?](#)

[FOI letter to Scottish Ministers re. Formaldehyde/Formalin use on salmon farms since 2013](#)

[The Ferret: "Toxic fish farm pesticide polluted ten lochs across Scotland"](#)

[REVEALED: Carcinogenic Chemical Formaldehyde Flooding Scottish Lochs](#)

[More toxic pesticides to be used by salmon farmers](#)

[Under the Cloak of Coronavirus: SEPA open the floodgates to lobster-killing chemicals!](#)

[The Ferret: "Fish farm companies 'bidding to use bee-harming pesticide'"](#)

[Revealed: Toxic Neonicotinoid Insecticide Used to 'CleanTreat' Lousy Salmon](#)

[Media Backgrounder: Chemically Embalmed Scottish Farmed Salmon](#)

[Video Nasty: Chemically Embalmed Scottish Salmon at Kames in Loch Traraig](#)

[Sunday Times: "Chemical fears at Scots fish farms"](#)

[Scottish fish farms using cancer-linked embalming fluid as disinfectant](#)

[EXPOSED: Mowi's Cache of Carcinogenic Chemicals On Conservative MSPs Estate](#)

[EXPOSED: Scottish Salmon's Cascading Use of Cancer-Causing Chemical](#)

[Salmon farming giant Mowi probed over chemical use](#)

[Fish farming industry bids to relax limits on toxic pesticide](#)

[Effects of pharmaceuticals used to treat salmon lice on non-target species: Evidence from a systematic review](#)

[All is Not Well With Sick Scottish Salmon - unreported use of toxic chemicals via wellboats slips net](#)

[SliceGate: Anatomy & Chronology of an Environmental Lobotomy - How the Scottish Environmental Protection Agency was Sliced to death by the Scottish Government and salmon farming lobby](#)

[How the Scottish Government 'nuanced' away fish farm pesticide ban](#)

[Pesticide report suppressed after freedom of information warning](#)

[Scottish Government under fire for helping block pesticide ban](#)

[Revealed: secret role of US drug company in fish farm pesticide row](#)

[Ban on polluting pesticide dropped after complaint from fish farmers](#)

[Mapped: the 45 lochs polluted by fish farm pesticides](#)

[Salmon farming in crisis: 'We are seeing a chemical arms race in the seas'](#)

[The Sunday Times: "Salmon industry toxins soar by 1000 per cent"](#)

[Scottish Salmon's Lethal Legacy - Ten-fold Increase in Toxic Chemical Use in Ten Years](#)

[Scientific Backgrounder: Ecotoxicity & Chemical Resistance](#)

[Media Backgrounder: Scotland's 'Silent Spring' of the Sea](#)

[Daily Mail: "The toxic chemicals in farmed salmon straight from the loch"](#)

[Scottish Salmon Overdoses on Toxic Chemical](#)

[Scottish fish farmers use record amounts of parasite pesticides](#)

[Chemicals to control salmon parasites](#)

[Silent Spring of the Sea](#)



Don Staniford
@TheGAAIA



Track & trace which salmon farms are applying to discharge toxic chemicals such as Azamethiphos, Cypermethrin, Deltamethrin & Hydrogen Peroxide via tinyurl.com/ydgyxnpz
@marinescotland @MowiScotlandLtd @GriegShetland @scotseafarms @salmon_scottish @SSPOsays @FergusEwingMSP

marine scotland INFORMATION

Home Home > Documentation > Marine Licence documentation

Title

- Marine Farm Application - Wellboat Discharge - Helms Geo. Shetland - 07229
- Marine Licence Application - Wellboat Discharge - Tash Geo. Shetland - 07227
- Marine Licence Application - Wellboat Discharge - Linn Geo. Shetland - 07226
- Marine Licence - Fish Farm - Cultraquo. Isle of Skye - 07224
- Marine Licence Variation - Marine Farm - Ardrosk Loch Ailort - 07243
- Marine Licence - Marine Farm - Bellister. Shetland - 07220
- Marine Licence Application - Marine Farm - Kenmore Loch Torridon - 07240
- Marine Licence Application - Wellboat Discharge - Taranach Loch Rannoch - 07242
- Marine Licence Application - Wellboat Discharge - Portree Isle of Skye - 07241
- Marine Licence Application - Marine Farm - Bight of Bellister. Shetland - 07246
- Marine Licence Application - Marine Farm - Laura Vike. Shetland - 07247
- Marine Licence Application - The Scottish Salmon Company - Wellboat Discharge - Grant West Loch Cuh. Isle of Lewis - 07240
- Marine Licence Variation - Wellboat Discharge - Baryh Gail Ben Ceann Loch Shuna - 06997
- Marine Licence Variation - Marine Farm - Ardrosk Loch Ailort - 07243
- Marine Licence Application - Wellboat Discharge - Kenmore Loch Torridon - 07240
- Marine Licence Application - Wellboat Discharge - Aird. Loch Torridon - 07239
- Marine Licence - Marine Farm - South Loch. Skye - 07234
- Marine Licence Variation - Marine Farm - Am Camas Loch Boidale - 06937
- Marine Licence Variation - Marine Farm - Donoch Firth - 06962
- Marine Licence Variation - Marine Farm - Donoch Firth - 06963
- Marine Licence Application - Wellboat Discharge - Glean Bay Loch Fine - 07235

MARINE POLLUTANT

SALMON FARM

10:22 AM · Jun 26, 2020



Don Staniford
@TheGAAIA



Toxic Scottish Salmon - here's an application @salmon_scottish for use of the shellfish-killing chemicals Azamethiphos, Cypermethrin, Deltamethrin & Hydrogen Peroxide in Loch Carron tinyurl.com/y7v7jqqc
@marinescotland There's a fleet of wellboats to discharge toxic chemicals

Trading Title (if appropriate): **The Scottish Salmon Company**

Address: **8 Melville Crescent, Edinburgh EH3 7JA**

Name of contact (if different): **Penny Hawdon**

Telephone No. (inc. dialing code): **0131 718 8500**

Email: **penny.hawdon@scottishsalmon.com**

(b) Proposed start date (Target duration for determination of a marine licence application is 14 weeks):
01/08/2020

Disposit	Date of Discharge (approx.)	Duration of Discharge (minutes)	Weight/Volume of Agent (grams/lubic or litres)	Total Volume (including solvent) (cubic metres)
1	approx 15 - 20 min	approx 15 - 20 min	0.5mlm3	Dependent on vessel used
2	approx 15 - 20 min	approx 15 - 20 min	0.2gm3	Dependent on vessel used
3	approx 15 - 20 min	approx 15 - 20 min	0.2gm3	Dependent on vessel used
4	approx 15 - 20 min	approx 15 - 20 min	dosed at 1600ppm	Dependent on vessel used

Marine Licence Application for Discharge of Treatment Agents from a Wellboat

Details of Treatment Agent(s) to be Discharged (Please provide Material Safety Data Sheets for each chemical to be discharged)

Proprietary Name of Treatment Agent(s)	Chemical Name of Treatment Agent(s)
1. Equis™	Cypermethrin
2. SalmoScurf™/Scurf™/Scurf™ or Aquasol	Azamethiphos
3. Aphamax™	Deltamethrin
4. Hydrogen Peroxide	Hydrogen Peroxide

Wellboat Discharge Details

(a) Brief description of the discharge including rationale for discharge:

(b) Details of discharge agents:

Wellboat Name	Discharge Agent	Discharge Point	Discharge Rate	Discharge Time	Total Discharge Rate of 2000liters/boat/each day (litres)
MS Breeze	Hydrogen Peroxide	MS Breeze	1000litres	15 min	15000litres
MS Breeze	Hydrogen Peroxide	MS Breeze	1000litres	15 min	15000litres
MS Breeze	Hydrogen Peroxide	MS Breeze	1000litres	15 min	15000litres
MS Breeze	Hydrogen Peroxide	MS Breeze	1000litres	15 min	15000litres
MS Breeze	Hydrogen Peroxide	MS Breeze	1000litres	15 min	15000litres

10:00 AM · Jun 26, 2020

 **Don Staniford**
@TheGAAIA



Under the Cloak of #Coronavirus - SEPA open floodgates to lobster-killing chemicals! tinyurl.com/tjuou7 @ScottishEPA Emamectin benzoate is so toxic to shellfish it should be banned not used at higher concentrations & at unlicensed sites @TerryAHearn @SSPOsays @marinescotland



9:29 AM · Apr 9, 2020



 **Don Staniford**
@TheGAAIA



Secret Salmon - On the Trail of Imidacloprid Use in Scotland tinyurl.com/y6h55fo8 Has the toxic neonicotinoid been used illegally @WeAreBenchmark @FAlfarms at Ardtoe marine laboratory? @ScottishEPA @marinescotland @vmdgovuk @FerdOwner @MowiScotlandLtd @FergusEwingMSP #BMK08



 Fishfarmingexpert and 9 others

9:59 AM · Sep 4, 2020 · Twitter Web App

Notes to Editors:

[1] On 31 August 2020, the Scottish Government replied to Scottish Salmon Watch's [FOI request dated 8 July 2020](#).

From: <casehandling.service@gov.scot>
Date: Mon, Aug 31, 2020 at 5:06 PM
Subject: Your recent correspondence with Scottish Government and partner agencies - 202000058631
To: <salmonfarmingkills@gmail.com>

Please find attached a response to your correspondence.

Attachments:

22 Attachments

The image displays 22 PDF attachments arranged in a grid. Each attachment is represented by a thumbnail showing the top portion of a document. The documents are numbered 1 through 21, with the final one labeled 'finalResponse-202...'. The thumbnails contain various information, including meeting agendas for the All-Party Group on Aquaculture (APGA) on dates such as 17th December 2019, 19th December 2019, 16th March 2020, and 17th June 2020. Some thumbnails also feature logos for Marine Scotland and the Scottish Government. The documents appear to be responses or reports related to the FOI request.

Read a summary via [FOI reply from the Scottish Government on toxic chemical discharges via wellboats 31 Aug 2020](#)

[2] A FOI refusal letter from the Scottish Government to Scottish Salmon Watch dated 31 August 2020 included:

ANNEX

REASONS FOR NOT PROVIDING INFORMATION

5. (ii) An exception under regulation 10(4)(d) (Material in course of completion, unfinished documents or incomplete data) of the EIRs applies to some of the information you have requested

The exception under regulation 10(4)(d) of the EIRs (material in course of completion, unfinished documents or incomplete data) applies to some of the information you have requested because it is material still in the course of completion.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception.

We recognise that there is some public interest in release as part of open, transparent and accountable government. However, this is outweighed by the public interest in ensuring that unfinished or incomplete information which is still being worked on or is under active consideration is not disclosed when it might misinform the public or give a misleading impression of the Government's view or position on the matter to which the information relates.

The intention on the basis of the current Parliamentary timescales is that the finalised Order will come into force in November 2020.

5. (ii) An exception under regulation 10(4)(e) (internal communications) of the EIRs applies to some of the information you have requested

An exception under regulation 10(4)(e) of the EIRs (internal communications) applies to some of the information you have requested because it is internal communication between Scottish Government Ministers and/or officials about an amendment to the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011, which is required in order to transfer responsibility for the authorisation of discharges of chemical treatment residues to the water environment via a well boat from marine licensing to CAR licensing.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, there is greater public interest in high quality policy and decision-making, and in the properly considered implementation and development of policies and decisions.

This means that Ministers and officials need to be able to consider all available options and to debate these rigorously, to fully understand their possible implementations. Their candour in doing so will be affected by their assessment of whether the discussions on the amendment to the Marine Licensing (Exempted Activities) (Scottish Inshore Region) Order 2011 will be disclosed in the near future, when it may undermine or constrain the Government's view on that policy while it is still under discussion and development.

5. (ii) An exception under regulation 10(5)(d) (Confidentiality of proceedings) of the EIRs applies to some of the information you have requested

An exception under regulation 10(5)(d) of the EIRs (Confidentiality of proceedings) applies to some of the information you have requested because it is internal legal advice and disclosure would breach legal professional privilege.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. We recognise that there is a public interest in disclosing information as part of open, transparent and accountable government, and to inform public debate. However, this is outweighed by the strong public interest in maintaining the right to confidentiality of communications between legal advisers and clients, to ensure that Ministers and officials are able to receive legal advice in confidence, like any other public or private organisation.

Read in full via [FOI reply from the Scottish Government on toxic chemical discharges via wellboats 31 Aug 2020 Letter](#)

[3]

From: **Don Staniford** <salmonfarmingkills@gmail.com>
Date: Tue, Aug 25, 2020 at 3:07 PM
Subject: Additional Information re. SEPA 202000275
To: Karin Killington <kkillington@itspublicknowledge.info>, <wsneddon@itspublicknowledge.info>

Further to Scottish Salmon Watch's appeal filed on 21 February 2020 (posted online via <https://donstaniford.typepad.com/my-blog/2020/02/please-come-clean-on-bmk08-.html>):

Scottish Salmon Watch strongly believes that there is a public interest in the disclosure of information on 'CleanTreat' including BMK08 (Ectosan).

In fact, it was only in March 2020 that Scottish Salmon Watch discovered that BMK08/Ectosan was the toxic neonicotinoid insecticide Imidacloprid (banned by the EU in 2018 for use in terrestrial agriculture).

This was reported via The Ferret, ENDS and other publications in March 2020:

[Revealed: Toxic Neonicotinoid Insecticide Used to 'CleanTreat' Lousy Salmon](#)

[The Ferret: "Fish farm companies 'bidding to use bee-harming pesticide'"](#)

[ENDS Report: "Calls for greater transparency over 'toxic' new fish farm product"](#)

[Benchmark sea lice treatment identity revealed](#)

And it forced out a public statement by Benchmark (architects of the CleanTreat system which uses Imidacloprid/BMK08/Ectosan):

<https://www.benchmarkplc.com/news/bmk08/>

Suffice to say that this controversial disclosure adds considerable weight to Scottish Salmon Watch's appeal.

Moreover, Scottish Salmon Watch further revealed in May 2020 (via a FOI disclosure by SEPA) that salmon farming giant Mowi in March 2020 had asked SEPA to support a field trial of Ectosan (re-named BMK08 in November 2019) in Loch Ailort:

[Secret Trials: 'Royal' Salmon Doused with Bee-Killing Insecticide Imidacloprid?](#)

["Mowi asks to trial new lice drug in Scotland"](#)

The use of Imidacloprid warranted a letter to the Cabinet Secretary for the Environment from the Scottish Greens in May 2020:

[Scottish Greens "Deeply Concerned" at Mowi's Field Trial of Neonicotinoid Imidacloprid in Loch Ailort](#)

In June 2020, Scottish Salmon Watch published scientific opposition to the use of Imidacloprid (which Benchmark proposes to use via the CleanTreat system):

[Further Scientific Opposition to Imidacloprid Use in Salmon Farming](#)

[Scientific Opposition to Neonicotinoid Use in Salmon Farming](#)

[Backgrounder: "Imidacloprid - A Neonicotinoid Insecticide Toxic to Aquatic Life"](#)

Scottish Salmon Watch also published further details on the patents secured by Benchmark (information which we are not even sure that SEPA was in possession of):

[Patent lifts lid on neonicotinoid use in salmon farming](#)

The Sunday Times and BBC Radio featured the controversial issue in June 2020 and British Wildlife viewed the issue as such a public concern that they featured it in their Editorial in August 2020:

[Sunday Times: "Outlawed insecticide may be used on Scottish salmon"](#)

[BBC Farming Today on "Neonicotinoids in Salmon Farming"](#)

[British Wildlife: "Neonics in Salmon Farming - Alarm Bells Are Ringing"](#)

SEPA's refusal to disclose information on CleanTreat, BMK08, Ectosan and Imidacloprid is an affront to transparency and runs counter to their role as a publicly-funded watchdog for the environment. Scottish Salmon Watch believes that protecting the commercial interests of a Norwegian-funded industry at the expense of the Scottish environment is unacceptable and unreasonable.

It beggars belief that SEPA are placing the profits of Norway's 5th richest man (Johan Andresen - owner of Ferd Capital which controls Benchmark) before the Scottish environment and public accountability.

Read more via: [Follow the Salmoney - the Norwegian tobacco billionaire behind the Neonicotinoid Imidacloprid](#)

Scottish Salmon Watch asks the Scottish Information Commissioner to force the disclosure of information in the public interest. The considerable media coverage of the issue since March 2020 when it was publicly revealed that CleanTreat was a Trojan Horse designed to use a banned neonicotinoid insecticide is evidence enough.

Media coverage before Benchmark was forced to publicly admit that BMK08/Ectosan was Imidacloprid is available as reference via [Media coverage of Benchmark's 'CleanTreat', Ectosan and BMK08](#)

A time-line detailing how the use of Imidacloprid was secured via a patent in Norway back in 2011 is online via [Horrible History: Imidacloprid Use in Salmon Farming](#)

Please force SEPA to protect the Scottish environment rather than protect the commercial interests of a Norwegian company wanting to keep secret documents detailing the use of a toxic neonicotinoid insecticide.

If you require further information please do not hesitate to contact me on 07771 541826.

Please provide a receipt for this email.

Thanks,

Don Staniford

Director, Scottish Salmon Watch

From: **Wendy Snedden** <wsnedden@itspublicknowledge.info>

Date: Mon, Aug 17, 2020 at 4:24 PM

Subject: Application for Decision by the Scottish Information Commissioner - Scottish Salmon Watch and the Scottish Environment Protection Agency - 202000275

To: salmonfarmingkills@gmail.com <salmonfarmingkills@gmail.com>

Our Ref: 202000275

Date: 17 August 2020

Dear Mr Staniford

Application for Decision by the Scottish Information Commissioner

Applicant: Scottish Salmon Watch (SSW)

Public Authority: Scottish Environment Protection Agency (SEPA)

I refer to previous correspondence regarding SSW's application to the Commissioner. This relates to its information requests of 23 October 2019 to SEPA, seeking information concerning the treatment of wellboat discharges.

I will investigate SSW's application and will be your point of contact with this office. If you have any queries, or would like a progress report at any time, please contact me by email at wsnedden@itspublicknowledge.info.

Scope of investigation

My investigation will be limited to the matter raised in SSW's application to the Commissioner. This is to ascertain whether SEPA was entitled to withhold some of the information SSW requested (in part 6 of its request) under the exception in regulation 10(5)(e) (Confidentiality of commercial or industrial information) of the Environmental Information (Scotland) Regulations 2004 (the EIRs).

Public Interest Test

SEPA is withholding some of the information SSW asked for under an exception which is subject to the public interest test, i.e. regulation 10(5)(e) (Confidentiality of commercial or industrial information). More information about the public interest test can be found here:

<http://www.itspublicknowledge.info/Law/FOISA-EIRsGuidance/ThePublicInterestTest/ThePublicInterestTestEIRs.aspx>

This means that the Commissioner must balance the public interest in favour of disclosing the information against any public interest there may be in not disclosing it. I have already noted the public interest arguments set out in SSW's application to the Commissioner, and note your subsequent emails of 5 and 17 March 2020. Please let me have any additional comments SSW wishes to submit on why it believes disclosing the information would be in the public interest.

Please provide any further comments by close of business on **Tuesday, 1 September 2020**.

I will now contact SEPA and give it an opportunity to comment on SSW's application. The Commissioner is required, by law, to give authorities an opportunity to comment.

Once I have considered the submissions from both SSW and SEPA, I may contact you again to explore whether it is possible to resolve SSW's application without the need for a formal Decision Notice.

It is important that you let me know about anything which may be relevant to the investigation. If SEPA contacts you in relation to SSW's application, or if SSW finds it no

longer needs a decision from the Commissioner, please let me know as soon as possible. Please also let me know if your contact details change.

Over the last few months, we have received many more applications than usual and our office premises remain closed due to the impact of the Covid-19 pandemic, although staff are working remotely. This means there might be a slight delay in progressing SSW's application, however please be assured we will do so as quickly as possible.

I am now on leave until 31 August 2020, however my emails are being monitored in my absence. On my return, I will be working remotely, normally Mondays to Thursdays.

Information about what we do with the personal information you give us can be found in our Privacy Notice: <http://www.itspublicknowledge.info/home/privacy.aspx>. If you would like me to send you a hard copy of the notice, let me know.

It would be helpful if you could acknowledge receipt of this email.

Thank you for your assistance in this matter.

Yours sincerely

Wendy Snedden

Freedom of Information Officer

Scottish Information Commissioner

Kinburn Castle, Doubledykes Road

St Andrews, KY16 9DS

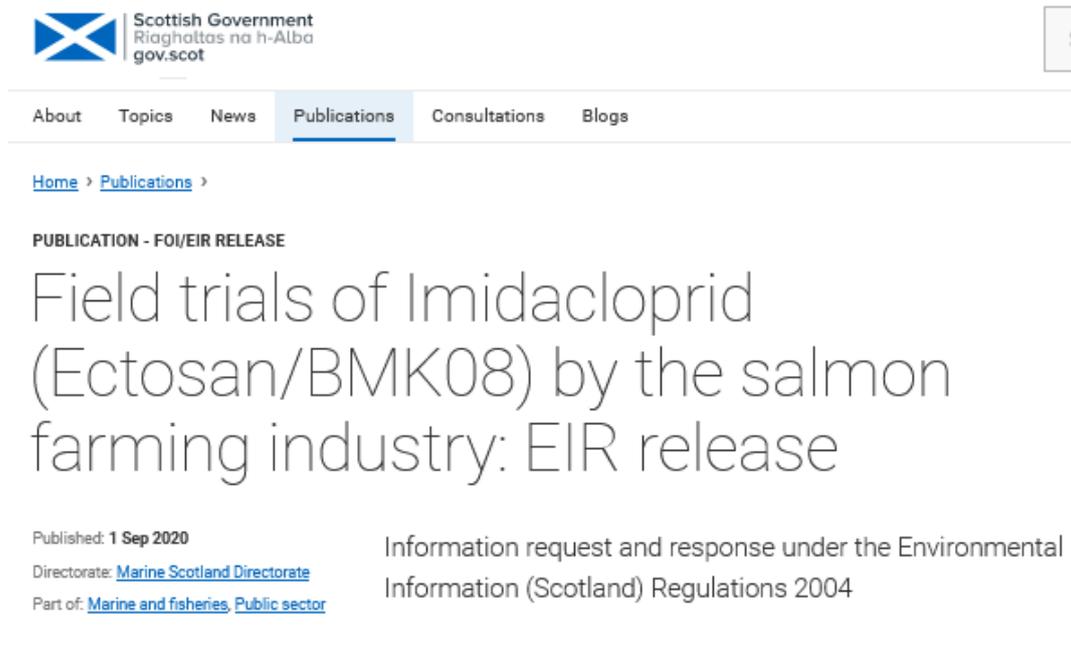
Email: wsnedden@itspublicknowledge.info

Web: www.itspublicknowledge.info

Twitter: [@FOIScotland](https://twitter.com/FOIScotland)

Read more via "[Please Come Clean on BMK08!](#)"

[4] On 1 September 2020, the Scottish Government [published a FOI reply on field trials of Imidacloprid \(Ectosan/BMK08\)](#):



Scottish Government
Riaghaltas na h-Alba
gov.scot

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PUBLICATION - FOI/EIR RELEASE

Field trials of Imidacloprid (Ectosan/BMK08) by the salmon farming industry: EIR release

Published: 1 Sep 2020
Directorate: [Marine Scotland Directorate](#)
Part of: [Marine and fisheries](#), [Public sector](#)

Information request and response under the Environmental Information (Scotland) Regulations 2004

FOI reference: FOI/202000038615

[5] On 2 September 2020, Scottish Salmon Watch [filed a formal request for a review of FOI-2020-00058631 with the Director of Marine Scotland](#):



Subject: FOI Review re. 2020-00058631 dated 31 August 2020

Date: 2 September 2020

To: Director of Marine Scotland

Please consider this a formal request for a review of [FOI-2020-00058631](#) replied to by the [Scottish Government on 31 Aug 2020](#). For easy reference, Scottish Salmon Watch's FOI request dated 8 July 2020 is available [online here](#).

In summary, Scottish Salmon Watch asks the Scottish Government to reconsider the refusal to disclose various documents and data. Please provide the information requested in July 2020.

Download in full [online here](#)

Scottish Salmon Watch [reported in December 2019](#):

Documents [disclosed to Scottish Salmon Watch by the Scottish Government via FOI in November 2019 \(FOI-19-02442\)](#) reveal huge quantities of toxic chemicals ([Azamethiphos, Deltamethrin and Hydrogen Peroxide](#)) discharged by well boats at salmon farms across Scotland in 2018. Here's thousands of litres of Hydrogen Peroxide ([recently shown by a scientific paper to kill kelp in the vicinity of salmon farms](#)) as well as Deltamethrin (AMX) and Azamethiphos (Salmosan) used by Grieg Seafood in Shetland [4]:

2018		Grieg Seafood Ltd					
Site	MCMS No.	Date	Time	Duration	Product	Amount	
Swinning 3	06131	15/01/2018	09:30	20 Mins	Peroxide and AMX	9940L and 720ml	
Swinning 3	06131	15/01/2018	15:00	20 Mins	Peroxide and AMX	9940L and 720ml	
Swinning 3	06131	16/01/2018	09:20	20 Mins	Peroxide and AMX	9790L and 720ml	
Swinning 3	06131	16/01/2018	15:40	20 Mins	Peroxide and AMX	9790L and 720ml	
Swinning 3	06131	16/01/2018	17:30	20 Mins	Peroxide and AMX	9790L and 720ml	
Swinning 3	06131	18/01/2018	08:40	20 Mins	Peroxide and AMX	9640L and 720ml	
Swinning 3	06131	18/01/2018	13:25	20 Mins	Peroxide and AMX	9640L and 720ml	
Swinning 3	06131	19/01/2018	08:45	20 Mins	Peroxide and AMX	9640L and 720ml	
Swinning 3	06131	19/01/2018	14:00	20 Mins	Peroxide and AMX	9640L and 720ml	
Settemess South	06121	23/01/2018	10:00	20 Mins	Salmosan	720g	
Settemess South	06121	23/01/2018	16:30	20 Mins	Salmosan	720g	
Settemess North	06122	18/01/2018	10:20	20 Mins	Salmosan	360g	
Settemess North	06122	19/01/2018	09:00	20 Mins	Salmosan	180g	
Settemess North	06122	20/01/2018	09:00	20 Mins	Salmosan	720g	
Settemess North	06122	20/01/2018	14:40	20 Mins	Salmosan	720g	
Settemess North	06122	21/01/2018	09:55	20 Mins	Salmosan	360g	
Settemess North	06122	22/01/2018	10:20	20 Mins	Salmosan	720g	
Settemess North	06122	22/01/2018	19:40	20 Mins	Salmosan	720g	
Swinning 3	06131	14/05/2018	15:30	20 Mins	Peroxide and AMX	2921L and 200ml	
Swinning 3	06131	15/05/2018	10:00	20 Mins	Peroxide and AMX	5374L and 400ml	
Swinning 3	06131	15/05/2018	13:00	20 Mins	Peroxide and AMX	5374L and 400ml	
Swinning 3	06131	15/05/2018	16:00	20 Mins	Peroxide and AMX	5374L and 400ml	
Swinning 3	06131	16/05/2018	12:00	20 Mins	Peroxide and AMX	5072L and 400ml	
Swinning 3	06131	16/05/2018	16:00	20 Mins	Peroxide and AMX	5072L and 400ml	
Swinning 3	06131	17/05/2018	10:00	20 Mins	Peroxide and AMX	4417L and 400ml	
Swinning 3	06131	17/05/2018	15:30	20 Mins	Peroxide and AMX	4417L and 400ml	
Settemess North	06122	18/05/2018	10:05	20 Mins	Peroxide and Salmosan	5400L and 360g	
Settemess North	06122	19/05/2018	09:25	20 Mins	Peroxide and Salmosan	10800L and 720g	
Settemess North	06122	19/05/2018	15:40	20 Mins	Peroxide and Salmosan	10800L and 720g	
Settemess North	06122	20/05/2018	10:00	20 Mins	Peroxide and Salmosan	8100L and 540g	
Settemess North	06122	20/05/2018	15:30	20 Mins	Peroxide and Salmosan	8100L and 540g	
Settemess North	06122	21/05/2018	19:00	20 Mins	Peroxide and Salmosan	5400L and 360g	

And here's [data showing illegal use and toxic discharges by The Scottish Salmon Company at Vuia Beag in Loch Roag of Benchmark's Salmosan Vet \(Azamethiphos - a chemical shown by peer-reviewed science to be lethal to lobsters\)](#):

2018		The Scottish Salmon Company					
Site	MCMS No.	Date	Time	Duration	Product	Amount	
Vuia Beag	No Licence	14/07/2018	09:34	30 Mins	Salmosan Vet	200g	
Vuia Beag	No Licence	15/07/2018	09:46	30 Mins	Salmosan Vet	200g	
Vuia Beag	No Licence	21/07/2018	09:46	30 Mins	Salmosan Vet	200g	
Vuia Beag	No Licence	22/07/2018	09:34	30 Mins	Salmosan Vet	200g	
Vuia Beag	No Licence	03/08/2018	12:00	30 Mins	Salmosan Vet	200g	
Vuia Beag	No Licence	04/08/2018	12:10	30 Mins	Salmosan Vet	200g	
Vuia Beag	No Licence	05/08/2018	12:02	30 Mins	Salmosan Vet	200g	
Taranaish	06397	03/10/2018	02:35	40 Mins	Azasure/AMX	400g and 400ml	
Taranaish	06397	04/10/2018	03:20	40 Mins	Azasure/AMX	400g and 400ml	
Taranaish	06397	04/10/2018	08:20	40 Mins	Azasure/AMX	400g and 400ml	
Taranaish	06397	04/10/2018	18:50	40 Mins	Azasure/AMX	400g and 400ml	
Procrapol	06199	15/06/2018	00:23	1 Hour	Salmosan	180g	
Procrapol	06199	15/06/2018	20:38	1 Hour	Salmosan	180g	
Procrapol	06199	22/06/2018	01:25	1 Hour	Salmosan	180g	
Procrapol	06199	22/06/2018	23:25	1 Hour	Salmosan	180g	
Procrapol	06199	21/06/2018	17:22	1 Hour	Salmosan	180g	
Procrapol	06199	22/06/2018	21:28	1 Hour	Salmosan	180g	
Procrapol	06199	22/06/2018	15:45	1 Hour	Salmosan	180g	
Procrapol	06199	16/06/2018	08:05	1 Hour	Salmosan	180g	
Procrapol	06199	09/06/2018	21:22	1 Hour	Salmosan	180g	
Procrapol	06199	09/06/2018	12:36	1 Hour	Salmosan	180g	
Procrapol	06199	08/12/2018	14:00	1 Hour	Azasure	100g	
Procrapol	06199	08/12/2018	15:05	30 Mins	AMX	125ml	
Procrapol	06199	08/12/2018	17:00	1 Hour	Azasure	100g	
Procrapol	06199	08/12/2018	18:00	30 Mins	AMX	125ml	
Procrapol	06199	08/12/2018	20:20	1 Hour	Azasure	100g	
Procrapol	06199	09/12/2018	21:25	30 Mins	AMX	250ml	

Read more via:

[Press Release: Cleaning Tox-Sick Scottish Salmon](#)

[CleanTreat FOI Disclosures by the Scottish Government to Scottish Salmon Watch](#)

[Media Backgrounder: Chemically Embalmed Scottish Salmon](#)

[Discharge of salmon farming well boats: EIR release](#)