

FOI Dossier on Wester Ross Fisheries Processing Plant in Dingwall (24 March 2014)

- 'Seriously Non-Compliant' effluent & "illegal discharge" causes river of waste, contaminated water, fish scales, sewerage fungus, fish guts and 'odour issues'



Source material obtained via Freedom of Information (FOI) in February 2014 from Scottish Water, Highland Council and the Scottish Environment Protection Agency (SEPA) - key documents available [online here](#)

Summary:

Discharge data from 2005 to 2014 provided by Scottish Water revealed 129 "parameter failures" including 58 "serious parameter failures" (a 17.25% failure rate) - including an 80% failure rate for 'free oil and grease' leading to an overall assessment in February 2014 of "Seriously Non-Compliant".

Wester Ross Fisheries received repeated warning letters from Scottish Water for "parameter failure" and "serious parameter failure" relating to "illegal discharge" of effluent. Scottish Water have issued repeated "Notification of Non-Compliance" and "Notification of Serious Non-Compliance" letters for breaches of total suspended solids, biological oxygen demand and solvent extractable material (fats oils & greases).

Minutes of a meeting in May 2012 between Scottish Water and Wester Ross Fisheries reported that the Waste Water Treatment Plant at Dingwall "was still reporting fish scales entering the works on a regular basis".

In 2011, SEPA reported that "odour issues" had been "ongoing for 6-8 years" with lorries "leaching contaminated water" which is "entering the drains and then running untreated into the River Peffrey".

Highland Council wrote to Wester Ross Fisheries in 2011, 2010 and 2009 reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996. One contravention in 2010 stated that: "the vacuum packs stored uncovered in the box store are open to contamination by condensation falling from the metal roof". Another in

2010 stated that: "the brush strip at the Despatch Door of the factory was missing allowing pests access to the premises".

In 2010, Scottish Water wrote to Wester Ross Fisheries stating that they were "greatly concerned about the large quantities of fish scales appearing at the Dingwall Wastewater Treatment Plant". According to Scottish Water, the fish scales from the farmed salmon processing plant were "choking the inlet screens".

In 2010, SEPA recorded an 'Environmental Event Report' following a complaint regarding "oil in gully pot" and an inspection which found "pools of blood on the road". In 2009, SEPA recorded an 'Environmental Event Report' following a complaint detailing "fish waste discharged into River Peffery". SEPA found "evidence of fish waste in the river" with "scales and fish guts evident from the surface water drain downstream" and "evidence of sewage fungus growing within the river".

Wester Ross Fisheries told Scottish Water in 2008 that they "are encountering problems with our plan to install fat trap" and "will have to look at a much bigger trap". In 2006, Scottish Water reported "a large amount of fish fins/parts of tails" entering the Wastewater Treatment Plant in Dingwall. In 2005, minutes of a meeting between Scottish Water and Wester Ross Salmon reported "high fat recordings".

Background:

The [Peffery Restoration Project](#) is a project that is bringing together Cromarty Firth Fisheries Trust (CFFT), Cromarty Firth District Salmon Fishery Board (CFDSFB), Moray Firth Sea Trout Project (MFSTP), Area Advisory Group (AAG), Scottish Environment Protection Agency (SEPA), Scottish Water, Moray Firth Partnership (MFP), landowners, Forestry Commission, Dingwall Environment Group (DEG) and Trust for Conservation Volunteers (TCV) to work towards the restoration of the entire River Peffery catchment (read more [online here](#)).

Both SEPA and Scottish Water admitted that they did NOT monitor for sea lice in effluent - despite a scientific paper [published in the Journal of Aquatic Animal Health](#) in December 2013. "Marine salmon farms and their processing facilities can serve as sources of virulent fish pathogens," reported the scientific paper '[Fish Processing Facilities: New Challenge to Marine Biosecurity in Canada](#)'. "We found live salmon lice *Lepeophtheirus salmonis*, mucus, and fish tissue in effluent from the processing facility. Sea lice transmitted from this source may pose a threat to wild salmon populations, and the release of untreated offal, including blood water, is of considerable concern. Further research is needed to quantify the extent to which processing facilities release sea lice and to determine whether more virulent fish pathogens are present in effluent. These data underscore the need for fish farming nations to develop mandatory biosecurity programs to ensure that farmed salmon processing facilities will prevent the broadcast of infectious fish pathogens into wild fish habitat." "Behavioral cues during microscope observation confirmed that the parasites were alive: eggs hatched into nauplii, and both the males and gravid females showed mobility," reported the scientific study.

“Sea lice and other disease vectors transmitted from facilities processing farmed fish from across the province may pose a threat to wild salmon populations,” said University of

Victoria marine ecologist Dr. John Volpe, a co-author of the paper in a [press release](#) (19 December 2013). "Our study demonstrates that disease transmission is possible from farmed fish to wild fish through the tissue, blood and mucus released in untreated farmed salmon offal. If live sea lice eggs are pouring out of farmed salmon processing plants, it is likely that infectious bacteria and viruses are as well," says Volpe, adding that more research is needed to determine the extent of sea lice release and whether more virulent fish pathogens are present in fish farm effluent.

Data [published by the Scottish Salmon Producers Organisation](#) reveals that salmon farms in Wester Ross are infested with sea lice (read more via the West Highland Free Press: "[Wester Ross fish farms under fire over sea lice outbreaks](#)"). In March 2014, the Salmon & Trout Association [reported](#):

"The latest SSPO quarterly sea lice report (for October to December) reveals that average lice numbers were over thresholds in 13 out of 30 areas for which data is reported by the industry. Particular hotspots yet again included 'Kennart to Gruinard' in Wester Ross where there are seven farms operated by two companies, Wester Ross Fisheries Limited and Scottish Sea Farms Limited. The monthly lice count on farms in this area was between five and ten times the threshold between October and December last year. Lice have been over the threshold in this area for an entire year now, despite three area-wide treatments and a staggering 25 other treatments for lice."

In December 2013, the Salmon & Trout Association stated that Wester Ross Fisheries had "[an appalling sea lice record](#)". "The sea-lice numbers in the region where Wester Ross Fisheries have all their marine farms are shocking and the salmon farmers in these areas have lost all control," claimed the S&TA in a [press release](#) (12 December 2013).

A FOI reply from the Animal Health and Veterinary Laboratories Agency in February 2014 [revealed](#) that in October 2013 "sea lice numbers were rising" at Wester Ross Fisheries and the farmed salmon had "severe proliferative gill disease". Last year, Protect Wild Scotland [revealed](#) that Wester Ross Fisheries had been guilty of over a decade of "unsatisfactory" pollution and non-compliance at their salmon farm sites in Wester Ross (according to [data supplied by SEPA via FOI](#) in September 2013).

Information obtained by Protect Wild Scotland from SEPA via Freedom of Information in September 2013 revealed that Wester Ross Fisheries (Wester Ross Salmon) has breached pollution limits for over a decade at their salmon farm sites in Little Loch Broom, Loch Broom, Loch Kannaird and Elphin Hatchery (read more via "["Unsatisfactory" Wester Ross Salmon – A Decade of Pollution!](#)").

"In view of the recent scientific concerns raised in Canada, Protect Wild Scotland urges SEPA, Scottish Water and local authorities across Scotland to convene a task force to tackle the threats of the spread of sea lice and infectious diseases via processing plant effluent," wrote Protect Wild Scotland in a [letter \(7 March 2014\) to Scottish Water, SEPA, Highland Council and other agencies](#). "Please help protect wild salmonids from the threats posed by processing plants discharging diseased wastes into Scotland's waterways. It beggars belief that no public agency appears to be monitoring for sea lice and infectious diseases in processing plant effluent."

The FOI requests to Scottish Water, Highland Council and the Scottish Environment Protection Agency were prompted by testimony in January 2014 from whistleblower John Craig - a former employee at the Wester Ross Fisheries processing plant in Dingwall:

OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:-

Firstly the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was where the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.

I sincerely hope the foregoing will be of some assistance and enlightenment to you and if I can be of any further assistance please do not hesitate to ask.

Regards,

A handwritten signature in black ink, appearing to read "John Craig". The signature is written in a cursive style with a large, looped initial 'J' and a long, sweeping tail that extends downwards and to the right.

Documents obtained via Freedom of Information (FOI) from Scottish Water (27 February); Highland Council (13 February) and the Scottish Environment Protection Agency (11 February) - access FOI documents [online here](#):

Scottish Water explained in February 2014: "This company [Wester Ross Fisheries] has had a consent to discharge effluent to sewer since at least 1998 when it was consented by NoSWA. The consent and subsequent amendments to it would contain limits for volume, flow and normal sanitary determinands such as pH, suspended solids, biochemical and chemical oxygen demand and fats/oils, but we would never have restricted or monitored for the discharge of sea lice or their eggs. All analytical information would relate the parameters contained in the consent. Scottish Water would not monitor environmental health issues as these are the responsibility of the local council's Environmental Health department. Inspection reports would relate to the sample point - assessing it from a safety point of view. Any pollution incident reports would relate to breaches of the limits contained in the consent. Scottish Water doesn't monitor for sea lice or infectious diseases in an effluent monitoring programme."

The consent issued by Scottish Water to Wester Ross Fisheries (October 2011) includes:

Direction Registration Number: 4213A/4/D
Premises Reference Number: 4213

Scottish Water

Sewerage (Scotland) Act 1968, Section 32

Consent

THIS IS A LEGAL DOCUMENT WHICH DETAILS YOUR COMPANY'S AUTHORISATION TO DISCHARGE TRADE EFFLUENT INTO THE PUBLIC SEWER FROM THE PREMISES STATED.

ITS CONTENTS SHOULD BE NOTED, AND THE DOCUMENT KEPT IN A SAFE PLACE FOR FUTURE REFERENCE.

The Preamble

WHEREAS Wester Ross Fisheries Ltd ("the occupier"), Company registration number SC297376, whose registered office is situated at Kinnaird House, Ardmair, Ullapool, IV26 2TN, and are the occupiers of the trade premises situated at Taigh Na Bradan, Strath View, Dingwall Business Park, Dingwall, IV15 9XD ("the trade premises"), has requested Scottish Water ("SW"), established under Section 20 of the Water Industry (Scotland) Act 2002 and having its principal office at Castle House, 6 Castle Drive, Carnegie Campus, Dunfermline, Fife, KY11 8GG, or its predecessor, to consent to a discharge of trade effluent into the public sewers, and had received from them such Consent effective **14 (fourteenth) December 1998.**

NOW THEREFORE, through the powers conferred on Scottish Water by the Sewerage (Scotland) Act 1968 and by any Act amending or replacing the same, Scottish Water HEREBY DIRECTS that the above mentioned Consent be reviewed by deletion of all the existing conditions of that Consent, and of any conditions imposed by any subsequent Directions, and replacement of these by the text that follows, with effect from **10 (tenth) October 2011, SUBJECT TO THE FOLLOWING CONDITIONS:**

1. Point of discharge

The trade effluent shall be discharged into SW's public foul or combined sewer ("the sewer") only at the point indicated on the plan attached hereto. The written consent of SW must be obtained before any change is made to the location of this discharge point.

2. Nature of discharge

The trade effluent discharged shall consist solely of waste liquids arising from the process(es) listed:

Salmon processing

3. Limits on volume, rate, discharge period, temperature and pH of the trade effluent

- 3.1 The maximum volume of trade effluent discharged to the sewer in any one period of 24 hours shall not exceed **twenty (20)** cubic metres (m³).
- 3.2 The maximum rate at which trade effluent may be discharged shall not exceed **one (1)** litre per second (l/s).
- 3.3 The temperature of the trade effluent shall not exceed **forty (40)** degrees Celsius when measured at the inspection chamber specified in Clause 5.1.
- 3.4 The pH value of the trade effluent shall not be less than **five (5)** nor greater than **eleven (11)**.
- 3.5 Trade effluent shall only be discharged during the following period(s):

The daily period of working

4. Substances to be limited and prohibitions

- 4.1 There shall be eliminated from the trade effluent before it enters the sewer any matter or constituent, which, either alone or in combination with any matter with which it is likely to come into contact while passing through any sewers, would be likely to injure or obstruct those sewers or make specially difficult or expensive the treatment or disposal of the sewage from those sewers, or be prejudicial to health.
- 4.2 Without prejudice to the foregoing generality of clause 4.1,
 - i) substances listed in **Appendix I** attached hereto shall not be permitted in the trade effluent at levels above their background concentration as defined in clause 4.5 below, and any additional concentration of such substances shall be **eliminated** from the trade effluent unless they are specifically authorised in section 4.3 below.
 - ii) no toxic or inhibitory substances shall be discharged other than those listed in clause 4.3 below, which may be discharged **only to the limits herein specified**.
- 4.3 Substances to be limited in the Trade Effluent:

Substance	Limit	Unit
Biochemical Oxygen Demand (Settled)	2000	mg/l
Biochemical Oxygen Demand Load (Settled)	25	kg/day
Chemical Oxygen Demand (Settled)	4500	mg/l
Suspended Solids (Total)	1000	mg/l
Suspended Solids Load (Total)	16	kg/day
Solvent Extractable Material	400	mg/l

*****END OF LIST OF SUBSTANCES*****

Read the consent issued by Scottish Water in October 2011 in full [online here](#)

Discharge data from 2005 to 2014 provided by Scottish Water revealed 129 "failures" including 58 "serious parameter failures" (a 17.25% failure rate) - including an 80% failure rate for 'free oil and grease' - leading to an overall assessment of "Seriously Non-Compliant".

Report Conditions	
Report No:	SWR0055
Report Conditions Description:	This report displays data on Authorised Samples in the Report Period.
Report Criteria	
Discharge point code:	4213A
Customer:	Wester Ross Fisheries Ltd
Sample date from:	01/01/2002
Sample date to:	20/02/2014

Discharge Point Code:	4213A
Customer Name:	Wester Ross Fisheries Ltd
Sample date from:	01/01/2002
Sample date to:	20/02/2014
Compliance status for this period:	Seriously Non-Compliant
Exceedance	25
Parameter fails	46
Serious parameter fails	58
Total number of failures	129
Percentage passed	82.75 %

Determinand	Biochemical Oxygen Demand (Settled)	Chemical Oxygen Demand (Settled)	Chemical Oxygen Demand (Settled)	Free Oil and Grease	pH	pH	Solvent Extractabl	Suspended Solids (Total)
Consent limit date from:	01/03/2004	01/03/2006	10/10/2011	14/12/1998	14/12/1998	01/03/2006	10/10/2011	01/03/2004
Minimum limit:					6.00	5.00		
Maximum limit:	2,000.00	2,000.00	4,500.00	100.00	10.00	11.00	400.00	1,000.00
Unit of measure:	mg/l	mg/l	mg/l	mg/l	pH	pH	mg/l	mg/l
Failures	Exceedance	6	7				3	9
	Parameter fails	14	8	6			5	13
	Serious parameter fails	1	16	31			2	8
	Percentage passed	87 %	68 %	100 %	20 %	100 %	100 %	82 %

Read the Excel spreadsheet in full [online here](#)

In October 2013, Alan Kellock of Scottish Water emailed David Robinson of Wester Ross Fisheries:

From: Alan Kellock
Sent: 01 October 2013 15:48
To: David Robinson
Subject: RE: telephone call

David ,

No worries we had a problem at the WWTP this afternoon with a strong fish processing influent effecting the Process, this problem has been traced to a spillage and overflow at another fish processor in Dingwall

Regards

Alan

In August 2012, Wester Ross Fisheries received a warning letter for "parameter failure" relating to "an illegal discharge":

Attn Mr David Robinson
Wester Ross Fisheries Limited
Strath View
Dingwall Business Park
IV15 9XD

SCOTTISH WATER

31 Henderson Drive
Longman North
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855
F: 01463 712846

W: www.scottishwater.co.uk

3/8/2012

Dear Mr Robinson,

Trade Effluent Consent Reference 4213A

Warning Letter: Parameter Failure

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a parameter failure (see attached analysis report) and therefore the effluent constitutes an illegal discharge.

All actions necessary to return your discharge to compliance must be carried out within the shortest timescale possible.

Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

In May 2012, Wester Ross Fisheries received a warning letter for a parameter failure and "illegal discharge":

Attn Mr David Robinson
Wester Ross Fisheries Limited
Strath View
Dingwall Business Park
IV15 9XD

SCOTTISH WATER

31 Henderson Drive
Longman North
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855

F: 01463 712846

W: www.scottishwater.co.uk

2/5/2012

Dear Mr Robinson,

Trade Effluent Consent Reference 4213A

Warning Letter: Parameter Failure

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a parameter failure (see attached analysis report) and therefore the effluent constitutes an illegal discharge.

All actions necessary to return your discharge to compliance must be carried out within the shortest timescale possible.

Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

Later in May 2012, Wester Ross Fisheries received a warning letter for a "serious parameter failure":

Attn David Robinson
Wester Ross Fisheries
Taigh Na Braden
Strath View
Dingwall Business Park
Dingwall
IV15 9XD

SCOTTISH WATER

31 Henderson drive
Longman North
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855
F: 01463 712846

W: www.scottishwater.co.uk

9 May 2012

Dear Mr Robinson,

**Trade Effluent Consent Reference: 4213A
Warning Letter: Serious Parameter Failure**

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a serious parameter failure (see attached analysis report).

Please note that it is a criminal offence to breach the limits specified in a Consent.

All actions necessary to return your discharge to compliance must be carried out within the shortest timescale possible. Please supply a report detailing the actions to be taken, including the timescale, within 10 working days of this letter.

Should you fail to respond within the timescale, or undertake the necessary improvements timeously, we will have no option but to instigate further enforcement action, including formal sampling. Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

Minutes of a meeting in May 2012 between Scottish Water and Wester Ross Fisheries reported that the Waste Water Treatment Plant at Dingwall "was still reporting fish scales entering the works on a regular basis":

120531 Wester Ross Fisheries Limited

Present Alan Kellock Scottish Water

David Robinson Director WRF

Compliance over last 12 months was 89% but suspect SEM fails parameter was 66%, AK detailed the results and told DR that the SEM results would not be registered on compliance until the lab query had been sorted out.

The screening f screening system was fully operational at WRS it was pointed out to DR that the WWTP at Dingwall was still reporting fish scales entering the works on a regular basis.

DR would look into house keeping regime , and also get balancing tank cleaned out .

AK suggested that he contacted Horizons to get the sump waste taken away along with the ESS waste to the AD facility at Deerdykes.

In December 2011, Wester Ross Fisheries received a "Notification of Non-Compliance" for breaching total suspended solids:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

111207-4213A-LET

Notification of a Non Compliance

Attn David Robinson

Sample no. 5399408

Company name: Wester Ross Fisheries
SPID: 101120400201

A parameter fail of a limit specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 1/12/2011

1388 mg/l Suspended Solids (Total) – The Consented limit is 1000 mg/l.

In December 2011, Wester Ross Fisheries received a "Notification of Non-Compliance" for breaching SEM and BOD:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

111216-4213A-LET

Notification of a Non Compliance

Attn David Robinson

Sample no. 5399408

Company name: Wester Ross Fisheries
SPID: 101120400201

A parameter fail of a limit specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 1/12/2011

652mg/l SEM – The Consented limit is 400mg/l.
3017 mg/l BOD – The consent limit is 2000 mg/l

In November 2011, Wester Ross Fisheries received a "Notification of Non-Compliance" for breaching solvent extractable material (fats oils & greases):



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Non Compliance

Attn David Robinson

Sample no. 5371028

Company name: Wester Ross Fisheries
SPID: 101120400201

A parameter fail of a limit specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 8/11/2011

529 mg/l Solvent Extractable Material (fats oils & greases) – The Consented limit is 400 mg/l.

In August 2011, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996:



Mr David Robinson
Wester Ross Fisheries
4 Strathview
Dingwall Business Park
Dingwall
IV15 9XD

Please ask for: *Clifford Smith*
Direct Dial: *01349 868489*
E-mail: *env.health@highland.gov.uk*
Your ref:
Our ref: *CS/Food*
Date: *23rd August 2011*

Dear Sir

**FOOD SAFETY ACT 1990
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006
PREMISES: Wester Ross Fisheries Ltd, Dingwall.**

I refer to the inspection of the above premises on 22nd July 2011.

The attached schedule details the outcome of the inspection. Any contraventions identified in the schedule require your immediate attention.

Should you disagree with the requirements of the enclosed Schedule you should make representation to Alistair Thomson, Head of Environmental Health and Trading Standards, within two weeks of receipt of this letter by writing to the address below or calling 01463 228700. The booklet "Food Law Inspections and Your Business" outlines your rights and is available from this office on request.

Publication of this report

Please note that the attached schedule will be placed on the Highland Council's public internet website (www.highland.gov.uk) within 14 days of the report being sent to you. This is in accordance with the Highland Council's Publication Scheme to ensure compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

If you require any further information or advice please do not hesitate to contact me on the above number.

Yours faithfully

CLIFFORD SMITH
Environmental Health Officer
Transport, Environment and Community Services – Environmental Health

Schedule

FOOD SAFETY ACT 1990 FOOD HYGIENE (SCOTLAND) REGULATIONS 2006

Premises Name:	Wester Ross Fisheries Ltd
Premises Address:	4 Strathview, Dingwall Business Park, Dingwall, IV15 9XD
Type of Premises:	Manufacturer and Processor
Date and time of inspection:	22 nd July 2011
Type of Inspection:	Food Safety and Food Standards
Areas Inspected:	Factory, Stores, Containers, Welfare Areas
Records/Documents examined:	HACCP Management System, Harvest records, Training and Production Records
Samples Procured:	None

Note

This schedule only covers the areas inspected as they were found at the time of the inspection. It should not be inferred that all hazards and defects within the premises have been identified. The responsibility for complying with legislation lies with the proprietor and your own checks should be carried out as a matter of routine.

This schedule contains **contraventions** and **recommendations**. **Contraventions** are items that must be addressed to ensure your compliance with the above legislation. **Recommendations** are items I strongly recommend be adopted as good practice although they are not direct requirements in terms of the above regulations. All recommendations appear in *italic* type. When considering work to deal with contraventions there may be other ways of achieving compliance with the law than those I have suggested. Alternatives may be used provided they are of equivalent effect. If you are in doubt as to the acceptability of alternatives please contact me.

Please note that Regulation 17 of the Food Hygiene (Scotland) Regulations 2006 makes it an offence to contravene or fail to comply with the requirements of EC Regulations 852/2004 and 853/2004. Regulation 4 of the General Food Regulations 2004 makes it an offence to contravene or fail to comply with the requirements of EC Regulations 178/2002.

Food Safety Contraventions

1. The concrete apron at the dispatch area of the factory is open and broken at the drainage channels. You are required to renew or repair the concrete area to ensure it presents a sound easy to clean condition. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter 1 Paragraph 1*)
2. The concrete apron at the fish reception area of the factory is open and broken at the drainage channels. You are required to renew or repair the concrete area to ensure it presents a sound easy to clean condition. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter 1 Paragraph 1*)

Transport, Environmental and Community Services

The Highland Council, Ross House, High Street, Dingwall, IV15 9YN
Tel: 01348 868489 Fax: 01349 868594 e-mail: env.health@highland.gov.uk www.highland.gov.uk

Food Safety (General)

I would be obliged if you could furnish me with an up to date copy of the Food Safety Hazard Management System for the factory for inclusion in the food file of your business held by this service

Read the correspondence with Highland Council in full [online here](#)

In July 2011, SEPA reported that "odour issues" had been "ongoing for 6-8 years" with lorries "leaching contaminated water" which is "entering the drains and then running untreated into the River Peffrey":

Dingwall Business Park Odour Issues Meeting
6 July 2011
Hebrides, SEPA, Dingwall
10:00-11:00

Present: John Macdonald Unit Manager, SEPA (JM)
 Lucy Gregson, EPO, SEPA (LG)
 Alan Kellock, Scottish Water (AL)
 Colin MacDonald, Edinburgh Smoked Salmon Company (CM)
 David Robinson, Wester Ross Fisheries (DR)
 Nick Thornton, Environmental health (NT)

Minutes: Kerry Lancaster, SEPA (KL)

	ACTION
<u>Overview of Issues</u>	
<p>The issues relating to Dingwall Business park have been ongoing for 6-8 years and there are several issues that are believed to be causing the odour issues at the Dingwall Business Park:</p> <ol style="list-style-type: none"> 1. Lorries are leaching contaminated water into the surface water drains. This is becoming concentrated due to the blocked drains then degrading causing the odour. The vehicles are being loaded outside company premises causing the leak of contaminated water from the Lorries into the drains instead of the company's treatment system. This is an issue as trade effluent entering the drains and then running untreated into the River Peffrey is unacceptable and an illegal act as this is not a licensed process. Edinburgh Smoked Salmon Company have only been loading the truck outside the compound for the last 6-8 weeks and as of Monday 11 July all of their trucks will be filled within their compound. Wester Ross Fisheries are loading the trucks outside of the company compound as their yard is not large enough to take articulated lorries. 2. The buildings that are built on the park are all fitted with durgo valves which trap the odour inside the building as they have no water vents. Therefore maintenance of the valves in the building may help relieve the issue. 3. The road gulleys along the business park need repaired/maintained as they are or have begun to collapse due to the volume of traffic. The drains need to be cleaned and then if there are other causes of the odour these can be pinpointed and then resolved. 	

<p><u>Future Plans</u></p> <p>Long term plans for the Fish factories are:</p> <ul style="list-style-type: none"> • Edinburgh Smoked Salmon Company is to extend their premises and include a specific entrance with drainage and its own treatment plant. The gutting will be self contained. They will find out if planning permission has been granted by the end of the month. • Wester Ross Fisheries plans are to extend the premises so articulated lorries can be filled with their grounds, however no time line for this as yet. 	
<p><u>Action Points</u></p> <ol style="list-style-type: none"> 1. Wester Ross Fisheries and Edinburgh Smoked Salmon Company to overlook and review procedures to see how they can minimise the loss of contaminated water from the trucks. 2. Provide haulage details to LG for her to send a duty of care letter. 3. Find out who has ownership/responsibility of the roads is it the Highland Council? 4. LG to issue letter to Ian Haye (Roads and Transport Highland Council) regarding drain cleaning and gully repairs, NT to receive a cc. 5. LG to inform CMDR of when the drains are to be cleaned so they can arrange for staff to park elsewhere. 6. SEPA to contact their facilities department to ensure the Durgo valves are being maintained in order to minimise the odour inside the building. 	<p>CM/DR</p> <p>CM/DR</p> <p>NT</p> <p>LG</p> <p>LG</p> <p>JM</p>

Read document online via [SEPA 2011 Odour issues meeting](#)

In May 2011, Wester Ross Fisheries received a "Notification of Significant Non-Compliance" for breaching the chemical oxygen demand limit by over two times:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Attn David Robinson

Sample no.5180999

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 3/5/2011

4385 mg/l Chemical Oxygen Demand – The Consented limit is 2000 mg/l

In May 2011, Wester Ross Fisheries received a "Notification of Significant Non-Compliance" for breaching total suspended solids:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Attn David Robinson

Sample no.5180999

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 3/5/2011

1433 mg/l Total Suspended Solids – The Consented limit is 1000 mg/l

In April 2011, Scottish Water issued a "Notification of a Significant Non Compliance" for a breach of chemical oxygen demand:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Attn David Robinson

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 5/4/2011

3140 mg/l Chemical Oxygen Demand – The Consented limit is 2000 mg/l

Minutes of a meeting in March 2011 between Scottish Water and Wester Ross Fisheries referred to an increase in the SEM parameter "and this would further help increase compliance":

110317 Wester Ross Fisheries

Dingwall 4213A

Present Alan Kellock Scottish Water
David Robinson Wester Ross Fisheries

Compliance

Rolling 12 months compliance showed 87% overall compliance and 92% from installation of new balancing and screening set up (November 2011).

The current consent dated back to 2006 and was due to be reviewed, the new SEM method required that the SEM parameter should be increased and this would further help compliance.

DR would complete and submit a new form H

No short term future plans which would effect volume usage, but DR was currently looking for a source for the sludge accumulating in the new settlement tank.

In 2010, minutes of a meeting between Scottish Water and Wester Ross Fisheries (13 January) recorded that compliance was only 41% with FOG (free oil and grease) at only 29% compliance. "Fish scales had been appearing in large quantities," reported the minutes:

100113 Wester Ross Fisheries

Present Alan Kellock Scottish Water
David Robinson – MD Wester Ross Fisheries Limited

Compliance, 12 months figures showed 41% overall compliance, the worst parameters being FOG 29%.

WRF have been subject of a Trader Action Plan (TAP) to install a grease trap and suitable balancing tank screening system. The timescale for this was now March 2010.

DR stated that they had employed a consultant to scope the problem and deliver a solution by March 2010, but due to the overrun of his previous project he had been delayed.

AK stated that because this project had been delayed twice before there should be no slippage on time or enforcement action including formal samples would take place if the improvements were not made in the timescale.

Fish scales had been appearing in large quantities at the WWTP causing problems by blinding the screens and rotary lifts – photos shown of problem. AK said that sieve traps would be placed in the sewers adjacent to the outfalls of both salmon processors in Dingwall to find the source of the problem and it was likely that the clean up cost would be billed to any guilty parties.

DR thought that his current screening system was dealing with scales but he would check on its operation.

The next day (14 January 2010), Scottish Water wrote to Wester Ross Fisheries stating that they were "greatly concerned about the large quantities of fish scales appearing at the Dingwall Wastewater Treatment Plant". According to Scottish Water, the fish scales from the farmed salmon processing plant were "choking the inlet screens":



Attn David Robinson
Wester Ross Fisheries
Taigh na Braden
Dingwall Business Park
Dingwall
IV15 9XD

SCOTTISH WATER

31 Henderson Drive
Longman North
Longman Industrial Estate
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 801 8855
F: 01463 712846

W: www.scottishwater.co.uk

Dear Mr Robinson,

I refer to our meeting on 13th January 2010 at your premises and I am writing you to reiterate what was said. Scottish Water is greatly concerned about the large quantities of fish scales appearing at the Dingwall Wastewater Treatment Plant (WWTP). These are choking the inlet screens and blocking rotational screw pumps which have to be regularly dismantled to be cleaned. It is therefore vital that you check the screening system in your premises is working correctly and there is no route that fish scales and trimmings from your operation can get into the sewer network.

If the situation continues Scottish Water shall place sieve traps in the sewer discharges from the Salmon Processors in Dingwall to find the source of the scales and recharge the clean up costs incurred to any guilty parties.

Compliance of Consent conditions were currently at 41% overall and it was essential that the installation of a new balancing tank, grease removal system and sampling point should be completed within the timescale stated on the recent Trader Action Plan (March 2010). It was noted that any delay in timescale could result in formal sampling and legal enforcement action.

Wester Ross Fisheries claimed later that month (January 2010) that an upgrade to their effluent treatment would cost £84,000:

From: David Robinson [David@wrs.co.uk]
Sent: 25 January 2010 13:54
To: Alan Kellock
Subject: Effluent treatment

Hi Alan

On Friday I had a meeting with Ted Miles and Alan Ross regarding upgrading our effluent treatment, I was rather shocked to say the least that final costing is £84,000. Are you available anytime this week to attend a discussion with them to be sure that what is being proposed is what is required?

Thanks and regards

David Robinson
[Wester Ross Fisheries Ltd](#)

Taigh na Bradan
Dingwall Business Park
Dingwall IV15 9XD
Tel 01349 866222
Mob 07848448400

In January 2010, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996:



The Highland
Council
Comhairle na
Gàidhealtachd

Mr David Robinson
Manager
Wester Ross Fisheries Ltd
4 Strathview
Dingwall
IV15 9XD

Please ask for: *Clifford Smith*
Direct Dial: *01349 868489*
E-mail: *env.health@highland.gov.uk*
Your ref:
Our ref: *CS/Food*
Date: *11th January 2010*

Dear Sir

FOOD SAFETY ACT 1990
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006
PREMISES: Wester Ross Fisheries Ltd, 4 Strathview, Dingwall.

I refer to the inspection of the above premises on 5th January 2010, and to my discussions with you at that time.

The attached schedule details the outcome of the inspection. Any contraventions identified in the schedule require your immediate attention.

Should you disagree with the requirements of the enclosed Schedule you should make representation to Alistair Thomson, Head of Environmental Health and Trading Standards, within two weeks of receipt of this letter by writing to the address below or calling 01463 228700. The booklet "Food Law Inspections and Your Business" outlines your rights and is available from this office on request.

Publication of this report

Please note that the attached schedule will be placed on the Highland Council's public internet website (www.highland.gov.uk) within 14 days of the report being sent to you. This is in accordance with the Highland Council's Publication Scheme to ensure compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

Schedule

FOOD SAFETY ACT 1990 FOOD HYGIENE (SCOTLAND) REGULATIONS 2006

Premises Name:	Wester Ross Fisheries Ltd
Premises Address:	4 Strathview, Dingwall, IV15 9XD
Type of Premises:	Manufacturer & Packer
Date and time of Inspection:	5 th January 2010 at 12.15Hrs
Type of Inspection:	Food Safety and Food Standards
Areas Inspected:	Factory, Stores and Yard
Records/Documents examined:	HACCP, Labelling, Training and Pest Control.
Samples Procured:	Previous samples taken all satisfactory

Note

This schedule only covers the areas inspected as they were found at the time of the inspection. It should not be inferred that all hazards and defects within the premises have been identified. The responsibility for complying with legislation lies with the proprietor and your own checks should be carried out as a matter of routine.

This schedule contains **contraventions**. These are items that must be addressed to ensure your compliance with the above legislation. When considering work to deal with contraventions there may be other ways of achieving compliance with the law than those I have suggested. Alternatives may be used provided they are of equivalent effect. If you are in doubt as to the acceptability of alternatives please contact me.

Please note that Regulation 17 of the Food Hygiene (Scotland) Regulations 2006 makes it an offence to contravene or fail to comply with the requirements of EC Regulations 852/2004 and 853/2004. Regulation 4 of the General Food Regulations 2004 makes it an offence to contravene or fail to comply with the requirements of EC Regulations 178/2002.

Food Safety Contraventions

1. The brush strip at the Despatch Door of the factory was missing allowing pests access to the premises. The brush strip must be attached to the door to prevent access by pests. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d)*)

2. The cladding at the wash sinks is affected by corrosion. The wall cladding requires to be renewed or repaired and left in a sound, easy to clean condition. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(b)*)
3. The damaged light fitting above the gutting area cannot be adequately cleaned. You are required to repair or renew the light fitting to allow it to be thoroughly cleaned and where necessary disinfected. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1 (b)*)
4. The vacuum packs stored uncovered in the box store are open to contamination by condensation falling from the metal roof within the store. The pouches should be

Transport, Environmental and Community Services

The Highland Council, Ross House, High Street, Dingwall, IV15 9YN

Tel: 01348 868489 Fax: 01349 868594 e-mail: env.health@highland.gov.uk www.highland.gov.uk

kept covered and where necessary sealed to protect the pouches from contamination. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(a)*)

Read the correspondence with Highland Council in full [online here](#)

In March 2010, Scottish Water issued a "Notification of Non Compliance" for a breach of chemical oxygen demand:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 16/3/2010 and SW has issued attached letter.

3840mg/l Chemical Oxygen Demand - The Consented limit is 2000mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

And in March 2010, Scottish Water issued a "Notification of Significant Non Compliance" for total suspended solids:

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 19/03/2010 and SW has issued attached letter.

2150 mg/l Total suspended solids –The consented limit is 1000mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

In May 2010, SEPA recorded an 'Environmental Event Report' following a complaint from a member of the public regarding "oil in gully pot" and a routine inspection which found "pools of blood on the road".

SEPA Environmental Event Report

Elms Event Number ENV/0841207 Notification Number 1
Event Description Dingwall Busines Park, oil in gully pot on Strath View

Reported By

Surname Origin Public Complainant
Forename Affected Medium Land
Organisation Name Investigating Team North Highland
Address 1 Investigating Officer John MacDonald(notification)
Address 2
Address 3
Town
Post Code
Tel No
Fax No
Email Address

Receiving Officer Rob Ebbins

Time Received 10:00:00

Date Received 27-MAY-10

Time Responded 10:00:00

Date Responded 27-MAY-10

Within 24? Yes

Location Gully pot @ Strath View, Dingw

Located Notifiers Address? No

Date Event Occurred 27-MAY-10

Site Name RSA Site? No

Catchment

Mental H&S Assessment Low

Assessment Description

Impact Category 4 - Other

Type Oil / Fuel

Cause Unknown

Sector Sewage Treatment - Public

Source Surface Water Drain

Sepa Activity Controlled Activity Regulations (CAR)

Potential Hazard

Farm Name

Complainants Notified? Details

SEPA Environmental Event Report

Action Description visited the Dingwall SEPA Office to report that, the gullies in the vicinity of Edinburgh smoked salmon and Wester Ross Fisheries Ltd, one of the gully pots became full of engine oil. spoke initially to Emma Jones who asked Alison MacPherson for assistance. AM and EJ accompanied to the gully pot to verify that it is full of oil then walked to the River Peffery to check for pollution from the surface water outfall; no pollution was observed and the river appeared to be clean. Gully location confirmed as Strath View. The blocked drains were brought to HC's attention during a routine inspection that discovered pools of blood on the road surrounding the gully that now contains oil.

On return to the office, AM phoned Scottish Water to report the incident and also spoke to Alan Kellock of SW as he was involved in a similar incident some time ago. Scottish Water view is that as it is a gully pot, this is Highland Council remit to clean out.

1210 27/05/2010 arrived at the Dingwall SEPA office with photographs of the gully pots. AM informed SW that HC will take responsibility for cleaning the gully pot. Advised HC that no pollution of the River Peffery should occur during the clean up. HC would be responsible if any pollution did occur.

1400 28/05/2010 EJ observed SureClean suck the gully pot dry and attempt to jet the pipe. Highland Council and 2 x Scottish Water also in attendance. SureClean reported encountering a blockage approximately 4m in to the pipe and could therefore jet no further. Storm drain was checked by Scottish Water, this was dry and free of oil. Next step is to send a camera down the pipe to view the blockage if possible. May require the road to be dug up to fix the pipe. HC to arrange camera inspection.

Complaint closed as dealt with.

Read online via [SEPA Env Report 2010](#)

In August 2010, Scottish Water issued another "Notification of Significant Non-Compliance" for breaches of total suspended solids, chemical oxygen demand and biological oxygen demand:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 31/8/2010.

2540 mg/l Total suspended solids – The consented limit is 1000mg/l
4500 mg/l Chemical Oxygen Demand – The Consented limit is 2000 mg/l
2180 mg/l Biochemical Oxygen Demand – The Consented limit is 2000 mg/l

Please contact me if you require further information.

Regards

A handwritten signature in black ink, appearing to read "Alan Kellock".

Alan Kellock
Trade Effluent Adviser

In October 2010, Scottish Water issued another "Notification of Significant Non-Compliance" for breach of chemical oxygen demand:



**LP Failure Notification email
Template**

Date
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 12/10/2010

2630 mg/l Chemical Oxygen Demand – The Consented limit is 2000 mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

In October 2010, Scottish Water issued a warning letter for "Seriously Non-Compliant Effluent":

100310-4213A-TAP3
10/3/2010

Wester Ross Fisheries
Taigh na Braden
4 Strathview
Dingwall Business Park
Dingwall
IV26 2TN

SCOTTISH WATER

31 Henderson drive
Longman North
Inverness
IV1 1TR
CUSTOMER HELPLINE
T: 0845 601 8855
F: 01463 712846

W: www.scottishwater.co.uk

Dear Sirs,

Trade Effluent Consent Reference: 4213A
Warning Letter: Seriously Non-Compliant Effluent

I am formally writing to inform you of important compliance information relating to the above premises.

A recent compliance evaluation has determined that the following breaches of consent have occurred over the last three months. As a result of these breaches of consent it has been determined that your company is now in **serious non-compliance**.

Please note that it is a criminal offence to breach the limits specified in a Consent.

In September 2010, minutes of a between Scottish Water and Wester Ross Fisheries reported that "removal of fish oil is difficult and a consent review allowing a higher parameter may be a more realistic option":

100917 Wester Ross Fisheries

Present Alan Kellock Scottish Water
David Robinson Director Wester Ross Fisheries

Site Visit – New Treatment system and effluent sample point.

The new treatment system was being installed, balancing tank and new sample point had been fitted and telemetry system was being wired in. Photos of sample point / V notch weir taken. Should all be operational by end of September.

Compliance – the Rolling 12 months showed 85% compliance overall on all parameters. Fails in TSS 82% COD 82% & PSEM 65%. TSS and COD should hopefully be rectified by the new balancing and screening system being installed but removal of fish oil is difficult and a consent review allowing a higher parameter may be a more realistic option.



In 2008/9, compliance was 65% with only 17% compliance (i.e. 83% failure) for 'free grease & oil':

Trade Effluent Sample Summary Report
 Sample taken on or after 07/04/2008
 Consent ID = 4213A

Sampled Date	Received Date	Sample Number	Customer Reference	Sample Status	5-11 2500 2000 1000 100					pH Corrected ? ()	Free grease & oil (mg/l)	P: (n)
					Hydrogen ion (pH value)	Settled Biochemical Oxygen Demand (mgO2/l)	Settled Chemical Oxygen Demand (mgO2/l)	Suspended solids (mg/l)				
17/03/2009 11:00	17/03/2009	4351889		Authorised	6.8	3684	7480	1874		Not Required	253.3	
19/02/2009 11:00	19/02/2009	4315253		Authorised	8.3	452	1910	385		Yes	492.0	
20/01/2009 11:45	20/01/2009	4282474		Authorised	7.2	136	207	124		Not Required	70.0	
27/11/2008 13:00	29/11/2008	4226246		Authorised	6.6	298	702	241		Not Required	124.0	
28/10/2008 11:45	28/10/2008	4191197		Authorised	6.6	979	2052	485		Not Required	130.0	
30/09/2008 11:00	30/09/2008	4153554		Authorised	6.3	3108	5495	2344		Not Required	1060.0	
04/09/2008 12:30	04/09/2008	4118024		Authorised	6.4	788	1800	1023		Not Required	330.0	
05/08/2008 11:15	05/08/2008	4063373		Authorised	6.4	3193	5490	3128		Not Required	1007.5	
26/06/2008 13:40	26/06/2008	4047047		Authorised	6.4	224	514	290		Not Required	211.7	
05/06/2008 11:40	05/06/2008	4011703		Authorised	6.5	478	1125	509		Not Required	533.3	
15/05/2008 11:40	15/05/2008	3975634		Authorised	6.7	366	925	443		Not Required	236.7	
15/04/2008 10:10	15/04/2008	3942215		Authorised	6.9	31	92	37		Not Required	64.0	
					6.3	31	92	37			64.0	
					8.3	3,684	7,480	3,128			1,060.0	
					6.8	1,144	2,331	907			376.0	
					0.2	389	703	288			98.6	
					0.5	1,348	2,436	996			341.6	
					12	12	12	12			12	

FAILS

0 3 4 4 10
 100% 75% 66% 66% 17%

COMPLIANCE

$$\frac{21}{60} = 65\%$$

Read the report [online here](#)

In September 2009, Wester Ross Fisheries received a "Notification of a Significant Non-Compliance" for breaches of chemical oxygen demand and total suspended solids:



**LP Failure Notification email
Template**

Date: 09/03/2009
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 29/9/09 and SW has issued attached letter.

2875mg/l Chemical Oxygen Demand - The Consented limit is 2000mg/l
1439 mg/l Total suspended solids –The consented limit is 1000mg/l

Please note that this sample will be included in the determination of wholesale billing strengths (St & Ot) for 2010/2011.

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

And another "Significant Non-Compliance" for breaching total suspended solids by over two times the limit in January 2010:



**LP Failure Notification email
Template**

Date 09/03/2009
Issued:
Reference: TE/LET/33
Version: 1.0

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 26/01/2010 and SW has issued attached letter.

2355 mg/l Total suspended solids –The consented limit is 1000mg/l

Please note that this sample will be included in the determination of wholesale billing strengths (St & Ot) for 2010/2011.

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

In March 2009, Scottish Water sent a warning letter to Wester Ross Fisheries for a "Serious Parameter Failure":

090313-4213A-LET



RECORDED DELIVERY

Wester Ross Fisheries Limited
Tiagh Na Bradan
Dingwall Business Park
Dingwall
IV15 9XD

SCOTTISH WATER

31 Henderson Drive
Longman North
Longman Industrial Estate
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855
F: 01463 712846

W: www.scottishwater.co.uk

Dear Sirs,

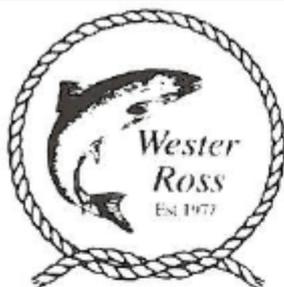
Trade Effluent Consent Reference: 4213A
Warning Letter: Serious Parameter Failure

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a serious parameter failure. (see attached analysis reports).

Please note that it is a criminal offence to breach the limits specified in Consent.

In March 2009, Wester Ross Fisheries said that it would cost £15,000 to £20,000 for a new system to reduce the amount of free oils and grease (FOG) and that that they would clean out the existing system:



Wester Ross Fisheries Ltd

Please respond to:

FARMS

Ardmain, Ullapool
IV26 2TN

T: 01854 61 21 21

F: 01854 61 28 12

E: ardmain@wrs.co.uk

PROCESSING

4 Strathview, Dingwall
IV15 9XD

T: 01349 866 222

F: 01349 865 965

E: processing@wrs.co.uk

SALES & ACCOUNTS

PO Box 6075, Naom
IV12 5WW

T: 01667 455 222

F: 01667 459 129

E: sales@wrs.co.uk

26th March 2009

Scottish Water
31, Henderson Drive
Longman Industrial Estate
Inverness
IV1 1TR

Dear Alan

I am writing in response to your letter indicating a parameter failure of our trade effluent.

We have been investigating ways of reducing the amount of free oils and grease (FOG) entering the effluent but as yet have not identified an affordable, reliable and cost effective system. We have had a quotation of £15-20,000 for a system similar to one installed locally; this cost includes the installation and frost protection required. As a small company in the present financial climate we will find it very difficult to finance the cost of this installation. I am however endeavouring to clean out our existing system in the hope that this may help to lower the amounts of FOG in our effluent levels, and this will be carried out as soon as a contractor can be found willing to carry out the work.

The next month (April 2009), Scottish Water reported that there were "FOG failures in 10/12 samples taken" (i.e. 83%):

-----Original Message-----

From: Alan Kellock [<mailto:Alan.Kellock@scottishwater.co.uk>]

Sent: 06 April 2009 10:21

To: David Robinson

Subject: Sample results

David,

As requested attached are the sample results for the previous rolling 12 months. The consented parameters are FOG 100mg/l COD 2000 mg/l BOD 2000mg/l Suspended Solids 1000 mg/l pH range 5-11

FOG failures in 10/12 samples taken.

I am planning being in Dingwall on Thursday 16th - are you available for a meeting if so let me know a suitable time

regards

Alan Kellock

Trade Effluent Quality Advisor

01463 228202

For all enquiries regarding new Consents contact TEQ@scottishwater.co.uk

Minutes of a meeting in April 2009, stated that 62% compliance was "unacceptable to Scottish Water". Wester Ross Fisheries was now looking to pump the effluent to the Edinburgh Smoked Salmon effluent plant around 100 metres away and was looking for a second hand "above ground grease traps":

SHOULD BE 09 AK

~~080416~~ Wester Ross Fisheries

Present

David Robinson - Wester Ross Fisheries

Alan Kellock - Scottish Water

AK asked regarding the progress of the installation of the grease trap and detailed that compliance was at 62% overall which was unacceptable to SW.

The response letter of 26/4/09 had stated that they had not yet identified an affordable grease trap and were planning cleaning out the effluent sump to see if that improved performance. Cited the economic downturn as a reason for not affording grease trap quoted at £20k

DR- no progress had been made on the grease trap or cleaning out the sump as yet and was still looking at options including pumping the effluent to the Edinburgh Smoked salmon Effluent plant approx 100m away.

AK – emphasised the urgency that was required to remedy the situation and stated that a letter would be sent out with a TAP attached which would have to be responded top and action taken or formal sampling and a report to the PF would follow.

DR understood the seriousness of the situation and would discuss it a the WRF Board meeting tomorrow 17/4/09.

AK told DR to look at the market for second hand above ground grease traps as there had been one at Scotia Nutritional in Fort William prior to them closing.

Serious non Compliance and TAP to be sent out 17/4/09

The subsequent warning letter in April 2009 from Scottish Water detailed "Seriously Non-Compliant Effluent":

17/4/2009
090417-4213A-LET



RECORDED DELIVERY

Wester Ross Fisheries Limited
4 Strathview
Dingwall business park
Dingwall
IV15 9XD

SCOTTISH WATER

31 Henderson Drive
Longman North
Longman Industrial Estate
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855
F: 01463 712846

W: www.scottishwater.co.uk

For The Attention of David Robinson

Dear Sir,

Trade Effluent Consent Reference: 4213A
Warning Letter: Seriously Non-Compliant Effluent

I am formally writing to inform you of important compliance information relating to the above premises.

A recent compliance evaluation has determined that the following breaches of consent have occurred over the last twelve months (see attached compliance summary). As a result of these breaches of consent it has been determined that your company is now in **serious non-compliance**.

These issues are of concern to SW because Free Oil and Grease discharged into the sewer system can cause chokes and operational problems at the wastewater Treatment Plant. Please note that it is a criminal offence to breach the limits specified in a Consent.

The letter detailed a 20% compliance (i.e. 80% failure) rate for 'free oil and grease' (FOG):

Discharge Point Code: 4213A
 Customer Name: Wester Ross Fisheries Ltd
 Sample date from: 01/04/2008
 Sample date to: 01/04/2009
 Compliance status for this period: Seriously Non-Compliant

Exceedance	2
Parameter fails	6
Serious parameter fails	11
Total number of failures	19
Percentage passed	62.00 %

Please note that full compliance is calculated over 12 months. If the time period indicated here is less than 12 months, the results may not be representative.

Determinand	Biochemical Oxygen	Chemical Oxygen	Free Oil and Grease	pH	PSEM	Suspended Solids
Consent limit date from	01/09/2004	01/03/2006	14/12/1998	01/03/2006		01/09/2004
Minimum limit:				5.00		
Maximum limit:	2,000.00	2,000.00	100.00	11.00		1,000.00
Unit of measure:	mg/l	mg/l	mg/l	pH		mg/l

Sample Number	Sample Date	Sample time	Results	Results	Results	Results	Results	Results
3942215	15/04/2008	10:10 AM	31	92	<64.0	6.9		37
4047047	26/06/2008	1:40 PM	224	514	211.7	6.4		290
4083373	05/08/2008	11:15 AM	3193	5490	1007.8	6.4		3128
4118024	04/09/2008	12:30 PM	788	1800	320.0	6.4		1023
4153554	30/09/2008	11:00 AM	3100	5438	1000.0	6.3		3844
4191197	28/10/2008	11:45 AM	979	2052	130.0	6.6		485
4226246	27/11/2008	12:00 PM	298	792	124.0	6.6		241
4282474	20/01/2009	11:45 AM	136	297	70	7.2		124
4315258	19/02/2009	11:00 AM	452	1910	493.0	8.3		385
4351889	17/03/2009	11:00 AM	3684	7480	283.3	6.8		1874
Failures	Exceedance			1				1
	Parameter fails		3		2			1
	Serious parameter fails			3	6			2
	Percentage passed		70 %	60 %	20 %	100 %	No consent	60 %

Read the letter in full [online here](#)

In April 2009, SEPA recorded an 'Environmental Event Report' following a complaint from a member of the public detailing "fish waste discharged into River Peffery". SEPA visited the site and found "evidence of fish waste in the river" with "scales and fish guts evident from the surface water drain downstream" and "evidence of sewage fungus growing within the river":

SEPA Environmental Event Report

Action Description Complaint received via SCC of fish wastes being discharged into the surface water drains from the Dingwall business Park at NH 536597.

AS and JK visited the site. Evidence of fish waste in the river. Scales and fish guts evident from the surface water drain downstream. Appeared to be some evidence of sewage fungus growing within the river. Odour of fish was noted.

Called Scottish Water to report the discharge as it is a scottish water surface drain. SW agreed to investigate the pipe network to trace the source. It was thought that the material originated from the fish processing factory which is present within the business park.

SW Service Request No. - 2599856
CDR/EPI/0004316/1

Complaint closed.

Read SEPA's report online via [SEPA Env Report 2009](#)

In September 2009, Scottish Water threatened to send a report to the Procurator Fiscal following continued non-compliance:

090914-4213A-LET

14 September 09



Wester Ross Fisheries Limited
Taigh Na Braden
Dingwall Business Park
Dingwall
Ross shire
IV26 2TN

Attn David Robinson

Dear Mr Robinson,

SCOTTISH WATER

31 Henderson drive
Longman North
Longman Industrial Estate
Inverness
IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855

F: 01463 712846

W: www.scottishwater.co.uk

Sewerage (Scotland) Act 1968

Action Plan to Address a Non-Compliant Trade Effluent Discharge

With reference to the Trader Action Plan submitted to Scottish Water (SW) on 17/04/2009, I give notice that the agreed completion date for the actions has now passed.

Despite completing your Trader Action Plan recent samples taken of the trade effluent discharging from your premises continue to be unsatisfactory and the discharge continues to be classed as non-compliant (see attached analysis reports).

Further actions are necessary to return your discharge to compliance, which must be carried out within the shortest timescale possible. You are required to complete a new Trader Action Plan detailing the steps to be taken to achieve this, including timescales, which must be submitted to Scottish Water within 15 working days of this letter. An example Trader Action Plan can be found on our website at www.scottishwater.co.uk. If you wish assistance completing the Trader Action Plan please contact me on 01463 228202

As a result of your continued non-compliance SW is now considering preparing a report on the failures to the Procurator Fiscal. Given this position SW intends taking formal samples in addition to the routine planned samples should a report be necessary.

Failure to respond within the timescale, or undertake the necessary improvements timeously, will be included in any report prepared for the Procurator Fiscal. Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

In January 2009, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996 by Wester Ross Fisheries:

Mr David Robinson
Wester Ross Fisheries
4 Strathview
Dingwall Business Park
Dingwall
IV15 9XD

Please ask for: *Clifford Smith*
Direct Dial: *01349 868489*
E-mail: *env.health@highland.gov.uk*
Your ref:
Our ref: *CS/Food*
Date: *16th January 2009*

Dear Sir

**FOOD SAFETY ACT 1990
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006
PREMISES: Wester Ross Fisheries, 4 Strathview, Dingwall**

I refer to the inspection of the above premises on 5th January 2009, and to my discussions with you at that time.

The attached schedule details the outcome of the inspection. Any contraventions identified in the schedule require your immediate attention.

Should you disagree with the requirements of the enclosed Schedule you should make representation to Alistair Thomson, Head of Environmental Health and Trading Standards, within two weeks of receipt of this letter by writing to the address below or calling 01463 228700. The booklet "Food Law Inspections and Your Business" outlines your rights and is available from this office on request.

Publication of this report

Please note that the attached schedule will be placed on the Highland Council's public internet website (www.highland.gov.uk) within 14 days of the report being sent to you. This is in accordance with the Highland Council's Publication Scheme to ensure compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

Food Hygiene Requirements

1. The brush strip at the Despatch Door of the factory was missing allowing pests access to the premises. The brush strip must be attached to the door to prevent access by pests. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d)*)

Transport, Environmental and Community Services
The Highland Council, Ross House, High Street, Dingwall, IV15 9YN
Tel: 01348 868489 Fax: 01349 868594 e-mail: env.health@highland.gov.uk www.highland.gov.uk

2. The cladding at the wash sinks is affected by corrosion. The wall cladding requires to be renewed or repaired and left in a sound, easy to clean condition. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(b)*)
 3. The open metal support bars at the Access door within the factory are in a corroded state. The corroded supports are sealed and thereafter repaired, redecorated to provide them with surfaces which are smooth and non-absorbent and easy to clean. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d)*)
-

In July 2008, Highland Council wrote to Wester Ross Fisheries reporting the following "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996 by Wester Ross Fisheries:

Food Hygiene Contraventions

5/1/07 ✓ A flaking apron was noted in the production area. This damaged apron should be discarded. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(a))

5/1/07 ✓ A build-up of food debris was noted on the outside surfaces and buttons of the vacuum packing machine. The affected surfaces should be washed thoroughly and disinfected. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(a))

I would recommend that this specific item is included in your cleaning schedule.

Transport, Environmental and Community Services

The Highland Council, Ross House, High Street, Dingwall, IV15 9QN
Tel: 01349 868613 Fax: 01349 868594 E-mail: env.health@highland.gov.uk

3. 5/1/07 ✓ The rusty bar above the external door in the production area requires to be stripped of any loose paint or rust and the affected areas should be resealed. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d))

4. 5/1/07 ✓ 'Ready to use' plastic boxes were being stored uncovered outside. You must ensure that these boxes are stored covered in a hygienic manner to avoid their contamination. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter I Paragraph 2(c))

5. 5/1/07 ✓ Some uncovered packaging materials were noted being stored outside the premises. All such materials must be stored covered and be protected from sources of contamination. (Regulation (EC) No 852/2004 Article 4(2) Annex II Chapter I Paragraph 2(c))

6. 5/1/07 ✓ It is my understanding that the use of the external walkin chill is to be replaced with a permanent internal chill. Should you decide against this course of action, the damaged floor of your current walkin chill will require to be repaired. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1 (b))

Read the correspondence with Highland Council in full [online here](#)

In 2008, Scottish Water sent a warning letter to Wester Ross Fisheries for "Non-Compliant Effluent":

Wester Ross Fisheries Limited
Taigh Na Bradan
Dingwall Business Park
Dingwall
IV15 9XD

SCOTTISH WATER

31 Henderson Drive
Longman North
Inverness IV1 1TR

CUSTOMER HELPLINE

T: 0845 601 8855
F: 01463 712846

W: www.scottishwater.co.uk

For attention Mr David Robinson

Dear Sirs,

**Trade Effluent Consent Reference 4213A
Warning Letter: Non-Compliant Effluent**

I am formally writing to inform you of important compliance information relating to the above premises.

A recent compliance evaluation has determined that the following breaches of consent have occurred over the last 12 months (see attached).

As a result of these breaches of consent it has been determined that your company is now in **non-compliance**.

These issues are of concern to SW because Fats Oils and Greases can cause chokes in the sewer network and pumping stations as well as blinding the screens at the local Wastewater Treatment Plant.

Please note that it is a criminal offence to breach the limits specified in a Consent.

Scottish Water recommended that Wester Ross Fisheries install a grease trap:

Scottish Water			
Sewerage (Scotland) Act 1968			
Action Plan to Address a Non-Compliant Trade Effluent Discharge			
Notice No: 080616 4213A			
Name: Wester Ross Fisheries			
Details of Non-Compliance Issue(s)	Steps required to resolve non-compliance	Proposed Completion Date	Action Owner
FOG Failures	Install Grease Trap	END OF AUGUST 08	PURCHASE GREASE TRAP & ARRANGE INSTALLATION

Read the warning letter (16 June 2008) [online here](#)

Wester Ross Fisheries replied later in 2008 that they "are encountering problems with our plan to install fat trap" and "will have to look at a much bigger trap":

From: David Robinson [david@wrs.co.uk]
Sent: 22 August 2008 11:26
To: Alan Kellock
Subject: Fat trap installation

Alan

We are encountering problems with our plan to install fat trap. It seems that we may not be able to install a simple version and will have to look at a much bigger trap involving considerable groundworks and possible re-location of our drumscreen. To compound the problem the company that installed our original system are not able to carry-out any work until next year. I am in the process of contacting a different company who have installed fat separation tanks and will keep you informed of progress.

regards

David

Wester Ross Fisheries Ltd
Taigh na Bradan
Dingwall Business Park
Dingwall, IV15 9XD

In 2008, Scottish Water referred to "ongoing odour issues" and "regularly breaching the consent parameter":

Wester Ross Fisheries 080610

Present Alan Kellock Scottish Water
David Robinson Wester Ross Fisheries

Details of the past 12 months compliance showed that the effluent has problems and was regularly breaching the 100mg/l consent parameter. With the previous blockages and ongoing odour issues in the business park it was seen as imperative that these failures were sorted out.

AK stated that an enforcement letter would be sent out detailing the problems and asking for a remedial timescale from WRF.

In 2007, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996:

Factory

- dr 2. The leaking knee operated tap serving the hand wash area in the factory requires to be repaired and thereafter maintained in a sound condition. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter I Paragraph 4*)

Environmental Health Ross, Skye & Lochaber

Transport, Environmental and Community Services, Ross House, High Street, Dingwall, IV15 9QN
Tel: 01349 868613 Fax: 01349 868594 E-mail: env.health@highland.gov.uk

External Despatch Area

- dr 3. The gully at the Despatch Area apron was blocked. You must remove any blockage and repair any defects to ensure waste water can drain away effectively. (*Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter I Para 1*)
- dr 4. The damaged concrete joints at the apron of the factory at the external despatch area are causing water to pond which may contaminate the fish. The damaged joints require to be repaired to prevent the ponding of water at the site.

Read the FOI reply from Highland Council in full [online here](#)

In 2006, Scottish Water reported "a large amount of fish fins/parts of tails" entering the Wastewater Treatment Plant in Dingwall:

From: "Alan Kellock" <Alan.Kellock@scottishwater.co.uk>
To: <wrsprocessing@wrs.co.uk>
Sent: Monday, January 16, 2006 3:44 PM
Subject: Screening

For the attention of David Robinson

David,
I have received reports from the Wastewater Treatment Plant at Dingwall that a large amount of fish fins / parts of tails are entering the plant. Can you check that your screening system is working correctly, and get back to me.

Regards

Alan

In 2005, minutes of a meeting between Scottish Water and Wester Ross Salmon reported "high fat recordings":

Wester Ross Salmon 051021

David Robinson WRS
A Kellock SW

Sample issues – High fat recordings FOG Average >200mg/l up to max 953mg/l DW to look at installing some type of grease trap beyond drum screen.

Appendix 1: Scottish Water FOI reply (27 February 2014)

Scottish Water supplied 55 documents:

Analysis folder	01/01/1998	Analysis_2002-2004.xls - analysis 2002 to 2004. Change in format is due to a change in reporting systems in 2005 Analysis_2005_to_date.xls - analysis from 2005 onwards
Consents folder	02/01/1998	98-4213A-CONSENT.pdf - consent in force 1998 - 2004 04-4213A-CONSENT.pdf - consent in force 2004 - 2006 06-4213A-CONSENT.pdf - consent in force 2006 - 2011 11-4213A-CONSENT.pdf - consent in force 2011 to date
02_NONE	01/01/2002	For clarity, we no longer have copies of correspondence with the company prior to 21/10/2005 in electronic or hard copy, other than the consent document from 1998.
051021_4213A-MIN.pdf	21/10/2005	Minutes of a meeting with the company
060118-4213A-EMAIL.pdf	18/01/2006	Emails SW<=>WRS
060419-4213A-EMAIL.pdf	19/04/2006	Emails SW<=>WRS
07_NONE	01/01/2007	For clarity, there was no correspondence with the company in 2007
080610-4213A-AGENDA.pdf	10/06/2008	Agenda for meeting with WRF
080610-4213A-MIN.pdf	10/06/2008	Minutes of meeting with WRF
080616-4213A-LET.pdf	16/06/2008	Letter to WRF re compliance with Trader Action plan signed by Co and returned to SW
080822-4213A-EMAIL.pdf	22/08/2008	Email from WRF re fat trap
090313-4213A-LET.pdf	13/03/2009	Letter to WRF re failures
090326-4213A-LET.pdf	26/03/2009	Letter from WRF in response to letter of 13/03/09
090407-4213A-EMAIL.pdf	07/04/2009	Emails SW<=>WRF
090407-4213A-EMAIL_ATTACHMENT.pdf	07/04/2009	TE Analysis 15/04/08 - 17/03/09
090416-4213A-MIN.pdf	16/04/2009	Minutes of meeting
090417-4213A-LET.pdf	17/04/2009	TAP issued to WRF 17/04/09. Includes analysis
090430_4213A-TAP.pdf	30/04/2009	Completed TAP
090508-4213A-LET_WRS.pdf	08/05/2009	Letter to WRF re TAP
090914-4213A-LET.pdf	14/09/2009	Letter to WRF re TAP issued 17/04/09. Issue new TAP
090914-4213A-MIN.pdf	14/09/2009	Minutes of meeting
090929-4213A-LP Failure Notification.pdf	29/09/2009	Notification to LP of breach of consent.
091120-4213A-EMAIL.pdf	20/11/2009	Email WRF > SW
091203-4213A-LET.pdf	03/12/2009	Letter to WRF re unsuccessful TAP closure
091214-4213A-TAP.pdf	14/12/2009	Completed TAP
100113-4213-MIN.pdf	13/01/2010	Minutes of a meeting with the company
100114-4213-MIN.pdf	14/01/2010	Letter to WRF re fish scales
100125-4213-LET.pdf	25/01/2010	Emails WRF>SW
100212_4213A-LP Failure Notification.pdf	12/02/2010	Notification to LP of breach of consent
100223-4213-EMAIL.pdf	23/02/2010	Email from WRF re treatment
100304-4213A-LET.pdf	04/03/2010	Letter SW>WRF re treatment. Third TAP included
100310-4213A-TAP3.pdf	10/03/2010	UNDATED LETTER. TAP relates to WRF - 04/03/10
100319-4213A-LET.pdf	19/03/2010	Notification to LP of breach of consent
100319-4213A-LET_2.pdf	19/03/2010	Notification to LP of breach of consent
100322-4213-EMAIL.pdf	22/03/2010	Emails SW<=>WRF
100408-4213-EMAIL.pdf	08/04/2010	Email from WRF confirming intend to place order with quotation attached. Note quotation comes first
100422-4213-EMAIL.pdf	22/04/2010	Email from WRF confirming order for treatment inc invoice
100701-4213-EMAIL.pdf	01/07/2010	Emails SW<=>WRF
100831-4213A-LET.pdf	31/08/2010	Fail notification
100917-4213-MIN.pdf	17/09/2010	Minutes of a meeting with the company
101012-4213-LET.pdf	12/10/2010	Fail notification
101021-4213A-LET.pdf	12/10/2010	Notification to LP of breach of consent
110317-4213-MIN.pdf	17/03/2011	Minutes of a meeting with the company. Nov 11 should be Nov 10
110405-4213-LET.pdf	05/04/2011	Fail notification
110503-4213A-LET.pdf	03/05/2011	Notification to trader of breach of consent
110503-4213A-LET_2.pdf	03/05/2011	Notification to trader of breach of consent
110603-4213-EMAIL.pdf	03/06/2011	Emails SW<=>WRF RE DRAFT CONSENT
111108-4213A-LET.pdf	08/11/2011	Notification to trader of breach of consent
111207-4213A-LET.pdf	01/12/2011	Notification to trader of breach of consent
111216-4213A-LET.pdf	01/12/2011	Notification to trader of breach of consent
120502-4213A-LET.pdf	02/05/2012	Letter SW > WRF
120509-4213A-LET.pdf	09/05/2012	Letter SW > WRF
120531-4213A-MIN.pdf	31/05/2012	Minutes of meeting
120803-4213A-LET.pdf	03/08/2012	Letter SW > WRF
131001-4213-EMAIL.pdf	01/10/2013	Emails SW<=>WRF

Via six emails:

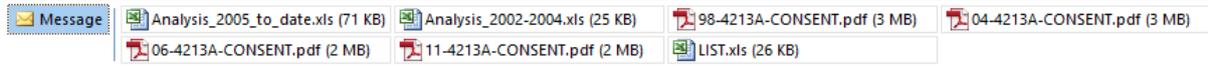
Request for Information - E-mail 1 of 6

Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:39.

Sent: Thu 27/02/2014 08:54

To: 'Don Staniford'



Analysis & Consent

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Scottish Water
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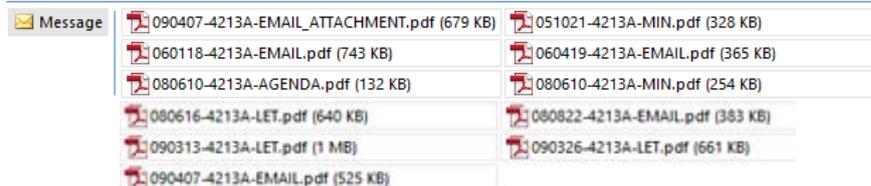
Request for Information - E-mail 2 of 6

Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:39.

Sent: Thu 27/02/2014 09:01

To: 'Don Staniford'



Dear Mr Staniford,

The List.xls attachment in my last e-mail is the file that details what is in the other attachments that are about to be sent.

Many thanks

Richard

Request for Information - E-mail 3 of 6

Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:39.

Sent: Thu 27/02/2014 09:03

To: 'Don Staniford'



Request for Information - E-mail 4 of 6

Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:40.

Sent: Thu 27/02/2014 09:06
To: 'Don Staniford'

Message	100322-4213A-EMAIL.pdf (574 KB)	100113-4213A-MIN.pdf (491 KB)
	100114-4213A-LET.pdf (663 KB)	100125-4213A-EMAIL.pdf (291 KB)
	100212-4213A-LP Failure Notification.pdf (51 KB)	100223-4213A-EMAIL.pdf (428 KB)
	100304-4213A-LET.pdf (18 KB)	100310-4213A-TAP3.pdf (853 KB)
	100319-4213A-LET.pdf (49 KB)	100319-4213A-LET_2.pdf (50 KB)

Request for Information - E-mail 5 of 6

Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:40.

Sent: Thu 27/02/2014 09:08
To: 'Don Staniford'

Message	110503-4213A-LET.pdf (51 KB)	100408-4213A-EMAIL.pdf (2 MB)	100422-4213A-EMAIL.pdf (462 KB)
	100701-4213A-EMAIL.pdf (487 KB)	100831-4213A-LET.pdf (315 KB)	100917-4213A-MIN.pdf (663 KB)
	101012-4213A-LET.pdf (259 KB)	101021-4213A-LET.pdf (49 KB)	110317-4213A-MIN.pdf (336 KB)
	110405-4213A-LET.pdf (261 KB)		

Request for Information - E-mail 6 of 6

Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:40.

Sent: Thu 27/02/2014 09:10
To: 'Don Staniford'

Message	131001-4213A-EMAIL.pdf (115 KB)	110503-4213A-LET_2.pdf (51 KB)	110603-4213A-EMAIL.pdf (491 KB)
	111108-4213A-LET.pdf (51 KB)	111207-4213A-LET.pdf (51 KB)	111216-4213A-LET.pdf (51 KB)
	120502-4213A-LET.pdf (21 KB)	120509-4213A-LET.pdf (22 KB)	120531-4213A-MIN.pdf (123 KB)
	120803-4213A-LET.pdf (21 KB)		

From: Richard Duncan [mailto:Richard.Duncan@SCOTTISHWATER.CO.UK] **On Behalf Of** FOI

Sent: 13 February 2014 13:55

To: 'Don Staniford'

Subject: RE: FOI on Wester Ross Fisheries processing plant in Dingwall - Our Reference: 4765766

Dear Mr Staniford,

Thank you for your request for information. I have been asked to provide some information to you and would be grateful if you could respond.

This company has had a consent to discharge effluent to sewer since at least 1998 when it was consented by NoSWA.

The consent and subsequent amendments to it would contain limits for volume, flow and normal sanitary determinands such as pH, suspended solids, biochemical and chemical

oxygen demand and fats/oils, but we would never have restricted or monitored for the discharge of sea lice or their eggs. All analytical information would relate the parameters contained in the consent.

Scottish Water would not monitor environmental health issues as these are the responsibility of the local council's Environmental Health department.

Inspection reports would relate to the sample point - assessing it from a safety point of view.

Any pollution incident reports would relate to breaches of the limits contained in the consent.

Scottish Water doesn't monitor for sea lice or infectious diseases in an effluent monitoring programme.

I would be grateful if you could advise if you still require all the information requested in view of the above and if so, I will arrange for the information to be collated and sent to you.

Yours sincerely,

Richard Duncan
FOI Analyst
Customer Experience Reporting

Telephone: 07443 876 049

E-mail: FOI@scottishwater.co.uk

Web: www.scottishwater.co.uk

Scottish Water
Always Serving Scotland

From: Richard Duncan [<mailto:Richard.Duncan@SCOTTISHWATER.CO.UK>] **On Behalf Of** FOI

Sent: 12 February 2014 10:23

To: Don Staniford

Subject: RE: FOI on Wester Ross Fisheries processing plant in Dingwall - Our Reference: 4765766

Dear Mr Staniford,

Thank you for your request for information.

I will provide you with a response by 12 March at the very latest but if I get all the information before this time, I will respond quicker.

Yours sincerely,

Richard Duncan
FOI Analyst
Customer Experience Reporting

E-mail: FOI@scottishwater.co.uk
Telephone: 07443 876 049

Scottish Water
Always Serving Scotland

From: Don Staniford [<mailto:director@protectwildscotland.org>]
Sent: 12 February 2014 09:19
To: FOI
Subject: FOI on Wester Ross Fisheries processing plant in Dingwall

Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002.

The following is an extract from a signed testimony recently divulged by a former employee at the Wester Ross facility:

OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:-

Firstly the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was where the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.

Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall.

Please include any letters and emails to and from Wester Ross Fisheries/Salmon.

Does Scottish Water monitor for sea lice or infectious diseases in any effluent monitoring programme?

Please note a [recent scientific paper](#):

UNIVERSITY OF VICTORIA, 19 DECEMBER 2013

FISH FARMS POSE BIOSECURITY RISK, SAYS NEW STUDY

Live fish pathogens are being transmitted from farmed salmon processing facilities into the marine waters of Canada's Pacific coast, a new study has confirmed.

Researchers at the University of Victoria say their peer-reviewed study titled "Fish processing facilities: new challenge to marine biosecurity in Canada," published recently in the *Journal of Aquatic Animal Health*, shows that fish farms pose a marine biosecurity risk for Canada and that better guidelines and monitoring of fish farms by the Canadian government are needed.

Salmon farms routinely experience outbreaks of sea lice, and juvenile wild salmon swimming past farms are often infected with sea lice. However, this is the first time that a processing facility for farmed salmon has been identified as a source of sea lice.

In this study, the authors recovered hundreds of live lice and eggs directly from the effluent of a facility that processes Atlantic salmon on Vancouver Island's east coast. The study site supports several wild salmon populations, including Canada's largest annual migration of juvenile sockeye salmon.

"Sea lice and other disease vectors transmitted from facilities processing farmed fish from across the province may pose a threat to wild salmon populations," says UVic marine ecologist Dr. John Volpe, a co-author of the paper. "Our study demonstrates that disease transmission is possible from farmed fish to wild fish through the tissue, blood and mucus released in untreated farmed salmon offal.

"If live sea lice eggs are pouring out of farmed salmon processing plants, it is likely that infectious bacteria and viruses are as well," says Volpe, adding that more research is needed to determine the extent of sea lice release and whether more virulent fish pathogens are present in fish farm effluent.

The other authors of the paper were UVic biologist Michael Price, Raincoast Research Society biologist Alexandra Morton, and J.G. Eriksson with Sonora Marine Services.

Copies of the paper are available at
<http://www.tandfonline.com/toc/uahh20/current#.UrMsSY3kDnc>

Media Contacts:

Dr. John Volpe (School of Environmental Studies) at 250-888-7711 (cell) or jpv@uvic.ca
Alexandra Morton (Raincoast Research Society) at 250-974-7086 or gorbuscha@gmail.com
Anne MacLaurin (Social Sciences Communications) at 250-217-4259 (cell) or
soscomm@uvic.ca

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<http://communications.uvic.ca/releases/tip.php?date=19122013#1534>

Please also note that carbon copy FOI requests were made to SEPA and Highland Council - SEPA's FOI reply yesterday (see attached) included:

Under SEPA's duty to advise and assist under the terms of The Environmental Information (Scotland) Regulations 2004 regulation 9, please note the Wester Ross Fisheries processing plant in Dingwall has a discharge to the local sewer, and as such Scottish Water is the body who regulate this discharge.

Hence this FOI request to Scottish Water.

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Don

Don Staniford

Director, Protect Wild Scotland: www.protectwildscotland.org

OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:-

Firstly the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was where the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.

Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall.

Please include any letters and emails to and from Wester Ross Fisheries/Salmon.

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Don

The Highland Council will endeavour to respond within the legislative time scale of 20 working days from date of receipt unless further clarification of your request is required.

Further information on response times can be found at:
www.itspublicknowledge.info/YourRights/HowlongwillIwait.asp

Yours Sincerely,

The Highland Council

From: Don Staniford [mailto:director@protectwildscotland.org]
Sent: 24 January 2014 20:34
To: 'Freedom of Information'
Subject: FOI on Wester Ross Fisheries processing plant in Dingwall

Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002.

The following is an extract from a signed testimony recently divulged by a former employee at the Wester Ross facility:

OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:-

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As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.

SEPA hold no information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports and testing in relation to the Wester Ross Fisheries processing plant in Dingwall. This information is excepted under Regulation 10(4)(a) of the Environmental Information Regulations 2004.

Under SEPA's duty to advise and assist under the terms of The Environmental Information (Scotland) Regulations 2004 regulation 9, please note the Wester Ross Fisheries processing plant in Dingwall has a discharge to the local sewer, and as such Scottish Water is the body who regulate this discharge.

As confirmed above SEPA does not hold this information on effluent monitoring, in accordance with Regulation 14(1)(b) of the Environmental Information (Scotland) Regulations 2004, we advise you to contact Scottish Water directly who may hold this information. The text of Regulation 14(1)(b) is reproduced below;

(1) Where a Scottish public authority has received a request to make environmental information available and does not hold that information but believes that another public authority holds the information requested then it shall:- (b) supply the applicant with the name and address of that other authority,

In accordance with the above, please note that the contact details for Scottish Water can be located in the link below.

<http://www.scottishwater.co.uk/about-us/freedom-of-information/freedom-of-information>

Read the FOI documents via:

[SEPA 2011 Odour issues meeting](#)

[SEPA Env Report 2010](#)

[SEPA Env Report 2009](#)

SEPA ACCESS TO INFORMATION ENQUIRY - F0184379

AccessToInformation [foi@sepa.org.uk]

You replied on 12/02/2014 09:21.

Sent: Tue 11/02/2014 15:41

To: director@protectwildscotland.org

Message F0184379 Response EIR.pdf (220 KB) ENV0832777_Redacted.pdf (5 KB) ENV0841207_Redacted.pdf (8 KB)
Minutes.pdf (23 KB)

Dear Mr Staniford

REQUEST FOR INFORMATION

Please see the attached response for your request for information.

Regards

Michael Hampton

SEPA Access to Information Team

Email: foi@sepa.org.uk

Tel: 01786 457700

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk
SEPA principal office: Erskine Court, Castle Business Park, Stirling, FK9 4TR. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: AccesstoInformation [mailto:foi@sepa.org.uk]
Sent: 27 January 2014 10:01
To: director@protectwildscotland.org
Subject: SEPA ACCESS TO INFORMATION ENQUIRY - F0184379

Dear Mr Staniford

REQUEST FOR INFORMATION - ACKNOWLEDGEMENT

I am writing to acknowledge receipt of your email, received by SEPA on 24/01/2014, in which you asked for the following information:

" Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002. Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall. Please include any letters and emails to and from Wester Ross Fisheries/Salmon. "

We must respond to your request within a 20 working day timeframe. This means that we will issue you with a response by 24/02/2014 at the latest.

Your unique reference number is F0184379. Please quote this in any future contact with us about your request.

This acknowledgement has been sent electronically to director@protectwildscotland.org. If you would like a hard copy signed letter please do not hesitate to contact us.

If you have any queries in the meantime please contact us.

Yours sincerely

Michael Hampton

SEPA Access to Information team

Email: foi@sepa.org.uk

Tel: 01786 457700

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk
SEPA principal office: Erskine Court, Castle Business Park, Stirling, FK9 4TR. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: Don Staniford [mailto:director@protectwildscotland.org]

Sent: 24 January 2014 20:34

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