

Email 1

From: <redacted> <<redacted>@gov.scot>
Sent: 15 November 2021 15:38
To: <redacted> <<redacted>@gov.scot>
Subject: times article

(Annex 1)

Good morning <redacted>,

Please find attached a copy of the letter I sent to <redacted> refuting the claims that appeared in the minutes of a Scottish Government meeting.

As you pointed out the Times has now printed an article claiming that seepage has been reported by officers which we all know is incorrect. They also claim that our derogation is to be withdrawn due to this report.

Is there any chance that the CNES / Scottish Government can speak to the author of the article pointing out the errors? We have tried to provide information to the newspaper to enable them to give a “ balanced” report but to no avail.

After your visit last week you will be aware of the huge amount of work that has been done on the site to get the plant to the completion stage. We are in constant dialogue with SEPA concerning preparing our PPC application and although we are working on gathering the information for the Animal Rendering By Products licence we have been told that we cannot move this forward until SEPA approve the PPC.

Everything is progressing well now and we could do without newspaper articles printing false information that has been supplied by the Scottish Government. I am presuming that we will be getting a letter outlining the conditions that are required to continue with the derogation (I am also presuming that these are as our Method Statement) and that it will continue until the Part A PPC / Animal Health approvals have been given.

Our small company has invested a huge amount of money into building a plant etc that will ensure the long term viability of the fish farming industry in the Western Isles and it is very worrying for the owners and staff when they read misleading articles in the newspapers.

I hope your self isolation does not curtail your lifestyle to any great degree and that you have a speedy recovery.

<redacted>
<redacted>

Email 2

From: <redacted>@btinternet.com <r<redacted>@btinternet.com>
Sent: 30 August 2021 12:45
To: <redacted> <<redacted>@gov.scot>
Subject: RE: Uist visit

Good afternoon <redacted>,

I have extended the invitation to three of the politicians who have an interest in our project + yourself and Murdoch MacLeod who will facilitate the politicians visit if it can be arranged.

If you cant make it then hopefully we can accommodate members of the T & F group. How many people are in it and are we allowed to know who they are as there has been no contact from anybody since you told me that it had been formed?.

Had a better meeting with SEPA last week which was more constructive.

Best regards

<redacted>

On 30 Aug 2021, 11:20 +0100, <redacted>@gov.scot, wrote:

Morning <redacted>

Thanks for the kind offer to facilitate the transport for a site visit but I will need to decline it. I do appreciate the offer of a site visit though and if possible would like to extend it to the wider task and finish group?

I would imagine most of the group could possibly still make the first week in October, not sure if that date was suggested due your friends availability. My travel would be through Scottish Government travel procedures, with due consideration for environmental impact and in line with the Civil Service Code.

Let me know if you want to host the task and finish group for a site visit?

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government

Tel. <redacted> | Mob: <redacted>

From: <redacted>@btinternet.com <<redacted>@btinternet.com>

Sent: 16 August 2021 11:02

To: <redacted> <<redacted>@gov.scot>

Subject: Uist visit

(Annex 3 – additional letter sent to Murdoch Macleod)

Good morning <redacted>,

I hope all is well.

Attached is a draft note of the main discussion points and actions from the first meeting of the Task and Finish Group. Grateful if I could have your comments by 27 August. I will take no response as being content.

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

Email 4

From: <redacted> | G <<redacted>@cne-siar.gov.uk>

Sent: 27 August 2021 09:52

To: <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - 1st meeting 22 July 2021 - discussion and action points - draft for comment

Morning <redacted>

It seems accurate.

Only thing I would include from my perspective is to mention the problem with resources for continuous monitoring of the location.

Other than that, OK

I'm down in Uist next week and planning on having a look to see what's been happening .

Cheers

<redacted>

From: <<redacted>@gov.scot <<redacted>@gov.scot>

Sent: 05 August 2021 17:13

To: <redacted> | G <<redacted>@cne-siar.gov.uk>; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@sepa.org.uk>

Cc: <<redacted>@gov.scot

Subject: Whiteshore Cockles - Task and Finish Group - 1st meeting 22 July 2021 - discussion and action points - draft for comment

WARNING: THIS EMAIL CAME FROM OUTSIDE THE COMHAIRLE; PLEASE TREAT HYPERLINKS OR ATTACHMENTS WITH CAUTION. CONTACT THE IT HELPDESK IF IN ANY DOUBT.

Hello all

Attached is a draft note of the main discussion points and actions from the first meeting of the Task and Finish Group. Grateful if I could have your comments by 27 August. I will take no response as being content.

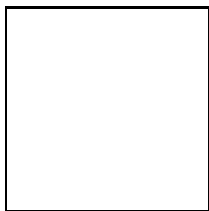
<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for
Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

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British Sign Language (BSL) users can contact us directly by using [contactSCOTLAND-BSL](#)



Email 5

From: <redacted>

Sent: 28 October 2021 16:03

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; '<redacted>' <<redacted>@cne-siar.gov.uk>; '<redacted>@cne-siar.gov.uk' <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted>, <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Hello

I have received advice from my Scottish Government legal colleagues on the fish waste burial conditions. Nothing major to change but they would like to see a bit more detail in the conditions. I have highlighted the conditions that need more detail and put in bold who I think is best placed to advise.

Burial conditions

1. No burial above ground (no banded pits)
2. Weekly list of morts detailing daily tonnage and origin sites to be emailed to eh@cne-siar.gov.uk
3. No pits left uncovered overnight – records and daily time stamped photographic evidence to be kept.

Further specification on the meaning “uncovered”. Greater specificity on the requirements will make it easier to establish a breach of the condition. We have this in the original Method Statement - Hole is covered in sand. If the pit has capacity left then a predator net is firmly secured over the site. Probably a question for **CnES**, is this what you would be looking for by having the pits covered?

4. Fish morts to be buried within 4 hours of arriving on site.

Recommend changing to – Animal by-product waste from aquaculture to be buried within 4 hours on arriving at site.

5. Skips to be cleaned immediately on emptying.

More detail on cleaning requirements, again to be clearer is condition has been breached. Method statement states - The empty bins are transported to the wash area where they are steam cleaned and disinfected before the lids are attached with cable ties. Are we content with this condition? Maybe **APHA** could state example to follow?

6. Only routine morts from Uist & Barra

Is routine sufficiently clear? Same with Uist and Barra. Would “from fish cultivated in waters [around/within x distance of] the coastline of Uist and Barra and any inland waters of those islands [if there are any fish on inland waters]” be more appropriate? Suggest **Marine Scotland** advise.

7. Any disposal of event morts have to be pre-notified to CNES & SG with quantities, origin location and disposal plan

Specification on an “event”. Could **Marine Scotland** provide advice on event mortality?

8. To end on 31/03/22 – to be debated
9. The site will be subject to a weekly unannounced weekly inspection.
10. Whiteshores will pay £200+vat for CNES monitoring

There may be scope for CNeS to charge but it should be removed from the conditions.

Burial derogation

We are wanting to move away from an open ended derogation. The new derogation is likely to remain in place until 31 March (at which point it would come to an end), although subject to cancellation by the Scottish Ministers if Whiteshore Cockles fails to adhere to the conditions.

On top of the conditions, an additional event that might lead to the cancellation of the derogation could be the refusal of the PPC Permit. Burial is not a long term solution, so failure to get a PPC Permit would mean the aquaculture industry seek alternative disposal routes. Can **SEPA** advise on appealing a refusal of a the PPC Permit? Could a revised application be made after the initial refusal?

In any case, the new derogation will not make a categorical statement that a new derogation will not be granted if the existing one comes to an end. That will enable us to have a full range of options available to it.

Grateful for comment by 19 November.

Thanks

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

Email 6

From: <redacted> (MARLAB) <<redacted>@gov.scot>

Sent: 02 November 2021 09:20

To: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Folks

I support the comments that <redacted> has made, particularly querying why we are differentiating between routine, and non-routine – the challenges for alternative

disposal routes are similar, or increased for non-routine. The challenge for the Uists / Barra is the current lack of disposal options and the difficulty of transporting the mortality off-island.

From the perspective of disease control, the challenge is to offer a biosecure disposal option at a reasonable distance from the source of the mortalities, whilst minimising nuisance.

With regard to what defines the farms in the Uists / Barra, I think of them as being the farms with their operating shore base in the Uists / Barra, regardless of where they are spatially in the sea.

Happy to discuss further if required.

<redacted>

<redacted>

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

Tel: <redacted>

Mobile: <redacted>

www.gov.scot/marinescotland

From: <redacted> <<redacted>@gov.scot>

Sent: 29 October 2021 09:00

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: FW: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

<redacted>,

Hopefully the comments below are helpful but have copied <redacted> (FHI) in for additional comment / correction if he has anything to add.

From our perspective mortality for disposal is mortality for disposal i.e. whatever the volume, cause or 'event' the end result is fish which needs disposed of in accordance with waste management regulations. Legislation and Scottish Government policy is in place regarding mortality issues which arise during production. For example, mortality above 'background levels' is reported to the Fish Health Inspectorate, considered, investigated if necessary and managed according to advice given. In the event that a notifiable disease was found, the enforcement of contingency measures and advice by the FHI would ensure waste was disposed of in accordance with disease management measures.

Therefore I'm not seeing the need for distinction in conditions between 'routine' mortality of otherwise, and whether the mortality is the result of an 'event' or not. I recommend the conditions focus on waste management irrespective of the reason or volume for the waste. Some information regarding mortality on sites and cause is reported in the public domain and I would caution against the conditions being used to generate information on mortality for any reason other than monitoring of waste management at the site. There's may also be a data protection issue to be considered with regards to the collection of data which is not required for waste management purposes.

This provides the context for my comments below.

I'm happy to chat about my comments if it would be helpful.

<redacted>

<redacted>

(Working days Monday, Wednesday, Thursday)

<redacted>

Marine Scotland – Aquaculture and Recreational Fisheries

Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

Tel: <redacted>

Mob: <redacted>

e: <redacted>@gov.scot

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

From: <redacted> <<redacted>@gov.scot>

Sent: 28 October 2021 16:03

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

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Burial conditions

1. No burial above ground (no banded pits)
2. Weekly list of morts detailing daily tonnage and origin sites to be emailed to eh@cne-siar.gov.uk. Am assuming this is to monitor compliance that the site is only receiving from the geographic area the derogation is intended to support and appropriate use of site capacity rather than to mortality per se, because the latter would not be appropriate. Is weekly the correct frequency?
3. No pits left uncovered overnight – records and daily time stamped photographic evidence to be kept.

Further specification on the meaning “uncovered”. Greater specificity on the requirements will make it easier to establish a breach of the condition. We have this in the original Method Statement - Hole is covered in sand. If the pit has capacity left then a predator net is firmly secured over the site. Probably a question for **CnES**, is this what you would be looking for by having the pits covered?

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Recommend changing to – Animal by-product waste from aquaculture to be buried within 4 hours on arriving at site.

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6. Only routine morts from Uist & Barra

Is routine sufficiently clear? Same with Uist and Barra. Would “from fish cultivated in waters [around/within x distance of] the coastline of Uist and Barra and any inland waters of those islands [if there are any fish on inland waters]” be more appropriate? Suggest **Marine Scotland** advise.

The Marine area is usually described by nautical miles from mean high spring tides. Alternatively it could be described by the planning authority jurisdiction which extends down to Mean Low Water Springs, with the exception of fish farming which extends out to 12 nautical miles. However if there is a need to distinguish between sites off Uist and Barra only then you may just have to specify

Also see my introductory comments regarding 'routine'. I'm unclear how 'routine' is being defined or why it matters. I would suggest its not relevant.

I suggest

'Only animal by-product waste from finfish farms operated by authorised Aquaculture Production Businesses and within the Western Isles Council planning authority area is received'

Or if the specific islands of Barra and (both?) Uist and not other islands need to be specified , you could say

'Only animal by-product waste from finish farms operated by authorised Aquaculture Production Businesses within coastal waters immediately adjacent to island X, island Y,.....'

7. Any disposal of event morts have to be pre-notified to CNES & SG with quantities, origin location and disposal plan

Specification on an "event". Could **Marine Scotland** provide advice on event mortality? I dont think it's necessary to refer to 'event' mortalities. I cant think why the reason for mortality is relevant. It can be argued that any mortality is the result of an event.

I'm not familiar with legislation requirements of waste disposal and notification obligations, so I'm not clear if pre-notification is required. so accept the following as suggestions for clarifying with a view to improving the condition.

- Who do these conditions apply to - whiteshore or the fish farms? I assume the conditions can only apply to whiteshore?
- What is the difference in what is to achieved by condition (2) and condition (7)?
- What is the fish farm or whiteside to do i.e. notify only or notify and wait for approval? Because it's the latter and if there's a delay to approval, what do you expect the fish farm to do with mortalities in the meantime?
- Why does a disposal plan need to forwarded everytime? Is it an operational requirement of the fish farm to have a disposal plan and is this not checked via other routes than a condition which applies to whiteshore? And equally if the conditions only apply to whiteshore than why does the disposal plan need to forwarded every time?

8. To end on 31/03/22 – to be debated

9. The site will be subject to a weekly unannounced weekly inspection.

10. Whiteshores will pay £200+vat for CNES monitoring

There may be scope for CNeS to charge but it should be removed from the conditions.

Burial derogation

We are wanting to move away from an open ended derogation. The new derogation is likely to remain in place until 31 March (at which point it would come to an end), although subject to cancellation by the Scottish Ministers if Whiteshore Cockles fails to adhere to the conditions.

On top of the conditions, an additional event that might lead to the cancellation of the derogation could be the refusal of the PPC Permit. Burial is not a long term solution, so failure to get a PPC Permit would mean the aquaculture industry seek alternative disposal routes. Can **SEPA** advise on appealing a refusal of a the PPC Permit? Could a revised application be made after the initial refusal?

In any case, the new derogation will not make a categorical statement that a new derogation will not be granted if the existing one comes to an end. That will enable us to have a full range of options available to it.

Grateful for comment by 19 November.

Thanks

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

From: <redacted>

Sent: 02 November 2021 16:37

To: <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>r@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Thanks <redacted> and <redacted>, both of your comments are helpful

Going back to <redacted> email, on the record keeping, I think we can make a work around on GDPR issues. WCL should be keeping commercial documents of all

consignments going to the site under ABP Regulations. I am sure a system can be adapted to rely this information to CNeS for official supervision purposes. I will let CNeS comment on frequency of providing this data.

On event mortality, it is important we distinguish mortality that is above background levels. From what you say FHI already make this distinction, so this is not new. We have concerns about the current burial procedures and site capacity to bury fish morts at WCL. This is the reason we are reviewing the burial derogation to make it easier for CEnS to official supervise the site. The geographical condition should reduce the current volume of morts going to the site. However, we should also be aware of mortality levels above background levels to ensure disposal is managed properly. You mentioned the FHI provide guidance when levels rise above background, does it refer to ABP regulations?

On your questions:

- Who do these conditions apply to - whiteshore or the fish farms? I assume the conditions can only apply to whiteshore? Only WCL
- What is the difference in what is to achieved by condition (2) and condition (7)? Condition 2 is general record keeping compliance. Condition 7 would be to ensure large scale disposal is managed properly i.e. not sitting uncovered for days.
- What is the fish farm or whiteside to do i.e. notify only or notify and wait for approval? Because it's the latter and if there's a delay to approval, what do you expect the fish farm to do with mortalities in the meantime? In theory, we would not reject any request from fish farms local to WCL. We are trying to prevent large quantities of/any fish morts from out with Barra and Uist being disposed of at WCL.
- Why does a disposal plan need to forwarded everytime? Is it an operational requirement of the fish farm to have a disposal plan and is this not checked via other routes than a condition which applies to whiteshore? And equally if the conditions only apply to whiteshore than why does the disposal plan need to forwarded every time?

A disposal plan is needed because burial of fish morts is not be allowed. We have temporarily allowed burial for WCL and these conditions apply to WCL only. We want to ensure that fish morts that are not included under the derogation are not getting buried at WCL. We want to maintain strict conditions for any fish farms that plan to use WCL as their method as disposal. So if a fish farm needs to use WCL for above background (event mortality) disposal then we need to have a process of recording that use.

Hope this is helpful.

<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>*

From: <redacted> (MARLAB) <<redacted>@gov.scot>
Sent: 02 November 2021 09:20
To: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>
Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>
Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

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<redacted>

<redacted>

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

Tel: <redacted>

Mobile: <redacted>

www.gov.scot/marinescotland

From: <redacted> <<redacted>@gov.scot>
Sent: 29 October 2021 09:00
To: <redacted> <<redacted>@gov.scot>
Cc: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <redacted>@gov.scot>; <redacted>

<<redacted>>[@gov.scot](mailto: <redacted>@gov.scot)

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<redacted>

(Working days Monday, Wednesday, Thursday)

<redacted>

Marine Scotland – Aquaculture and Recreational Fisheries

Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

Tel<redacted>

Mob: <redacted>

e: <redacted>[@gov.scot](mailto: <redacted>@gov.scot)

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

From: <redacted> <<redacted>@gov.scot>

Sent: 28 October 2021 16:03

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>>; <redacted> <<redacted>@gov.scot>

Subject: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Hello

I have received advice from my Scottish Government legal colleagues on the fish waste burial conditions. Nothing major to change but they would like to see a bit more detail in the conditions. I have highlighted the conditions that need more detail and put in bold who I think is best placed to advise.

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Further specification on the meaning “uncovered”. Greater specificity on the requirements will make it easier to establish a breach of the condition. We have this in the original Method Statement - Hole is covered in sand. If the pit has capacity left then a predator net is firmly secured over the site. Probably a question for **CnES**, is this what you would be looking for by having the pits covered?

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I suggest

‘Only animal by-product waste from finfish farms operated by authorised Aquaculture Production Businesses and within the Western Isles Council planning authority area is received’

Or if the specific islands of Barra and (both?) Uist and not other islands need to be specified , you could say

‘Only animal by-product waste from finish farms operated by authorised Aquaculture Production Businesses within coastal waters immediately adjacent to island X, island Y,.....’

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Specification on an “event”. Could **Marine Scotland** provide advice on event mortality? I dont think it’s necessary to refer to ‘event’ mortalities. I cant think why the reason for mortality is relevant. It can be argued that any mortality is the result of an event.

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There may be scope for CNeS to charge but it should be removed from the conditions.

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We are wanting to move away from an open ended derogation. The new derogation is likely to remain in place until 31 March (at which point it would come to an end), although subject to cancellation by the Scottish Ministers if Whiteshore Cockles fails to adhere to the conditions.

On top of the conditions, an additional event that might lead to the cancellation of the derogation could be the refusal of the PPC Permit. Burial is not a long term solution, so failure to get a PPC Permit would mean the aquaculture industry seek alternative disposal routes. Can **SEPA** advise on appealing a refusal of a the PPC Permit? Could a revised application be made after the initial refusal?

In any case, the new derogation will not make a categorical statement that a new derogation will not be granted if the existing one comes to an end. That will enable us to have a full range of options available to it.

Grateful for comment by 19 November.

Thanks

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate
for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

Email 7

From: <redacted> <<redacted>@apha.gov.uk>

Sent: 02 November 2021 17:28

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted> (MARLAB)
<<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-
siar.gov.uk>; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>@apha.gov.uk>;
<redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted>@sepa.org.uk;
<redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted>
<<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by
19 November

Hi <redacted>,

On condition 5 where query is addressed to APHA

See my comments below in [green](#).

Best regards.

<redacted>; DVM MRCVS

Veterinary Advisor - Field Delivery

APHA Scotland Field Services (Galashiels)

Animal and Plant Health Agency (APHA)

Telephone: <redacted> | Email: <redacted>@apha.gov.uk

Website: www.gov.uk/apha | Twitter: [@APHAgovuk](https://twitter.com/APHAgovuk) | Facebook: [APHAgov](https://www.facebook.com/APHAgov)

Address: APHA Perth Field Services, Strathearn House, Broxden Business Park,
Lamberkine Drive, Perth, PH1 1RX

From: <<redacted>@gov.scot <<redacted>@gov.scot>

Sent: 02 November 2021 16:37

To: <redacted>@gov.scot; <redacted>@gov.scot

Cc: <redacted>@gov.scot; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>r@cne-
siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk; <redacted>
<<redacted>@apha.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted>@sepa.org.uk;
<redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted>@gov.scot;
<redacted>@gov.scot; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by
19 November

Thanks <redacted> and <redacted>, both of your comments are helpful

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around on GDPR issues. WCL should be keeping commercial documents of all
consignments going to the site under ABP Regulations. I am sure a system can be

adapted to rely this information to CNeS for official supervision purposes. I will let CNeS comment on frequency of providing this data.

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On your questions:

- Who do these conditions apply to - whiteshore or the fish farms? I assume the conditions can only apply to whiteshore? Only WCL
- What is the difference in what is to achieved by condition (2) and condition (7)? Condition 2 is general record keeping compliance. Condition 7 would be to ensure large scale disposal is managed properly i.e. not sitting uncovered for days.
- What is the fish farm or whiteside to do i.e. notify only or notify and wait for approval? Because it's the latter and if there's a delay to approval, what do you expect the fish farm to do with mortalities in the meantime? In theory, we would not reject any request from fish farms local to WCL. We are trying to prevent large quantities of/any fish morts from out with Barra and Uist being disposed of at WCL.
- Why does a disposal plan need to forwarded everytime? Is it an operational requirement of the fish farm to have a disposal plan and is this not checked via other routes than a condition which applies to whiteshore? And equally if the conditions only apply to whiteshore than why does the disposal plan need to forwarded every time?

A disposal plan is needed because burial of fish morts is not be allowed. We have temporarily allowed burial for WCL and these conditions apply to WCL only. We want to ensure that fish morts that are not included under the derogation are not getting buried at WCL. We want to maintain strict conditions for any fish farms that plan to use WCL as their method as disposal. So if a fish farm needs to use WCL for above background (event mortality) disposal then we need to have a process of recording that use.

Hope this is helpful.

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

From: <redacted> (MARLAB) <<redacted>@gov.scot>

Sent: 02 November 2021 09:20

To: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Folks

I support the comments that <redacted> has made, particularly querying why we are differentiating between routine, and non-routine – the challenges for alternative disposal routes are similar, or increased for non-routine. The challenge for the Uists / Barra is the current lack of disposal options and the difficulty of transporting the mortality off-island.

From the perspective of disease control, the challenge is to offer a biosecure disposal option at a reasonable distance from the source of the mortalities, whilst minimising nuisance.

With regard to what defines the farms in the Uists / Barra, I think of them as being the farms with their operating shore base in the Uists / Barra, regardless of where they are spatially in the sea.

Happy to discuss further if required.

<redacted>

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

Tel: <redacted>

Mobile: <redacted>

www.gov.scot/marinescotland

From: <redacted> <<redacted>@gov.scot>

Sent: 29 October 2021 09:00

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: FW: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

<redacted>,

Hopefully the comments below are helpful but have copied <redacted> (FHI) in for additional comment / correction if he has anything to add.

From our perspective mortality for disposal is mortality for disposal i.e. whatever the volume, cause or 'event' the end result is fish which needs disposed of in accordance with waste management regulations. Legislation and Scottish Government policy is in place regarding mortality issues which arise during production. For example, mortality above 'background levels' is reported to the Fish Health Inspectorate, considered, investigated if necessary and managed according to advice given. In the event that a notifiable disease was found, the enforcement of contingency measures and advice by the FHI would ensure waste was disposed of in accordance with disease management measures.

Therefore I'm not seeing the need for distinction in conditions between 'routine' mortality of otherwise, and whether the mortality is the result of an 'event' or not. I recommend the conditions focus on waste management irrespective of the reason or volume for the waste. Some information regarding mortality on sites and cause is reported in the public domain and I would caution against the conditions being used to generate information on mortality for any reason other than monitoring of waste management at the site. There's may also be a data protection issue to be considered with regards to the collection of data which is not required for waste management purposes.

This provides the context for my comments below.

I'm happy to chat about my comments if it would be helpful.

<redacted>

<redacted>

(Working days Monday, Wednesday, Thursday)

<redacted>

Marine Scotland – Aquaculture and Recreational Fisheries

Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

Tel: <redacted>

Mob: <redacted>

e: <redacted>@gov.scot

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

From: <redacted> <<redacted>@gov.scot>

Sent: 28 October 2021 16:03

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

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[<redacted> (APHA)]

A C&D procedure stripped to bare essentials has only two steps (cleansing and disinfection) but the cleaning step can be as simple as just a sweep or long and complex (flushing, soaking with water at different temperatures, application of different detergents with or without scrubbing, etc...) depends on concrete conditions on the ground.

The cleaning step removes contamination by physically removing organic material and exposing inert surfaces as much as possible, the disinfection step intends to kill any lingering pathogens and must use a disinfectant approved by DEFRA under the General Diseases Order applied to the concentration required under said Order for an adequate amount of time.

In this method statement, considering we are just looking at skips, the steam clean is probably enough to achieve adequate cleaning, however, I would insist on the operator laying out a disinfection step where he clarifies: which DEFRA approved disinfectant will be used; what concentration will it be used and how long will it be allowed to be in contact with clean surfaces of skip.

I would suggest that if the legal advice is to include more detail with this condition, then the condition could be worded slightly different:

“5 - Skips to be cleaned and disinfected immediately on emptying in accordance with cleaning schedule agreed in advance with competent authority.”

6. Only routine morts from Uist & Barra

Is routine sufficiently clear? Same with Uist and Barra. Would “from fish cultivated in waters [around/within x distance of] the coastline of Uist and Barra and any inland waters of those islands [if there are any fish on inland waters]” be more appropriate? Suggest **Marine Scotland** advise.

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Grateful for comment by 19 November.

Thanks

<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel.<redacted> | Mob: <redacted>*

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Email 8

From: <redacted> <<redacted>@SEPA.org.uk>

Sent: 09 November 2021 13:59

To: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; k<redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

OFFICIAL

Just to update you on the Whiteshore Cockles PPC permit timeline: we have had discussions with the operator and they have advised they expect to be able to submit a permit application in early 2022 with the timing dependent on some further work they need to undertake to design the emissions control infrastructure. Therefore the timeline indicated below is reasonable.

Regards,

<redacted>

<redacted>

T: <redacted>

M: <redacted>

From: <redacted>

Sent: 04 November 2021 09:57

To: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot

Cc: <redacted>@gov.scot; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk<redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted> <<redacted>@sepa.org.uk>; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

<redacted>,

Regarding the PPC permit process: we are continuing dialogue with Whiteshore Cockles and we believe that they have the resources available to develop a proposal that will meet the relevant requirements. We have asked them for an indication of when they expect to be able to submit a permit application and I will let you know their response. Taking various factors into account, a likely timeline would be an application received by March 2022, and a permit issued by December 2022. They could then begin commissioning once they have the permit in place and this is likely to last at least 2 months. The site is likely start to waste processing in March 2023. This timescale could be advanced, but this is dependent on the quality of the permit application and more crucially, the emissions control measures being employed at the site.

It is our understanding that Whiteshore Cockles intend re-evaluate a number of the proposed emissions control measures to meet the relevant requirements in light of SEPA's feedback on the withdrawn application. Discussions with their new consultancy support indicate odour treatment system, as well as other areas, will need to be redesigned. We are awaiting Whiteshore Cockles to confirm its approach in writing. Subject to this confirmation, it is SEPA's view that they should be allowed some time to properly develop these measures, but this has to be balanced with the continued operation of burial activities.

The options are to extend the derogation to 31/3/23 or until the PPC permit is in place, whichever is the earlier, or they have to find another treatment route in the meantime.

Regards,

<redacted>

<redacted>

T: <redacted>

M: <redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 02 November 2021 16:37

To: <redacted>@gov.scot; <redacted>@gov.scot

Cc: <redacted>@gov.scot; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk;

<redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk;

<redacted>@apha.gov.uk; <redacted> <<redacted>@SEPA.org.uk>; <redacted>

<<redacted>@sepa.org.uk>; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot;

<redacted>@gov.scot

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

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<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>*

From: <redacted> (MARLAB) <<redacted>@gov.scot>

Sent: 02 November 2021 09:20

To: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

Folks

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Happy to discuss further if required.

<redacted>

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

Tel: <redacted>

Mobile: <redacted>

www.gov.scot/marinescotland

From: <redacted> <<redacted>@gov.scot>

Sent: 29 October 2021 09:00

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: FW: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

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I'm happy to chat about my comments if it would be helpful.

<redacted>

<redacted>

(Working days Monday, Wednesday, Thursday)

<redacted>

Marine Scotland – Aquaculture and Recreational Fisheries

Scottish Government | Area GB-North | Victoria Quay| Edinburgh| EH6 6QQ

Tel: <redacted>

Mob: <redacted>

e: <redacted>@gov.scot

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

From: <redacted> <<redacted>@gov.scot>

Sent: 28 October 2021 16:03

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>.donaldson@sepa.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

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I suggest

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'Only animal by-product waste from finfish farms operated by authorised Aquaculture Production Businesses within coastal waters immediately adjacent to island X, island Y,....'

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I'm not familiar with legislation requirements of waste disposal and notification obligations, so I'm not clear if pre-notification is required. So accept the following as suggestions for clarifying with a view to improving the condition.

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There may be scope for CNES to charge but it should be removed from the conditions.

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We are wanting to move away from an open ended derogation. The new derogation is likely to remain in place until 31 March (at which point it would come to an end), although subject to cancellation by the Scottish Ministers if Whiteshore Cockles fails to adhere to the conditions.

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In any case, the new derogation will not make a categorical statement that a new derogation will not be granted if the existing one comes to an end. That will enable us to have a full range of options available to it.

Grateful for comment by 19 November.

Thanks

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel<redacted> | Mob: <redacted>

From: <redacted> <<redacted>@SEPA.org.uk>

Sent: 04 November 2021 09:57

To: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

OFFICIAL

<redacted>,

Regarding the PPC permit process: we are continuing dialogue with Whiteshore Cockles and we believe that they have the resources available to develop a proposal that will meet the relevant

requirements. We have asked them for an indication of when they expect to be able to submit a permit application and I will let you know their response. Taking various factors into account, a likely timeline would be an application received by March 2022, and a permit issued by December 2022. They could then begin commissioning once they have the permit in place and this is likely to last at least 2 months. The site is likely start to waste processing in March 2023. This timescale could be advanced, but this is dependent on the quality of the permit application and more crucially, the emissions control measures being employed at the site.

It is our understanding that Whiteshore Cockles intend re-evaluate a number of the proposed emissions control measures to meet the relevant requirements in light of SEPA's feedback on the withdrawn application. Discussions with their new consultancy support indicate odour treatment system, as well as other areas, will need to be redesigned. We are awaiting Whiteshore Cockles to confirm its approach in writing. Subject to this confirmation, it is SEPA's view that they should be allowed some time to properly develop these measures, but this has to be balanced with the continued operation of burial activities.

The options are to extend the derogation to 31/3/23 or until the PPC permit is in place, whichever is the earlier, or they have to find another treatment route in the meantime.

Regards,

<redacted>

<redacted>

T: <redacted>

M: <redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 02 November 2021 16:37

To: <redacted>@gov.scot; <redacted>@gov.scot

Cc: <redacted>@gov.scot; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk;

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<<redacted>@sepa.org.uk>; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot;

<redacted>@gov.scot

Subject: RE: Whiteshore Cockles - Task and Finish Group - burial waste conditions - for comment by 19 November

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thanks <redacted> and <redacted>, both of your comments are helpful

Going back to <redacted> email, on the record keeping, I think we can make a work around on GDPR issues. WCL should be keeping commercial documents of all consignments going to the site under ABP Regulations. I am sure a system can be adapted to rely this information to CNeS for official supervision purposes. I will let CNeS comment on frequency of providing this data.

On event mortality, it is important we distinguish mortality that is above background levels. From what you say FHI already make this distinction, so this is not new. We have concerns about the current burial procedures and site capacity to bury fish morts at WCL. This is the reason we are reviewing the burial derogation to make it easier for CEnS to official supervise the site. The geographical condition should reduce the current volume of morts going to the site. However, we should also be aware of mortality levels above background levels to ensure disposal is managed properly. You mentioned the FHI provide guidance when levels rise above background, does it refer to ABP regulations?

On your questions:

- Who do these conditions apply to - whiteshore or the fish farms? I assume the conditions can only apply to whiteshore? Only WCL
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<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

From: <redacted> (MARLAB) <<redacted>@gov.scot>

Sent: 02 November 2021 09:20

To: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted><<redacted>@gov.scot>

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Tel: <redacted>

Mobile: <redacted>

www.gov.scot/marinescotland

From: <redacted> <<redacted>@gov.scot>

Sent: 29 October 2021 09:00

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> (MARLAB) <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@cne-siar.gov.uk; <redacted>@apha.gov.uk; <redacted>@apha.gov.uk; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

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<redacted>

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e: <redacted>@gov.scot

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Thanks

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob:<redacted>

OFFICIAL

<redacted>

From: <redacted> | <REDACTED> <k<redacted>@cne-siar.gov.uk>
Sent: 03 September 2021 15:10
To: <redacted> <[redacted>@gov.scot](mailto:<redacted>@gov.scot)>
Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Hi <redacted>

Hope you're fully refreshed, recharged and raring to go following your break!!
We're planning on meeting next week to discuss our options . Is that ok?
I was down in Uist next week and had a look at the site. Getting on well with installing the equipment and anticipate it being in place for October. The application to SEPA has still not been submitted because of a query regarding waste water disposal. They are also under financial pressure to have it in operation by March 2022. This seems quite optimistic though if the PPC application is still in limbo.
Regards

<redacted>

From: <[redacted>@gov.scot](mailto:<redacted>@gov.scot)> <[redacted>@gov.scot](mailto:<redacted>@gov.scot)>
Sent: 03 September 2021 14:55
To: <redacted> | <REDACTED> <[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)>
Cc: <redacted> <[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)>; <redacted> <[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)>; <[redacted>@gov.scot](mailto:<redacted>@gov.scot)>; <[redacted>@gov.scot](mailto:<redacted>@gov.scot)>
Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

WARNING: THIS EMAIL CAME FROM OUTSIDE THE COMHAIRLE; PLEASE TREAT HYPERLINKS OR ATTACHMENTS WITH CAUTION. CONTACT THE IT HELPDESK IF IN ANY DOUBT.

Hi <redacted>

Sorry to chase you up on this. Have you had time to consider fish waste burial conditions for Whiteshores?

<redacted>

From: <redacted>
Sent: 30 July 2021 15:55
To: <redacted> - Western Isles Council (<[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)> <[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)>
Cc: <redacted> - Western Isles Council (<[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)> <[redacted>r@cne-siar.gov.uk](mailto:<redacted>r@cne-siar.gov.uk)>; '<redacted>@cne-siar.gov.uk' <[redacted>@cne-siar.gov.uk](mailto:<redacted>@cne-siar.gov.uk)>; <redacted> <[redacted>@gov.scot](mailto:<redacted>@gov.scot)>; <redacted> <[redacted>@gov.scot](mailto:<redacted>@gov.scot)>
Subject: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Afternoon <redacted>

I know you were waiting to speak to <redacted> about the conditions for the continued burial of fish waste at Whiteshores when he got back from leave. Timing wise, we will have limited cover in the ABP policy team in the coming weeks, so if we could pick this up again at the end of August/start of September that would be ideal for us.

Hope you have a good weekend.

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>

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From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 03 September 2021 15:25

To: <redacted> | <REDACTED> <k<redacted>@cne-siar.gov.uk>

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

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Hi <redacted>

Thanks for the update and I am happy with that. I am off again next week but <redacted> is around if you need anything.

Have a good weekend.

<redacted>

From: <redacted> | G <<redacted>@cne-siar.gov.uk>

Sent: 03 September 2021 15:10

To: <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Hi <redacted>

Hope you're fully refreshed, recharged and raring to go following your break!!

We're planning on meeting next week to discuss our options . Is that ok?

I was down in Uist next week and had a look at the site. Getting on well with installing the equipment and anticipate it being in place for October. The application to SEPA has still not been submitted because of a query regarding waste water disposal. They are also under financial pressure to have it in operation by March 2022. This seems quite optimistic though if the PPC application is still in limbo.

Regards

<redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 03 September 2021 14:55

To: <redacted> | <REDACTED> <k<redacted>@cne-siar.gov.uk>

Cc: <redacted> <<redacted>r@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>;

<redacted>@gov.scot; <redacted>@gov.scot

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

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<redacted>

From: <redacted>

Sent: 30 July 2021 15:55

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>

Cc: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk' <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Afternoon <redacted>

I know you were waiting to speak to <redacted> about the conditions for the continued burial of fish waste at Whiteshores when he got back from leave. Timing wise, we will have limited cover in the ABP policy team in the coming weeks, so if we could pick this up again at the end of August/start of September that would be ideal for us.

Hope you have a good weekend.

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government

Tel. <redacted> | Mob: <redacted>

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From: <redacted> | <REDACTED> <<redacted>@cne-siar.gov.uk>

Sent: 06 September 2021 14:17

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@gov.scot

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Hi <redacted>

We've had a chat about Whiteshores and put together the following conditions which could be applied to the site:

1. No burial above ground (no bunded pits)
2. Weekly list of morts detailing daily tonnage and origin sites to be emailed to eh@cne-siar.gov.uk
3. No pits left uncovered overnight – records and daily time stamped photographic evidence to be kept.
4. Fish morts to be buried within 4 hours of arriving on site.
5. Skips to be cleaned immediately on emptying.
6. Only routine morts from Uist & Barra
7. Any disposal of event morts have to be pre-notified to CNES & SG with quantities, origin location and disposal plan
8. To end on 31/03/22 (?)
9. The site will be subject to a weekly unannounced weekly inspection.
10. Whiteshores will pay £200+vat for CNES monitoring?

Have a look at the proposed conditions and we'll discuss it when you get back. I've also attached a video of the large pit that was taken last week

Also <redacted> is forwarding you copy of the latest complaint we received from one of the local residents.

Regards

<redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 03 September 2021 15:25

To: <redacted> | <REDACTED> <<redacted>@cne-siar.gov.uk>

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

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Hi <redacted>

Thanks for the update and I am happy with that. I am off again next week but <redacted> is around if you need anything.

Have a good weekend.

<redacted>

From: <redacted> | <REDACTED> <<redacted>@cne-siar.gov.uk>

Sent: 03 September 2021 15:10

To: <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Hi <redacted>

Hope you're fully refreshed, recharged and raring to go following your break!!

We're planning on meeting next week to discuss our options . Is that ok?

I was down in Uist next week and had a look at the site. Getting on well with installing the equipment and anticipate it being in place for October. The application to SEPA has still not been submitted because of a query regarding waste water disposal. They are also under financial pressure to have it in operation by March 2022. This seems quite optimistic though if the PPC application is still in limbo.

Regards

<redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 03 September 2021 14:55

To: <redacted> | <REDACTED> <<redacted>@cne-siar.gov.uk>

Cc: <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@gov.scot; <redacted>@gov.scot

Subject: RE: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

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Hi <redacted>

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<redacted>

From: <redacted>

Sent: 30 July 2021 15:55

To: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>

Cc: <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; '<redacted>@cne-siar.gov.uk' <<redacted>@cne-siar.gov.uk>; <redacted><<redacted>@gov.scot>; <redacted><<redacted>@gov.scot>

Subject: Whiteshore Cockles - Task and Finish Group - fish waste burial conditions

Afternoon <redacted>

I know you were waiting to speak to <redacted> about the conditions for the

continued burial of fish waste at Whiteshores when he got back from leave. Timing wise, we will have limited cover in the ABP policy team in the coming weeks, so if we could pick this up again at the end of August/start of September that would be ideal for us.

Hope you have a good weekend.

<redacted>

<redacted>

Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government

Tel. <redacted> | Mob: <redacted>

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Email 9

From: <redacted> <<redacted>@gov.scot>

Sent: 17 September 2021 14:27

To: <redacted>@apha.gov.uk; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted>@sepa.org.uk; <redacted> <<redacted>@sepa.org.uk>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>@cne-siar.gov.uk>; <redacted> - Western Isles Council (<redacted>@cne-siar.gov.uk) <<redacted>r@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk

Subject: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

Afternoon all

<redacted> and colleagues at CnES have produced a list of condition for the official supervision role CnES would carry out for the burial of fish waste at WCL. I have discussed them internally within SG and we agreed that they seem reasonable and not too onerous to achieve/stick by.

I want to get the views of others within the Task and Finish Group and then run this past SG solicitors, with a view to putting a new burial derogation in place using these conditions.

Conditions which could be applied to the site:

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10. Whiteshores will pay £200+vat for CNES monitoring?

On point 8, the end date of end of March next year would support Whiteshores latest estimate for being operational. One thing we want to be clear is that is no PPC Permit is granted from SEPA, burial is no longer permissible. We are working towards an alternative solution and if that route fails, fish waste should be going to alternative legal disposal routes.

On point 10 and CnES charging for monitoring. I am assuming this will be for every visit (<redacted> can you confirm if this is correct?) and seems reasonable to recoup costs/time spent monitoring the site. We will need to clarify with legal if this is set in the conditions or taken up separately between CnES and WCL.

I would be grateful if you could respond to me by the end of the month. Nil replies will be treated as content with the conditions.

Hope you have a good weekend.

<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>*

Email 10

From: <redacted> <<redacted>@apha.gov.uk>

Sent: 22 September 2021 18:33

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@apha.gov.uk>; <redacted>@sepa.org.uk; <redacted>@sepa.org.uk; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk

Subject: Re: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

Hi <redacted>,

(<redacted> removed as is a local North Scotland issue)

Thanks for this.

1.Can you clarify the sentence below- I think it should be "once a PPC permit is granted...?"

One thing we want to be clear is that is no PPC Permit is granted from SEPA, burial is no longer permissible.

2. Could you provide an update on where we are with regulation of fish ensiling as this is related in terms of fish disposal options for industry.

3. Point 7 disposal of event morts- It would be good for APHA to also be notified of these- we are in discussion with FHI on this matter as well. Such events are sometimes reported to us as a welfare concern by external parties so early notification would assist in our assessment.

Many thanks,

<redacted>

Sent from my iPhone

On 17 Sep 2021, at 14:27, "<redacted>@gov.scot" <<redacted>@gov.scot> wrote:

Afternoon all

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Hope you have a good weekend.

<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel.<redacted> | Mob: <redacted>*

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Email 11

From: <redacted> <<redacted>@SEPA.org.uk>

Sent: 23 September 2021 09:10

To: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>r@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>@SEPA.org.uk>

Subject: RE: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

OFFICIAL – BUSINESS

Re fish ensiling, from a SEPA perspective we won't require an environmental authorisation for < 10m³ capacity sited on fish farm shore bases or on cage rafts/barges. However, where there is evidence that the activity at a particular site is consistently giving rise to offensive odours outside the site where we will consider the need for a PPC Permit. Larger scale ensiling plants >10m³ capacity and those maintained at processing plants will always require to be authorised under the Pollution Prevention and Control Regulations.

Hope this helps,

<redacted>

T: <redacted>

M: <redacted>

OFFICIAL – BUSINESS

From: <redacted> <<redacted>@apha.gov.uk>

Sent: 22 September 2021 18:33

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@SEPA.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted>@gov.scot; <redacted>@gov.scot; k<redacted>@cne-siar.gov.uk; <redacted> <<redacted>r@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk

Subject: Re: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

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(<redacted> removed as is a local North Scotland issue)

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<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>*

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Email 12

From: <redacted> <<redacted>@cne-siar.gov.uk>

Sent: 23 September 2021 09:37

To: <redacted> <<redacted>@SEPA.org.uk>; <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> | <REDACTED> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <redacted> <<redacted>@SEPA.org.uk>

Subject: RE: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

Morning

RE point 10.

The figure of £200 + vat was going to be per month but following further internal discussion we are anticipating weekly inspections so would increase to £350 + Vat per calendar month.

<redacted>

--

<redacted>

<redacted> (<redacted>) | Manaidsear Seirbheisean Luchd-Cleachdaidh agus Arainneachd (Consumer and Environmental Services Manager)

Roinn nan Coimhearsnachdan | Comhairle nan Eilean Siar | Rathad Shanndabhaig | Steornabhagh | Eilean Leodhais | HS1 2BW

Communities Department | [Comhairle nan Eilean Siar](#) | Sandwick Road | Stornoway | Isle of Lewis | HS1 2BW

<redacted>@cne-siar.gov.uk | <redacted> | Ext <redacted> | www.cne-siar.gov.uk

Links to further service information:

[COVID](#)

[Trading Standards](#)

[Food Safety](#)

[Health and Safety at Work](#)

[Licensing](#)

[Animal Health & Welfare](#)

Consumer & Environmental Services welcomes your feedback. Please help us improve our service by taking our short customer survey at www.surveymonkey.com/s/cnes-ces-c

Ag Obair Comhla airson na h-Eileanan Siar **COMHAIRLE NAN EILEAN SIAR** Working Together for the Western Isles



From: <redacted> <<redacted>@SEPA.org.uk>

Sent: 23 September 2021 09:10

To: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted>@gov.scot; <redacted>@gov.scot; <redacted> | <REDACTED> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted> <<redacted>@SEPA.org.uk>

Subject: RE: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

Some people who received this message don't often get email from fiona.donaldson@sepa.org.uk. [Learn why this is important](#)

WARNING: THIS EMAIL CAME FROM OUTSIDE THE COMHAIRLE; PLEASE TREAT HYPERLINKS OR ATTACHMENTS WITH CAUTION. CONTACT THE IT HELPDESK IF IN ANY DOUBT.

OFFICIAL – BUSINESS

Re fish ensiling, from a SEPA perspective we won't require an environmental authorisation for < 10m³ capacity sited on fish farm shore bases or on cage rafts/barges. However, where there is evidence that the activity at a particular site is consistently giving rise to offensive odours outside the site where we will consider the need for a PPC Permit. Larger scale ensiling plants >10m³ capacity and those maintained at processing plants will always require to be authorised under the Pollution Prevention and Control Regulations.

Hope this helps,

<redacted>

T: <redacted>

M: <redacted>

OFFICIAL – BUSINESS

From: <redacted> <<redacted>@apha.gov.uk>

Sent: 22 September 2021 18:33

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@apha.gov.uk>; <redacted> <<redacted>@SEPA.org.uk>; <redacted> <<redacted>@sepa.org.uk>; <redacted> <<redacted>@gov.scot>; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@cne-siar.gov.uk; <redacted> <<redacted>r@cne-siar.gov.uk>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@cne-siar.gov.uk>; <redacted>@cne-siar.gov.uk

Subject: Re: Whiteshore Cockles Ltd - Task and Finish Group - fish waste burial conditions

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

(<redacted> removed as is a local North Scotland issue)

Thanks for this.

1.Can you clarify the sentence below- I think it should be "once a PPC permit is granted...?"

One thing we want to be clear is that is no PPC Permit is granted from SEPA, burial is no longer permissible.

2. Could you provide an update on where we are with regulation of fish ensiling as this is related in terms of fish disposal options for industry.

3. Point 7 disposal of event morts- It would be good for APHA to also be notified of these- we are in discussion with FHI on this matter as well. Such events are sometimes reported to us as a welfare concern by external parties so early notification would assist in our assessment.

Many thanks,

<redacted>

Sent from my iPhone

On 17 Sep 2021, at 14:27, "<redacted>@gov.scot" <<redacted>@gov.scot> wrote:

Afternoon all

<redacted> and colleagues at CnES have produced a list of condition for the official supervision role CnES would carry out for the burial of fish waste at WCL. I have discussed them internally within SG and we agreed that they seem reasonable and not too onerous to achieve/stick by.

I want to get the views of others within the Task and Finish Group and then run this past SG solicitors, with a view to putting a new burial derogation in place using these conditions.

Conditions which could be applied to the site:

1. No burial above ground (no bunded pits)
2. Weekly list of morts detailing daily tonnage and origin sites to be emailed to eh@cne-siar.gov.uk
3. No pits left uncovered overnight – records and daily time stamped photographic evidence to be kept.
4. Fish morts to be buried within 4 hours of arriving on site.
5. Skips to be cleaned immediately on emptying.
6. Only routine morts from Uist & Barra
7. Any disposal of event morts have to be pre-notified to CNES & SG with quantities, origin location and disposal plan
8. To end on 31/03/22 (?)
9. The site will be subject to a weekly unannounced weekly inspection.
10. Whiteshores will pay £200+vat for CNES monitoring?

On point 8, the end date of end of March next year would support Whiteshores latest estimate for being operational. One thing we want to be clear is that is no PPC Permit is granted from SEPA, burial is no longer permissible. We are working towards an alternative solution and if that route fails, fish waste should be going to alternative legal disposal routes.

On point 10 and CnES charging for monitoring. I am assuming this will be for every visit (<redacted> can you confirm if this is correct?) and seems reasonable to recoup costs/time spent monitoring the site. We will need to clarify with legal if this is set in the conditions or taken up separately between CnES and WCL.

I would be grateful if you could respond to me by the end of the month. Nil replies will be treated as content with the conditions.

Hope you have a good weekend.

<redacted>

<redacted>

*Animal Health - Disease Prevention Team | Animal Health & Welfare Division | Directorate for Agriculture & Rural Economy | Scottish Government
Tel. <redacted> | Mob: <redacted>*

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Email 13

From: <redacted> <<redacted>@gov.scot>

Sent: 30 September 2021 14:19

To: <redacted>@hient.co.uk; <redacted>@hient.co.uk

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: Whiteshore Cockles Ltd (WCL)

Good afternoon <redacted> and <redacted>,

I have been passed your contact details from <redacted>, Head of Marine Grants Team to help clarify a query I have regarding Whiteshore Cockles Ltd (WCL), Whiteshores, Kyles, Pailble, Isle of North Uist, HS6 5DY (Companies House details - Company number SC379476 - 26 Lewis Street, Stornoway, Isle of Lewis, HS1 2JF).

The team I work with have been briefing Ministers, dealing with correspondence from Whiteshore WCL and handling FOI's about the business for several years now and we recently established a task and finish group with wide representation to push the long running WCL "fish dryer" project to completion. In recent correspondence from the Managing Director of WCL to Murdoch McLeod, Deputy Director Financial Services and Location Director for the Outer Hebrides in the Scottish Government, it is stated WCL received support from Highlands and Islands Enterprise (HIE). In the letter, WCL state they received grant funding to assist with the purchase of equipment.

We have asked WCL about funding for their project and been informed it is private funding, perhaps this is a new development? I would be very grateful if someone could provide me with further information about the grant funding that WCL are referring to.

Happy to discuss further if required.

Kind Regards

<redacted>

Policy Officer
Disease Prevention Team
Animal Health & Welfare Division
Directorate for Agriculture & Rural Economy
Scottish Government

Email 14

From: <redacted> <<redacted>@gov.scot>

Sent: 01 October 2021 13:02

To: <redacted> <<redacted>@hient.co.uk>

Cc: <redacted> <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>;

<redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles Ltd (WCL)

Good afternoon <redacted>,

Many thanks for your quick reply.

We would like to know the following:

- Did Whiteshores received a grant from HIE?
- If so what exactly was it for?

- What was the total amount of the grant issued?
- And finally what was the date that Whiteshores received the grant?

For background information:

- The Scottish Government banned the burial of fish waste in 2016. However, Whiteshore Cockles Ltd (WCL), in North Uist were granted a temporary derogation by SG to bury fish waste at their site until the fish dryer was operational. The derogation also allowed the company to begin construction on a permanent solution for fish mortalities in the Western Isles.
- Whiteshores claimed continued burial of fish waste at their site was necessary to fund the fish dryer.
- On engaging with Whiteshores, they said the fish waste dryer project is self-funded.
- Securing this funding was one of the reasons for the delay in building the fish waste dryer.
- Burial of fish waste cannot go on indefinitely.
- Scottish Ministers need to have a clear picture of what is happening with the fish waste dryer project.

I hope the above helps to answer your questions/queries but if you require any further information then please just let me know.

Kind Regards

<redacted>

Policy Officer
Disease Prevention Team
Animal Health & Welfare Division
Directorate for Agriculture & Rural Economy
Scottish Government

From: <redacted> <<redacted>@hient.co.uk>

Sent: 30 September 2021 20:12

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: FW: Whiteshore Cockles Ltd (WCL)

Good evening <redacted>

I will be happy to help you with this. If you could let me know what specific information you require I will be happy to respond appropriately. If it would be easier to discuss I am free between 1 and 2 tomorrow on either of the numbers below.

Regards

<redacted>

<redacted>
Interim Area Manager
Innse Gall

DD: <redacted> | **Mob:** <redacted>

From: <redacted> <<redacted>@hient.co.uk>
Sent: 30 September 2021 17:06
To: <redacted>@gov.scot
Cc: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot;
<redacted> - Econ <<redacted>@hient.co.uk>; <redacted> <<redacted>@hient.co.uk>
Subject: RE: Whiteshore Cockles Ltd (WCL)

Hello <redacted>,

My colleague <redacted>, interim area manager in the Outer Hebrides, will be able to respond to your enquiry regards grant funding to Whiteshore Cockles Ltd.

Kind regards
<redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>
Sent: 30 September 2021 14:19
To: <redacted> <<redacted>@hient.co.uk>; <redacted> - Econ <<redacted>@hient.co.uk>
Cc: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot
Subject: Whiteshore Cockles Ltd (WCL)

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Good afternoon <redacted> and <redacted>,

I have been passed your contact details from <redacted>, Head of Marine Grants Team to help clarify a query I have regarding Whiteshore Cockles Ltd (WCL), Whiteshores, Kyles, Pailble, Isle of North Uist, HS6 5DY (Companies House details - Company number SC379476 - 26 Lewis Street, Stornoway, Isle of Lewis, HS1 2JF).

The team I work with have been briefing Ministers, dealing with correspondence from Whiteshore WCL and handling FOI's about the business for several years now and we recently established a task and finish group with wide representation to push the long running WCL "fish dryer" project to completion. In recent correspondence from the Managing Director of WCL to Murdoch McLeod, Deputy Director Financial Services and Location Director for the Outer Hebrides in the Scottish Government, it is stated WCL received support from Highlands and Islands Enterprise (HIE). In the letter, WCL state they received grant funding to assist with the purchase of equipment.

We have asked WCL about funding for their project and been informed it is private funding, perhaps this is a new development? I would be very grateful if someone could provide me with further information about the grant funding that WCL are referring to.

Happy to discuss further if required.

Kind Regards

<redacted>

Policy Officer
Disease Prevention Team
Animal Health & Welfare Division
Directorate for Agriculture & Rural Economy
Scottish Government

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Email 15

From <redacted> <<redacted>@hient.co.uk>
Sent: 01 October 2021 13:50
To: <redacted> <<redacted>@gov.scot>
Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>
Subject: RE: Whiteshore Cockles Ltd (WCL)

Hi <redacted>

We have provided two grants to Whiteshore Cockles Ltd as detailed below:

Fish waste drying project – for the establishment of a facility to process salmon morts
November 2016

£404k

Eligible costs – plant & equipment, construction of yard and building to house the machinery

Fish waste processing expansion – expansion of site to include ensiling facilities holding morts under controlled temperature and pressure

Feb 2021

£200k

Eligible costs – construction, steel fabrication and installation

I hope that helps but please don't hesitate to get back in touch if you require anything else.

Kind regards

<redacted>

<redacted>

Interim Area Manager
Innse Gall

DD: <redacted> | **Mob:** <redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>
Sent: 01 October 2021 13:02
To: <redacted> <<redacted>@hient.co.uk>
Cc: <redacted>; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot
Subject: RE: Whiteshore Cockles Ltd (WCL)

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Good afternoon <redacted>,

Many thanks for your quick reply.

We would like to know the following:

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I hope the above helps to answer your questions/queries but if you require any further information then please just let me know.

Kind Regards

<redacted>

Policy Officer

Disease Prevention Team

Animal Health & Welfare Division

Directorate for Agriculture & Rural Economy

Scottish Government

From: <redacted> <<redacted>@hient.co.uk>

Sent: 30 September 2021 20:12

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

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<redacted>

<redacted>

<redacted>

Interim Area Manager
Innse Gall

DD: <redacted> | **Mob:** <redacted>

From: <redacted> <<redacted>@hient.co.uk>

Sent: 30 September 2021 17:06

To: <redacted>@gov.scot

Cc: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot;

<redacted> - Econ <<redacted>@hient.co.uk>; <redacted> <<redacted>@hient.co.uk>

Subject: RE: Whiteshore Cockles Ltd (WCL)

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Kind regards

<redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 30 September 2021 14:19

To: <redacted> <<redacted>@hient.co.uk>; <redacted> - Econ <<redacted>@hient.co.uk>

Cc: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot

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Policy Officer
Disease Prevention Team
Animal Health & Welfare Division
Directorate for Agriculture & Rural Economy
Scottish Government

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bathar-bog gus luchd-obrach na buidhne a dh'ion is cuiridh i às do phost-dealain sam bith sa bheil càil oilbheumach no truailleach.

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Email 16

From: <redacted> <<redacted>@gov.scot>

Sent: 04 October 2021 13:25

To: <redacted>@hient.co.uk

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted>

<<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles Ltd (WCL)

Hi <redacted>, thanks for this. Is this information publicly available on your website (tried to locate it unsuccessfully)?

<redacted>

<redacted>

Animal Health - Disease Prevention | Animal health and Welfare Division | Directorate for Agriculture and Rural Economy | Scottish Government | Tel. <redacted> | Mob.<redacted>

From: <redacted> <<redacted>@gov.scot>

Sent: 01 October 2021 13:54

To: <redacted> <<redacted>@hient.co.uk>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

Subject: RE: Whiteshore Cockles Ltd (WCL)

Hi <redacted>,

Again thank you for your quick response and thanks for the information that you have provided below, it is very helpful.

If we require anything further I will let you know.

Kind Regards

<redacted>

Policy Officer

Disease Prevention Team

Animal Health & Welfare Division

Directorate for Agriculture & Rural Economy

Scottish Government

From: <redacted> <<redacted>@hient.co.uk>

Sent: 01 October 2021 13:50

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>

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Feb 2021

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Eligible costs – construction, steel fabrication and installation

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Kind regards

<redacted>

<redacted>

Interim Area Manager
Innse Gall

DD: <redacted> | Mob: <redacted>

From: <redacted>@gov.scot <<redacted>@gov.scot>

Sent: 01 October 2021 13:02

To: <redacted> <<redacted>@hient.co.uk>

Cc: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot

Subject: RE: Whiteshore Cockles Ltd (WCL)

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From<redacted> <<redacted>@hient.co.uk>

Sent: 30 September 2021 20:12

To: <redacted> <<redacted>@gov.scot>

Cc: <redacted> <<redacted>@gov.scot>; <redacted> <<redacted>@gov.scot>; <redacted>
<<redacted>@gov.scot>; <redacted>) <<redacted>@gov.scot>

Subject: FW: Whiteshore Cockles Ltd (WCL)

Good evening <redacted>

I will be happy to help you with this. If you could let me know what specific information you require I will be happy to respond appropriately. If it would be easier to discuss I am free between 1 and 2 tomorrow on either of the numbers below.

Regards

<redacted>

<redacted>

Interim Area Manager
Innse Gall

DD: <redacted> | Mob: <redacted>

From: <redacted> <<redacted>@hient.co.uk>

Sent: 30 September 2021 17:06

To: <<redacted>@gov.scot>

Cc: <<redacted>@gov.scot>; <redacted>@gov.scot>; <redacted>@gov.scot>; <redacted>@gov.scot>;
<redacted> - Econ <<redacted>@hient.co.uk>; <redacted> <<redacted>@hient.co.uk>

Subject: RE: Whiteshore Cockles Ltd (WCL)

Hello <redacted>,

My colleague <redacted>, interim area manager in the Outer Hebrides, will be able to respond to your enquiry regards grant funding to Whiteshore Cockles Ltd.

Kind regards

<redacted>

From: <redacted>@gov.scot <redacted>@gov.scot>
Sent: 30 September 2021 14:19
To: <redacted> <<redacted>@hient.co.uk>; <redacted> - Econ <<redacted>@hient.co.uk>
Cc: <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot; <redacted>@gov.scot
Subject: Whiteshore Cockles Ltd (WCL)

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Good afternoon <redacted> and <redacted>,

I have been passed your contact details from <redacted>, Head of Marine Grants Team to help clarify a query I have regarding Whiteshore Cockles Ltd (WCL), Whiteshores, Kyles, Pailble, Isle of North Uist, HS6 5DY (Companies House details - Company number SC379476 - 26 Lewis Street, Stornoway, Isle of Lewis, HS1 2JF).

The team I work with have been briefing Ministers, dealing with correspondence from Whiteshore WCL and handling FOI's about the business for several years now and we recently established a task and finish group with wide representation to push the long running WCL "fish dryer" project to completion. In recent correspondence from the Managing Director of WCL to Murdoch McLeod, Deputy Director Financial Services and Location Director for the Outer Hebrides in the Scottish Government, it is stated WCL received support from Highlands and Islands Enterprise (HIE). In the letter, WCL state they received grant funding to assist with the purchase of equipment.

We have asked WCL about funding for their project and been informed it is private funding, perhaps this is a new development? I would be very grateful if someone could provide me with further information about the grant funding that WCL are referring to.

Happy to discuss further if required.

Kind Regards

<redacted>
Policy Officer
Disease Prevention Team
Animal Health & Welfare Division
Directorate for Agriculture & Rural Economy
Scottish Government

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