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Mr Mark Ruskell MSP
The Scottish Parliament
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Dear Mark,

Thank you for your letter of 13 December following up on your written questions you lodged last November in relation to biosecurity concerns around the transportation of salmon mortalities from Scotland's fish farms.

As you will be aware, the Animal By-Products (Enforcement) (Scotland) Regulations 2013 (ABPR) are enforced by local authorities and monitored for compliance by the Animal and Plant Health Agency (APHA). The Scottish Government provides advice on support on the ABPR to local authority and APHA officials as and when it is needed.

Following an inquiry about breaches of the ABPR in relation to salmon mortalities not being transported properly when on route for disposal, we contacted the local authority where the transport company is located. The inquiry focused on the condition of the vehicles being used to transport the salmon mortalities not being compliant with the ABPR. No complaints had been made to the local authority but they confirmed they would look into the standards of the vehicles used by the transport company. Officials in APHA were also made aware of this inquiry as they are responsible for inspecting approved and registered premises under the ABPR. Inspections are carried out on a risk based basis and any complaints made about a company or person approved or registered under the ABPR would increase the likelihood of an inspection from APHA. This inspection process would also include vehicles that are used for transporting animal by-products.

The Scottish Government does not intend to collate and publish information on the number of collections of fish mortalities from fish farms to their final disposal. In May 2016, Zero Waste Scotland published the Finfish Mortalities in Scotland report that highlighted alternative disposal routes following a change in policy that prohibited the disposal of fish mortalities in landfill sites. This report identified disposal routes that are both logistically and commercially viable for the finfish farming industry. The finfish farming industry is still in the process of adjusting to this change in policy and it is expected that more sustainable disposal routes will become available in the future.

The report and further information is available online;

<http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/healthpractice/ZeroWasteMort>. We are also funding a further project which builds upon this work and will help to identify contingency disposal routes for fish mortalities and also provide the basis to assess potential future waste processing capacity requirements.

I remain committed to supporting the Scottish aquaculture industry and ensuring that all growth remains sustainable. This includes through my direct involvement with the Aquaculture Industry Leadership Group and the recently established Strategic Farmed Fish Health Framework Working Group (<http://www.gov.scot/Topics/marine/Fish-Shellfish/Strategic-Framework>).

I trust this is helpful.

Yours sincerely,



FERGUS EWING