



[Health & Safety Executive](#)
[Maritime and Coastguard Agency](#)

15 November 2019

Dear Sir/Madam,

Unsafe & Reckless Behaviour by Mowi Scotland

Please consider this a formal complaint against Mowi Scotland for unsafe and reckless behaviour on 2 November 2019 at their salmon farm at Ardintoul.

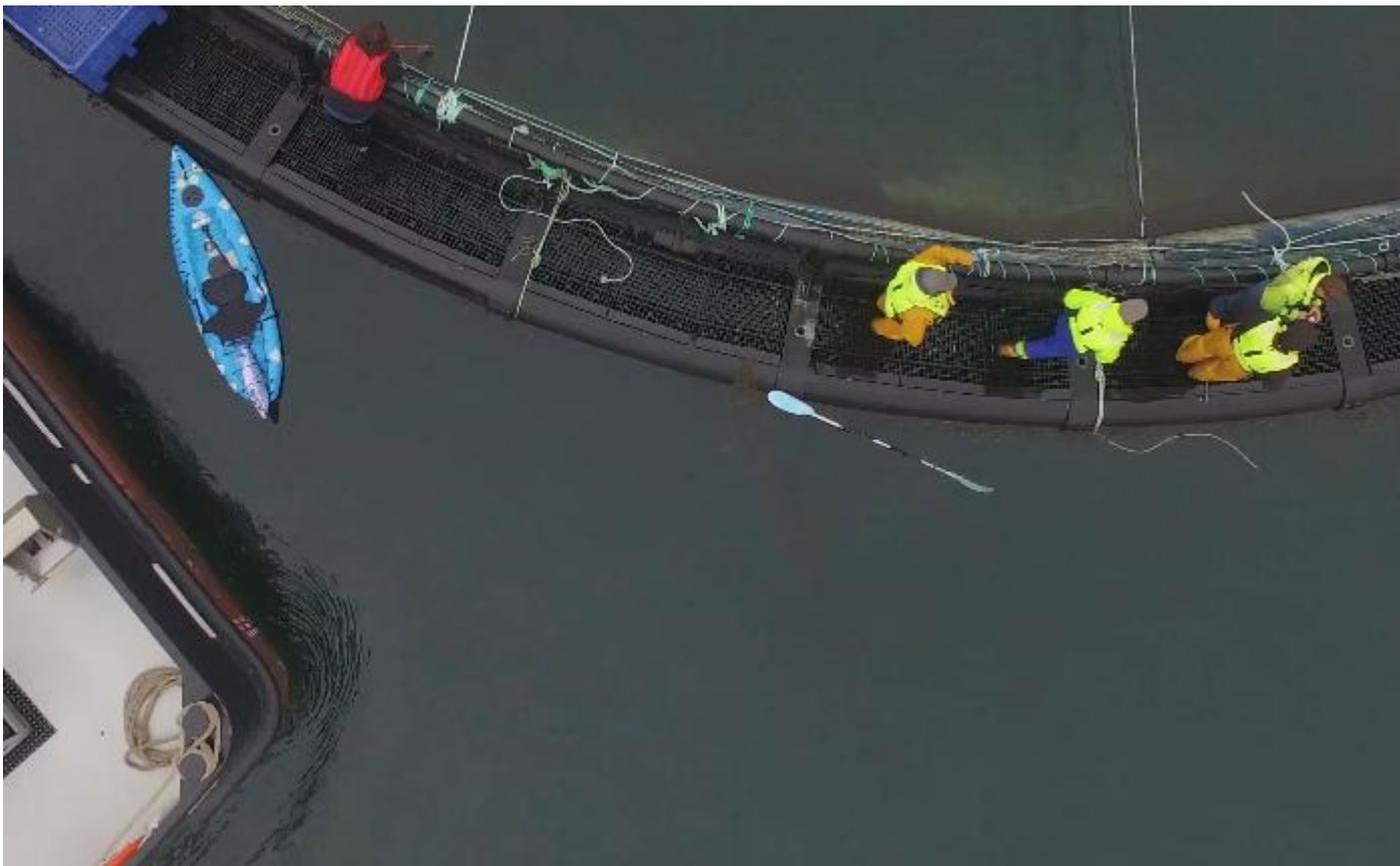
Drone footage clearly shows that Mowi endangered the health and safety of the general public during an inspection of a salmon farm in Loch Alsh 'Special Area of Conservation'.



Mowi staff deliberately rammed a kayak, drove at high speed past a small dingy, unclipped a kayak tied safely to the farm, kicked a paddle into the water and scraped a work boot down

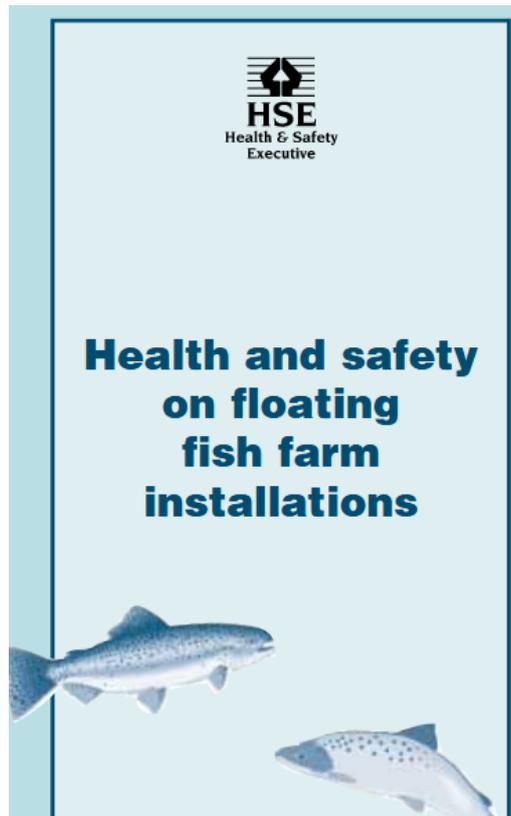
my Achilles tendon. Mowi's behaviour on 2 November 2019 at Ardgour was both reckless and dangerous.





Further photos and commentary are detailed via [Caught on Camera - Mowi's Reckless Breaches of Health & Safety in Loch Alsh](#)

Scottish Salmon Watch believes that Mowi is failing to comply with [Health & Safety](#) rules and regulations.



Both the Health & Safety Executive and Maritime & Coastguard Agency [appear to have jurisdiction in this area](#).

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Statistics
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Scottish Aquaculture Industry Forum

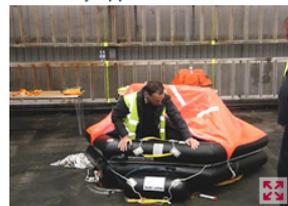
Working in the marine environment is a dangerous occupation.

Regulation of health and safety in the fishing, fish-farming – or, as it's known, the aquaculture industry - involves either HSE or the Maritime and Coastguard Agency (MCA). Both regulators are concerned about the number of deaths and injuries. HSE continues to investigate fatalities in the industry as do the Marine Accident Investigation Branch. There are many injuries and cases of ill health.

Regulatory responsibility for activities at fish cages and associated moored structures as well as cages on land falls to HSE, whilst the MCA deals with activities on board vessels at sea which come under maritime law. Both organisations sometimes need to work together; the Scottish Aquaculture Industry Forum (SAIF) was set up to support close working relations between the enforcement bodies and with the industry itself. As well as HSE and MCA, SAIF membership includes the Northern Lighthouse Board, the Crown Estate, RNLI, Scottish Sea Farms, the Scottish Salmon Company and others

One of the main functions of the SAIF is to promote good practice to achieve compliance with health and safety requirements by the industry whether they operate at sea or from at fixed structures.

The SAIF have adopted HSE's model of Safety and Health Awareness Days to demonstrate practical health and safety approaches.



Related content

- [Report an incident](#)
- [Notify HSE](#)
- [HSE offices in Scotland](#)
- [HSE Publications](#)
- [Statement of forthcoming regulations 2010/2011](#)

As members of the Scottish Salmon Producers Organisation, we do not feel that Mowi is adhering to the ['Code of Good Practice'](#).

HEALTH & SAFETY ON FINFISH FARMS

The health and safety of farm staff and visitors to finfish farms is of vital importance to the companies, to the industry and to the wider community. Many of the practices designed to ensure health and safety are a matter of statute. With the high level of importance attached to health and safety in aquaculture operations, reference to existing and emerging guidance and associated documentation should be sought through the [Health and Safety Executive](#) (HSE), the [Maritime and Coastguard Agency](#) (MCA) and the Environmental Health Department of the Local Authority.

Since Scottish Salmon Watch plans further unannounced site inspections and sampling near salmon farms it is hoped that a protocol can be put in place urgently to properly police surveillance of this unhealthy and unsafe industry.

In September 2019, Scottish Salmon Watch [wrote to the Maritime & Coastguard Agency](#) expressing serious concerns with respect to the reckless behaviour of Mowi (over two months later we have still not received a reply).



Brian Johnson
Chief Executive
[Maritime & Coastguard Agency](#)
infoline@mca.gov.uk

12 September 2019

Dear Mr Johnson,

Navigation Concerns re. Salmon Farms Operating in Public Waters - the Fish Farm Menace & Threats to Public Safety

Scottish Salmon Watch is writing in respect of the [Maritime & Coastguard Agency's responsibility for the "safety of everybody in a vessel in UK waters" and the "environmental safety of UK coast and waters"](#). Our experiences on 1 September 2019 in the waters around Shuna raise serious concerns about safety and the reckless operations of [salmon farming giant Mowi](#) in particular who we believe ignored the ['rules of the road'](#).



Scottish Salmon Watch is concerned that Mowi's intimidation and menacing behaviour, if left unchecked, will escalate and cause further safety hazards. With more protests and sampling close to salmon farms planned for the coming months ([predicted by Mowi's Health Manager to be a "painful" time for disease](#)), Scottish Salmon Watch is worried for the safety of our kayaks operating in public and navigable waters.

In August and July 2019, Scottish Salmon Watch [wrote to the Health & Safety Executive, Police Scotland, the Cabinet Secretary for Justice and other agencies proposing guidelines for filming with respect to salmon farms](#) (thus far there has been no reply).



Police Scotland: Contactus@scotland.pnn.police.uk
 Cabinet Secretary for Justice (Humza Yousaf): scottish.ministers@gov.scot
 Animal & Plant Health Agency: APHA.Scotland@apha.gsi.gov.uk
 Scottish Government Fish Health Inspectorate: ms.fishhealth@gov.scot
 Scottish Environment Protection Agency: terry.ahearn@sepa.org.uk
 Crown Estate Scotland: Alex.Adrian@crownstatescotland.com
 Health & Safety Executive: Penny.Falconer@hse.gov.uk
 Marine Concern: mc@marineconcern.com

6 August 2019

Dear Sir/Madam,

Protocol & Guidelines for Filming Salmon Farms

Further to [Scottish Salmon Watch's letter of 21 July](#), would it be possible to draft a protocol and guidelines for filming with respect to salmon farms?

Scottish Salmon Watch is keen to ensure that specific events planned for the weekend of 31 August/1 September proceed safely and legally. It is disappointing that our letter of 21 July (re-enclosed for easy reference and available [online here](#)) has not received a single reply especially since the issue warranted recent media coverage via [The Ferret](#) (2 August).

As supporting evidence, Scottish Salmon Watch has the offending drone footage as a video file. What is the best email address to share this video evidence with you?



Yours sincerely,

Don Staniford

Director, Scottish Salmon Watch

