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Mr Don Staniford

By email: salmonfarmingkills@gmail.com

Our ref: 2018/0003271
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Dear Mr Staniford

2018/0003271 Cooke violations of code of practice for ISA

2018/0005132 PRV in salmon processing plant effluent

2018/0005352 Government to audit fish processing plants that release bloody waste water

Thank you for your emails to Roseanna Cunningham, Cabinet Secretary for Environment, Climate Change and Land Reform, Fergus Ewing, Cabinet Secretary for Rural Economy and Connectivity, Members of Scottish Parliament and Scottish Government officials regarding aquaculture processing plant effluent. I have been asked to respond to these as aquaculture falls within my policy area.

The Scottish Government takes its commitment to the environment seriously. All activity can have an impact on the environment and it is essential that unacceptable risks are identified and the impacts proportionately and effectively managed.

Controls are in place to control discharges at processing plants under The Water Environment (Controlled Activities) (Scotland) Regulations 2011. The purpose of the CAR licence is to control any chemicals in the discharge and any impacts on environmental parameters such as biological oxygen demand and temperature (rather than fish pathogens). I have been in touch with the Scottish Environment Protection Agency (SEPA) regarding the incident referred to in your email 'Cooke violations of code of good practice for ISA' and they have provided the following information;

'Following an anonymous complaint about odour and effluent discharge from Cooke Aquaculture Scotland's site at Mid Yell in August 2017, a SEPA officer attended the site to carry out an inspection. This inspection identified problems with odour and a slight discharge of effluent from a manhole cover.

A meeting was held between Cooke Aquaculture Scotland and SEPA, and the operator agreed immediate actions to address odour and effluent discharge, including improved cleaning of the filtration system, alterations to the manhole cover and improved bunding. Cooke Aquaculture Scotland has confirmed that the agreed immediate actions were completed and has supplied evidence to prove this.

SEPA's interim inspection report recorded that the effluent discharge was untreated; this was based on the information supplied by the operator at the time of the inspection in August 2017. The company has since advised that the discharge from the manhole had undergone treatment, and has provided further information on the processing systems to substantiate this. SEPA have scheduled a follow-up inspection this month to examine this further information, and to review all the issues raised by our inspection in 2017, and is continuing to work with Cooke Aquaculture Scotland to ensure the site is compliant with all regulations and licences.'

With regards to fish disease, Piscine Orthoreovirus (PRV) and processing plant effluent, the Scottish Government does not conduct testing of processing effluent for fish pathogens. Many infections which can be carried by farmed fish are present naturally within the wider environment. Scottish Government will continue to consider best available evidence to ensure that the interactions of wild and farmed fish are appropriately managed. Processing plants may pose a risk of concentrating fish pathogens in the environment and these risks can be mitigated by biosecurity protocols. As you are aware, the Code of Good Practice for Scottish Finfish Aquaculture contains a chapter on processing sites and states that drainage from areas where effluent and fish by-products are generated should feed into a disinfection facility, with subsequent treatment and discharge in accordance with CAR license conditions. Scottish Government's fish health inspectorate produced disinfection guidance in 2006 which should be regarded as best practice at fish farm sites and processing plants. The guide can be found online; <http://www.gov.scot/Topics/marine/Fish-Shellfish/FHI/healthpractice> A copy is also available as an annex to the Code (Annex 4).

Please be assured that processing plants handling fish culled for disease control purposes, (for example fish culled for the control of infectious salmon anaemia) must be authorised by Scottish Government's Fish Health Inspectorate under the Aquatic Animal Health (Scotland) Regulations 2009. This will be done where Scottish Ministers are satisfied that the operation and biosecurity of the establishment will not lead to an unacceptable risk of spreading disease. In addition, where a listed disease occurs the fish health inspectorate will consider the sampling of wild fish as part of any epidemiological investigation. This provides information on the state of the environment in terms of the presence of the pathogen in relation to susceptible wild species.

I hope this helps to address your concerns

Yours sincerely

Jill Barber
Aquaculture Policy Advisor