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21 July 2019

Dear Sir/Madam,

Protocol & Guidelines for Filming Salmon Farms

Would it be possible to draft a protocol and guidelines for filming with respect to salmon farms?

During 2018 and 2019 Scottish Salmon Watch has been filming at salmon farms and we are planning further filming in the coming weeks with a 'Salmonwatch' weekend of citizen science and surveillance scheduled for 31 August & 1 September.



Read more via:

['Salmonwatch' Exposes Scottish Salmon's Dirty Secrets](#)

[Shocking Video Footage from Mowi's 'Bay of the Dead Heads' \(Bagh Dail nan Ceann\)](#)

[Photos of Secret Filming at Scottish & Irish Salmon Farms](#)

[Campaigners call for urgent investigation of all Scottish salmon farms](#)

['Salmonwatch' Launched in Scotland](#)

[Biosecurity Precautions for Filming Salmon Farms](#)

Scottish Salmon Watch will re-visit [Mowi](#) salmon farms at [Poll na Gille \(rated the worst in Scotland from a welfare perspective\)](#) and [Bagh Dail nan Ceann](#); the [Kames](#) salmon farm at [Rubh an Trilleachain in Shuna Sound \(a site already exhibiting welfare problems\)](#); [The Scottish Salmon Company](#) in [Loch Fyne](#); and [Scottish Sea Farms](#) sites at [Dunstaffnage in the Firth of Lorne](#) and [Shuna in Loch Linnhe](#).



When Scottish Salmon Watch visited the latter on 3 July we were [ordered by Police Scotland to leave the area](#) (we were not even inside the lease area at the time) and seek permission of the [privately owned Norwegian company Scottish Sea Farms](#) to be in public waters.



Read more via [Police Scotland Acting as Private Security Enforcement for Norwegian-Owned Scottish Sea Farms?](#)

When Scottish Salmon Watch [filmed in May 2019](#) at Mowi's [ASC-certified](#) salmon farm in Loch Leven, I understand that Mowi filed a report with Police Scotland.



When Scottish Salmon Watch [filmed at The Scottish Salmon Company's salmon farm in Loch Shieldaig](#) in June 2019 we filed two complaints with Police Scotland, APHA and Marine Scotland (read [online here](#) and [online here](#)).



It is known via [data released by the Scottish Government via Freedom of Information](#) that over half of farmed salmon tested in 2018 and 2019 were positive for Piscine Reovirus (PRV). Hence we will be testing water samples and any dead fish we find floating in public waters.



Scottish Salmon Watch would like to engage with the appropriate authorities to establish a safe and bio-secure zone for filming, diving and sampling. We believe we have followed bio-security and disinfectant guidelines to the letter and last year [sought the advice of the Scottish Government](#) who advised following the [SSPO's Code of Good Practice](#) and the [Disinfectant Guide](#).

However, there appears to be a grey area in terms of proximity and [Police Scotland's recent advice](#) (which Scottish Salmon Watch has questioned) with respect to requiring explicit permission from the salmon farming company raises serious concerns. Indeed, you could argue that by blocking navigation between rows of cages with plastic feed pipes that salmon farms are infringing upon public rights in navigable waters.



Scottish Salmon Watch has specific concerns with respect to [firearms being used on site to kill seals](#) and requests that there is a Scottish-wide cease-fire on salmon farms over the weekend of 31 August/1 September. I plan to be in the water in close proximity to salmon farms wearing a seal suit so would appreciate not being shot at.



Scottish Salmon Watch also has concerns regarding the [use of toxic chemicals at salmon farms](#) and [via well boats](#). Scientific research [published by the Scottish Aquaculture Research Forum](#) in 2016 showed how [Emamectin benzoate is lethal to lobsters](#).



Data published by SEPA shows that salmon farmers have [reported the use of Emamectin, Azamethiphos and Deltamethrin during 2019](#). However this data is now some four months out of date with information only available up to March 2019.

Could advance notice be given in terms of which salmon farms are using toxic chemicals over the next few months so that Scottish Salmon Watch can take necessary precautions?

For example, we know that [Mowi's Bagh Dail nan Ceann salmon farm](#) has used multiple doses of toxic chemicals since fish were first stocked in September 2018. It reported [the use of the lobster-killing Azamethiphos in March 2019](#).

Fish Farm Monthly Biomass and Treatments Details	
Year	2019
Month	March
Submitted By	Mowi Scotland Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	2027
Biomass Exceedance (tonnes)	0
Feed (kg)	474947
Mortalities (kg)	4869.0257201657
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	2400.0000357628
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0

Data supplied by SEPA on 19/06/2019

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map

Data supplied by SEPA on 19/06/2019

And [again at the same Mowi salmon farm in November 2018](#):

Fish Farm Monthly Biomass and Treatments Details	
Year	2018
Month	November
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	513
Biomass Exceedance (tonnes)	0
Feed (kg)	223452
Mortalities (kg)	1583.1158476454
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	400.0000059605
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0
Data supplied by SEPA on 19/06/2019	

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map
Data supplied by SEPA on 19/06/2019	

And lobsters in the vicinity of Mowi's salmon farm were [subjected to another dose of the toxic Azamethiphos in October 2018](#):

Fish Farm Monthly Biomass and Treatments Details	
Year	2018
Month	October
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	295
Biomass Exceedance (tonnes)	0
Feed (kg)	148604
Mortalities (kg)	2612.8177097660
Seallice Treatments Used	
Seallice Treatment Product	Quantity Used (grams)
Azamethiphos	400
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	0
Teflubenzuron	0
Data supplied by SEPA on 19/06/2019	

Location Details	
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Data supplied by SEPA on 19/06/2019	

As well as a [dose of the toxic lobster-killer Emamectin benzoate in September 2018](#):

Fish Farm Monthly Biomass and Treatments Details	
Year	2018
Month	September
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1004226/V6
Licence active at time of report	CAR/L/1004226
Report for Site	FFMC54 Bagh Dail nan Ceann North and South
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	107
Biomass Exceedance (tonnes)	0
Feed (kg)	35117
Mortalities (kg)	3369.4320135666
Sealice Treatments Used	
Sealice Treatment Product	Quantity Used (grams)
Azamethiphos	0
Cypermethrin	0
Deltamethrin	0
Emamectin Benzoate	46.40
Teflubenzuron	0

Data supplied by SEPA on 19/06/2019

Location Details	
Receiving Water	Sound of Jura
National Grid Reference	NM77450451
View on Map	View on map

Data supplied by SEPA on 19/06/2019

At which salmon farms is Mowi and other salmon farming companies planning to use toxic chemicals during August and September? Would it be possible to cease using toxic chemicals for the weekend of 31 August/1 September?

In conclusion, Scottish Salmon Watch would appreciate your thoughts on drafting a protocol and guidelines for filming with respect to salmon farms. We appreciate that this is a controversial subject but we want to ensure safety and bio-security as well as enshrine ancient public rights to water and navigation.

To avoid confrontation and litigation, I would be happy to meet with the Police Scotland and representatives from Mowi, The Scottish Salmon Company, Kames and Scottish Sea Farms prior to filming, sampling, swimming and diving during the weekend of 31 August/1 September.

Yours sincerely,

Don Staniford

[Director, Scottish Salmon Watch](#)