

[Redacted]

From: [Redacted]
Sent: 10 March 2020 12:30
To: [Redacted]
Subject: RE: Seal Licence - SW07/W - MOWI - Request for additional allocation - MS LOT to Consultees - 09 March 2020
Attachments: Comments on SW07 - 2020 W Mowi (Scotland) Ltd.docx

Good morning [Redacted]

I agree entirely with your comments regarding the addition of one more seal and the impact (or lack of) that could result from it. I've had a look at other farms in the area, and the next closest (~30km) away is Tarbert South (FS0767) which have reported the shooting of 2 Grey (02/05 and 02/03) and 1 harbour (03/03) nothing else has been reported shot within a 50km (swimming distance) of this one farm.

To summarise the data provided in the surveys this site has shot the following seals:

- 2016 – 1 Grey
- 2017 – 1 Harbour
- 2018 – no seal shot
- 2019 – 1 Grey

There have been no changes to the farm set up over the last 24 months, morts are removed daily by ROV; nets are only checked every two weeks, ADD's are in constant use when the farm is stocked and rated 4 for efficacy. Anti-predation nets are used but only rated 2 for efficacy. No additional non-lethal measures in use. I've also attached the initial consultation response provided for this site by FHI.

Based on the above information, do you have any further comments?

Cheers
[Redacted]

From: [Redacted] @st-andrews.ac.uk>
Sent: 09 March 2020 12:03
To: [Redacted] @gov.scot>; [Redacted] @gov.scot>
Subject: RE: Seal Licence - SW07/W - MOWI - Request for additional allocation - MS LOT to Consultees - 09 March 2020

Hi [Redacted]

Thanks for your email regarding seal predation at the MOWI fish farm off east Kintyre.

In theory, there is no reason not to increase their allocation for harbour seals.

However, there does seem to be high predation by seals at this site and, unless the specific seal causing the damage is removed, increasing their allocation may have no impact on the damage to caged fish whatsoever.

It does seem surprising that seals are able to enter cages. We wonder whether their existing antipredator systems can be functioning properly?

Do other MOWI farms in reasonably close vicinity have similar issues? Are their defence systems teh same?

Hope this helps,

Yours,

[Redacted]

Sea Mammal Research Unit
Scottish Oceans Institute
University of St Andrews
East Sands
St Andrews KY16 8LB
Fife, Scotland

General tel: [Redacted]
Direct tel: [Redacted]
Email: [Redacted]@st-andrews.ac.uk
Web: <http://www.smru.st-andrews.ac.uk/>

The University of St Andrews is a charity registered in Scotland : No SC013532

From: [Redacted] @gov.scot]
Sent: 09 March 2020 11:23
To: [Redacted] @st-andrews.ac.uk>; [Redacted] @gov.scot
Subject: Seal Licence - SW07/W - MOWI - Request for additional allocation - MS LOT to Consultees - 09 March 2020

Good morning,

MOWI have requested additional numbers to be added to their SW07 licence.

Attached is the original application and also the licence that was issued, below is the email correspondence we have had in support of the additional allocation.

We granted 2 grey and 1 harbour and one of each have already been shot (12 Feb and 3 March).

Do you have any concerns if we were to add an extra 1 harbour seal to this licence?

Kind regards
[Redacted]

From: [Redacted] @mowi.com>
Sent: 24 February 2020 13:41
To: [Redacted] @gov.scot>
Subject: RE: Request to increase licence for Common/Harbour seal

Hi [Redacted]

The response from the site is as follows;

At the moment we have tried bullet points listed below.

- Calibrated all cage nets to tighten sides.
- Extra centre weights added to nets making base tighter.

- Mortality retrieval daily with ROV hoover system
- Seal fence (OTAQ) working to its full legal capacity.
- Contracted professional Marksman to dispatch allocated seal number earlier this month.

We are continually having seal kill.

To deploy a predator net around the site would be disastrous as we have a lot of eider ducks, Cormarants, dolphins, porpoises, basking sharks.

Mortality Numbers attributed to seal kill

	North Site	South Group	Total
August	0	0	0
September	10	46	56
October	9	41	50
November	508	817	1325
December	2228	3452	5680
January	955	1508	2463
February	573	2647	3220
Total	4283	8511	12794

Since smolt in-take there has been constant seal activity around the both sites at Carradale. Wild Life diary has daily entries.

Containment checks take place which are all documented to ensure predator and jump nets are tied off and secure.

This has impact to containment which are regularly checked during mortality retrieval and net washing and fortnightly inspection by contract divers.

Mowi, Seal dispatch protocol has been implemented regarding the tensioning of nets and ADD usage.

I hope this backs our request sufficiently, I look forward to hearing back from you.

Kind regards

[Redacted]

From: [Redacted] [@gov.scot](mailto:) <[Redacted] [@gov.scot](mailto:)>
Sent: 20 February 2020 09:36
To: [Redacted] [@mowi.com](mailto:)>
Subject: RE: Request to increase licence for Common/Harbour seal

Good morning [Redacted]

The information provided does not really demonstrate the shooting of the seal was the last resort or support why additional seal numbers should be added to the licence.

Although I mentioned weather, number of cages and was the seal in the cage they were only suggested ideas of where to start giving us information on the circumstances that lead to the shooting of the seal and subsequent request to vary the licence.

I draw your attention to the Marine Scotland (2010) Act Part 6 Conservation of Seals, in particular the highlighted text.

110 Seal licences

(1)The **Scottish Ministers may grant a licence (a “seal licence”) authorising the killing or taking of seals—**

(a)for scientific, research or educational purposes,

(b)to conserve natural habitats,

(c)to conserve seals or other wild animals (including wild birds) or wild plants,

(d)in connection with the introduction of seals, other wild animals (including wild birds) or wild plants to particular areas,

(e)to protect a zoological or botanical collection,

(f)to protect the health and welfare of farmed fish,

(g)to prevent serious damage to fisheries or fish farms,

(h)to prevent the spread of disease among seals or other animals (including birds) or plants,

(i)to preserve public health or public safety, or

(j)for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.

(2)Before granting a seal licence under subsection (1)(g), the Scottish Ministers must have regard to any information they have about—

(a)damage which seals have already done to the fishery or fish farm concerned or to any other fishery or fish farm which is in the vicinity of, or which is of a similar type to, the fishery or fish farm concerned, and

(b)the effectiveness of non-lethal alternative methods of preventing seal damage to the fishery or fish farm concerned or to any other fishery or fish farm which is in the vicinity of, or which is of a similar type to, the fishery or fish farm concerned.

(3)The Scottish Ministers may require an applicant for a seal licence under subsection (1)(g) to provide them with such information about the matters mentioned in paragraphs (a) or (b) of subsection (2) as they reasonably require for the purposes of assisting them to decide whether to grant the seal licence.

116 Consultation and consent

(1)The Scottish Ministers **must consult** [F1United Kingdom Research and Innovation] **before granting or varying a seal licence.**

(2)The **Scottish Ministers must obtain the consent of Scottish Natural Heritage before granting or varying a seal licence** authorising the killing or taking of seals in a protected area for a purpose mentioned in any of paragraphs (b) to (e) of section 110(1).

“protected area” means—

(a)a Nature Conservation MPA,

(b)a Demonstration and Research MPA,

(c)a Historic MPA,

(d) a site of special scientific interest,
(e) an area in respect of which a nature conservation order or land management order made under Part 2 of the Nature Conservation (Scotland) Act 2004 (asp 6) has effect,
(f) a nature reserve (within the meaning of Part 3 of the National Parks and Access to the Countryside Act 1949 (c.97)), or
(g) a European site (within the meaning of regulation 10 of the Conservation (Natural Habitats, &c.) Regulations).

Also see attached the survey information you have provided over the last 5 applications showing how many seals were granted on this licence, how many were shot, details of anti predation methods employed etc.

To proceed, please provide a reasoned justification for the additional request so that a consultation can be undertaken and a determination made.

Kind regards
[Redacted]

From: [Redacted] <[\[Redacted\]@mowi.com](mailto:[Redacted]@mowi.com)>
Sent: 19 February 2020 16:01
To: MS Marine Licensing <MS.MarineLicensing@gov.scot>
Subject: RE: Request to increase licence for Common/Harbour seal

Good afternoon [Redacted]

I have asked the site manager for more detail on the circumstances and his response is as follows;

Numbers of cages varies from 5 to 12 pens of which 3 or 4 have a high number from seal damage. The weather makes no difference rough or calm we still see seal damage.

Going around the farm you will see the seals popping up around you and yes there was one seal in a pen.

Any other questions please let me know.

Kind regards

[Redacted]

From: MS.MarineLicensing@gov.scot <MS.MarineLicensing@gov.scot>
Sent: 19 February 2020 14:40
To: [Redacted] <[\[Redacted\]@mowi.com](mailto:[Redacted]@mowi.com)>
Subject: RE: Request to increase licence for Common/Harbour seal

Good afternoon [Redacted]

Thank you for your email.

Other than the number of fish can you provide some additional detail around the circumstances of the predation event please? Eg weather conditions, number of cages effected, was the seal in the cage

Kind regards
[Redacted]

From: [Redacted] <[Redacted]@mowi.com>
Sent: 17 February 2020 16:54
To: MS Marine Licensing <MS.MarineLicensing@gov.scot>
Cc: [Redacted] <[Redacted]@mowi.com>; [Redacted] <[Redacted]@mowi.com>
Subject: Request to increase licence for Common/Harbour seal

Good afternoon

I write to request an increase to our licence to shoot one more common/harbour seal at our Eilean Grianain site please.

As you are aware we are only permitted to shoot one based on the current licence attached and we were required to use this on the 12th of February due to a loss of 7975 fish at that point.

The site manager has advised that we are still losing 250 fish per day and the defence system is not dealing with the seals they are experiencing.

Please can you advise how we go about increasing our allocation in order to protect the fish welfare at this site.

Best regards

[Redacted]

Mowi Scotland Ltd.

Mobile: [Redacted]
DDI: [Redacted]
Mail: [Redacted] <[Redacted]@mowi.com>

Office: Mowi
Farms Office
Glen Nevis Business Park
Fort William
PH33 6RX



This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return. Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

This email has been scanned by the Symantec Email Security.cloud service.
For more information please visit <http://www.symanteccloud.com>
