



Don Staniford
salmonfarmingkills@gmail.com

Our Reference: 202100209434

25 June 2021

Dear Mr Staniford,

Thank you for your letter of the 27 May 2021 to the Scottish Ministers about the breach of EU law on the continued dumping of disease salmon in landfill. I have been asked to reply on behalf of Ms Mairi Gougeon MSP, the Cabinet Secretary for Rural Affairs and Islands.

As you will be aware, the disposal of fish waste by burying it in a landfill was banned on 1 January 2016. This was following an investigation by the European Commission that concluded the aquaculture industry in Scotland could not take advantage of a derogation that allows animal by-products to be burned or buried on site or disposed of by other means under official supervision in remote areas of Scotland. The Scottish Government amended the Animal By-Products (Enforcement) (Scotland) Regulations 2013 so that the remote area derogation applied to terrestrial livestock animals only to ensure compliance with European legislation. However, the European Commission granted the Scottish Government two derogations to allow the continued disposal of fish waste by burial. One derogation was for Shetland to allow time to construct a storage facility to bulk up fish waste before it is sent for disposal. This work was completed within the expected timescale of June 2016. The second derogation was for Whiteshore Cockles Ltd (WCL), Bayhead, North Uist to install a drying system for processing fish waste.

The derogation for WCL was originally granted a six month derogation to complete the fish waste dryer. However, it has been extended due to a number of unforeseen setbacks from the original planning stage through to purchasing and the installation of equipment. The current derogation that allows WCL to bury fish waste on site is in place until they obtain Pollution Prevention and Control (PPC) Part A from the Scottish Environment Protection Agency.

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Whilst we take your concerns seriously removing the current derogation may jeopardise the completion of the fish dryer. The fish waste dryer WCL are building will be an environmentally sustainable alternative to landfill and will produce by-products of fertiliser and fish oil. This solution will reduce the energy required to process and transport this waste stream and eliminate the need for it to be buried on site.

I hope this answers your queries.

Yours sincerely

Ian Murdoch
AHW : Disease Prevention

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