FOI Dossier on Wester Ross Fisheries Processing Plant in Dingwall (24 March 2014)

- 'Seriously Non-Compliant' effluent & "illegal discharge" causes river of waste, contaminated water, fish scales, sewerage fungus, fish guts and 'odour issues'

Source material obtained via Freedom of Information (FOI) in February 2014 from Scottish Water, Highland Council and the Scottish Environment Protection Agency (SEPA) - key documents available online here

Summary:

Discharge data from 2005 to 2014 provided by Scottish Water revealed 129 "parameter failures" including 58 "serious parameter failures" (a 17.25% failure rate) - including an 80% failure rate for 'free oil and grease' leading to an overall assessment in February 2014 of "Seriously Non-Compliant".

Wester Ross Fisheries received repeated warning letters from Scottish Water for "parameter failure" and "serious parameter failure" relating to "illegal discharge" of effluent. Scottish Water have issued repeated "Notification of Non-Compliance" and "Notification of Serious Non-Compliance" letters for breaches of total suspended solids, biological oxygen demand and solvent extractable material (fats oils & greases).

Minutes of a meeting in May 2012 between Scottish Water and Wester Ross Fisheries reported that the Waste Water Treatment Plant at Dingwall "was still reporting fish scales entering the works on a regular basis".

In 2011, SEPA reported that "odour issues" had been "ongoing for 6-8 years" with lorries "leaching contaminated water" which is "entering the drains and then running untreated into the River Peffrey".

Highland Council wrote to Wester Ross Fisheries in 2011, 2010 and 2009 reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996. One contravention in 2010 stated that: "the vacuum packs stored uncovered in the box store are open to contamination by condensation falling from the metal roof". Another in
2010 stated that: "the brush strip at the Despatch Door of the factory was missing allowing pests access to the premises".

In 2010, Scottish Water wrote to Wester Ross Fisheries stating that they were "greatly concerned about the large quantities of fish scales appearing at the Dingwall Wastewater Treatment Plant". According to Scottish Water, the fish scales from the farmed salmon processing plant were "choking the inlet screens".

In 2010, SEPA recorded an 'Environmental Event Report' following a complaint regarding "oil in gully pot" and an inspection which found "pools of blood on the road". In 2009, SEPA recorded an 'Environmental Event Report' following a complaint detailing "fish waste discharged into River Peffery". SEPA found "evidence of fish waste in the river" with "scales and fish guts evident from the surface water drain downstream" and "evidence of sewage fungus growing within the river".

Wester Ross Fisheries told Scottish Water in 2008 that they "are encountering problems with our plan to install fat trap" and "will have to look at a much bigger trap". In 2006, Scottish Water reported "a large amount of fish fins/parts of tails" entering the Wastewater Treatment Plant in Dingwall. In 2005, minutes of a meeting between Scottish Water and Wester Ross Salmon reported "high fat recordings".

**Background:**

The Peffery Restoration Project is a project that is bringing together Cromarty Firth Fisheries Trust (CFFT), Cromarty Firth District Salmon Fishery Board (CFDSFB), Moray Firth Sea Trout Project (MFSTP), Area Advisory Group (AAG), Scottish Environment Protection Agency (SEPA), Scottish Water, Moray Firth Partnership (MFP), landowners, Forestry Commission, Dingwall Environment Group (DEG) and Trust for Conservation Volunteers (TCV) to work towards the restoration of the entire River Peffery catchment (read more online here).

Both SEPA and Scottish Water admitted that they did NOT monitor for sea lice in effluent - despite a scientific paper published in the Journal of Aquatic Animal Health in December 2013. "Marine salmon farms and their processing facilities can serve as sources of virulent fish pathogens," reported the scientific paper Fish Processing Facilities: New Challenge to Marine Biosecurity in Canada. "We found live salmon lice Lepeophtheirus salmonis, mucus, and fish tissue in effluent from the processing facility. Sea lice transmitted from this source may pose a threat to wild salmon populations, and the release of untreated offal, including blood water, is of considerable concern. Further research is needed to quantify the extent to which processing facilities release sea lice and to determine whether more virulent fish pathogens are present in effluent. These data underscore the need for fish farming nations to develop mandatory biosecurity programs to ensure that farmed salmon processing facilities will prevent the broadcast of infectious fish pathogens into wild fish habitat." "Behavioral cues during microscope observation confirmed that the parasites were alive: eggs hatched into nauplii, and both the males and gravid females showed mobility," reported the scientific study.

“Sea lice and other disease vectors transmitted from facilities processing farmed fish from across the province may pose a threat to wild salmon populations,” said University of
Victoria marine ecologist Dr. John Volpe, a co-author of the paper in a press release (19 December 2013). “Our study demonstrates that disease transmission is possible from farmed fish to wild fish through the tissue, blood and mucus released in untreated farmed salmon offal. If live sea lice eggs are pouring out of farmed salmon processing plants, it is likely that infectious bacteria and viruses are as well,” says Volpe, adding that more research is needed to determine the extent of sea lice release and whether more virulent fish pathogens are present in fish farm effluent.

Data published by the Scottish Salmon Producers Organisation reveals that salmon farms in Wester Ross are infested with sea lice (read more via the West Highland Free Press: "Wester Ross fish farms under fire over sea lice outbreaks"). In March 2014, the Salmon & Trout Association reported:

"The latest SSPO quarterly sea lice report (for October to December) reveals that average lice numbers were over thresholds in 13 out of 30 areas for which data is reported by the industry. Particular hotspots yet again included ‘Kennart to Gruinard’ in Wester Ross where there are seven farms operated by two companies, Wester Ross Fisheries Limited and Scottish Sea Farms Limited. The monthly lice count on farms in this area was between five and ten times the threshold between October and December last year. Lice have been over the threshold in this area for an entire year now, despite three area-wide treatments and a staggering 25 other treatments for lice."

In December 2013, the Salmon & Trout Association stated that Wester Ross Fisheries had "an appalling sea lice record". "The sea-lice numbers in the region where Wester Ross Fisheries have all their marine farms are shocking and the salmon farmers in these areas have lost all control," claimed the S&TA in a press release (12 December 2013).

A FOI reply from the Animal Health and Veterinary Laboratories Agency in February 2014 revealed that in October 2013 "sea lice numbers were rising" at Wester Ross Fisheries and the farmed salmon had "severe proliferative gill disease". Last year, Protect Wild Scotland revealed that Wester Ross Fisheries had been guilty of over a decade of "unsatisfactory" pollution and non-compliance at their salmon farm sites in Wester Ross (according to data supplied by SEPA via FOI in September 2013).

Information obtained by Protect Wild Scotland from SEPA via Freedom of Information in September 2013 revealed that Wester Ross Fisheries (Wester Ross Salmon) has breached pollution limits for over a decade at their salmon farm sites in Little Loch Broom, Loch Broom, Loch Kannaird and Elphin Hatchery (read more via "Unsatisfactory" Wester Ross Salmon – A Decade of Pollution!).

"In view of the recent scientific concerns raised in Canada, Protect Wild Scotland urges SEPA, Scottish Water and local authorities across Scotland to convene a task force to tackle the threats of the spread of sea lice and infectious diseases via processing plant effluent," wrote Protect Wild Scotland in a letter (7 March 2014) to Scottish Water, SEPA, Highland Council and other agencies. "Please help protect wild salmonids from the threats posed by processing plants discharging diseased wastes into Scotland's waterways. It beggars belief that no public agency appears to be monitoring for sea lice and infectious diseases in processing plant effluent."
The FOI requests to Scottish Water, Highland Council and the Scottish Environment Protection Agency were prompted by testimony in January 2014 from whistleblower John Craig - a former employee at the Wester Ross Fisheries processing plant in Dingwall:

**OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.**

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:

Firstly the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was where the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.

I sincerely hope the foregoing will be of some assistance and enlightenment to you and if I can be of any further assistance please do not hesitate to ask.

Regards,

John Craig.
Scottish Water explained in February 2014: "This company [Wester Ross Fisheries] has had a consent to discharge effluent to sewer since at least 1998 when it was consented by NoSWA. The consent and subsequent amendments to it would contain limits for volume, flow and normal sanitary determinands such as pH, suspended solids, biochemical and chemical oxygen demand and fats/oils, but we would never have restricted or monitored for the discharge of sea lice or their eggs. All analytical information would relate the parameters contained in the consent. Scottish Water would not monitor environmental health issues as these are the responsibility of the local council’s Environmental Health department. Inspection reports would relate to the sample point - assessing it from a safety point of view. Any pollution incident reports would relate to breaches of the limits contained in the consent. Scottish Water doesn’t monitor for sea lice or infectious diseases in an effluent monitoring programme.”

The consent issued by Scottish Water to Wester Ross Fisheries (October 2011) includes:

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Scottish Water

Sewerage (Scotland) Act 1968, Section 32

Consent

THIS IS A LEGAL DOCUMENT WHICH DETAILS YOUR COMPANY’S AUTHORISATION TO DISCHARGE TRADE EFFLUENT INTO THE PUBLIC SEWER FROM THE PREMISES STATED.

ITS CONTENTS SHOULD BE NOTED, AND THE DOCUMENT KEPT IN A SAFE PLACE FOR FUTURE REFERENCE.

The Preamble

WHEREAS Wester Ross Fisheries Ltd (“the occupier”), Company registration number SC297376, whose registered office is situated at Kinnaird House, Ardnaclaire, Ullapool, IV26 2TN, and are the occupiers of the trade premises situated at Taigh Na Bradan, Strath View, Dingwall Business Park, Dingwall, IV15 9XD (“the trade premises”), has requested Scottish Water (“SW”) established under Section 20 of the Water Industry (Scotland) Act 2002 and having its principal office at Castle House, 6 Castle Drive, Carnegie Campus, Dunfermline, Fife, KY11 8GG, or its predecessor, to consent to a discharge of trade effluent into the public sewers, and had received from them such Consent effective 14 (fourteenth) December 1998.

NOW THEREFORE, through the powers conferred on Scottish Water by the Sewerage (Scotland) Act 1968 and by any Act amending or replacing the same, Scottish Water HEREBY DIRECTS that the above mentioned Consent be reviewed by deletion of all the existing conditions of that Consent, and of any conditions imposed by any subsequent Directions, and replacement of these by the text that follows, with effect from 10 (tenth) October 2011, SUBJECT TO THE FOLLOWING CONDITIONS:
1. **Point of discharge**

The trade effluent shall be discharged into SW’s public foul or combined sewer (“the sewer”) only at the point indicated on the plan attached hereto. The written consent of SW must be obtained before any change is made to the location of this discharge point.

2. **Nature of discharge**

The trade effluent discharged shall consist solely of waste liquids arising from the process(es) listed:

**Salmon processing**

3. **Limits on volume, rate, discharge period, temperature and pH of the trade effluent**

3.1 The maximum volume of trade effluent discharged to the sewer in any one period of 24 hours shall not exceed twenty (20) cubic metres (m³).

3.2 The maximum rate at which trade effluent may be discharged shall not exceed one (1) litre per second (l/s).

3.3 The temperature of the trade effluent shall not exceed forty (40) degrees Celsius when measured at the inspection chamber specified in Clause 5.1.

3.4 The pH value of the trade effluent shall not be less than five (5) nor greater than eleven (11).

3.5 Trade effluent shall only be discharged during the following period(s):

**The daily period of working**

4. **Substances to be limited and prohibitions**

4.1 There shall be eliminated from the trade effluent before it enters the sewer any matter or constituent, which, either alone or in combination with any matter with which it is likely to come into contact while passing through any sewers, would be likely to injure or obstruct those sewers or make specially difficult or expensive the treatment or disposal of the sewage from those sewers, or be prejudicial to health.

4.2 Without prejudice to the foregoing generality of clause 4.1,

i) substances listed in Appendix I attached hereto shall not be permitted in the trade effluent at levels above their background concentration as defined in clause 4.3 below, and any additional concentration of such substances shall be **eliminated** from the trade effluent unless they are specifically authorised in section 4.3 below.

ii) no toxic or inhibitory substances shall be discharged other than those listed in clause 4.3 below, which may be discharged **only to the limits herein specified**.

4.3 **Substances to be limited in the Trade Effluent**:

<table>
<thead>
<tr>
<th>Substance</th>
<th>Limit</th>
<th>Unit</th>
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</thead>
<tbody>
<tr>
<td>Biochemical Oxygen Demand (Settled)</td>
<td>2000</td>
<td>mg/l</td>
</tr>
<tr>
<td>Biochemical Oxygen Demand Load (Settled)</td>
<td>25</td>
<td>kg/day</td>
</tr>
<tr>
<td>Chemical Oxygen Demand (Settled)</td>
<td>450</td>
<td>mg/l</td>
</tr>
<tr>
<td>Suspended Solids (Total)</td>
<td>1000</td>
<td>mg/l</td>
</tr>
<tr>
<td>Suspended Solids Load (Total)</td>
<td>15</td>
<td>kg/day</td>
</tr>
<tr>
<td>Solvent Extractate Material</td>
<td>400</td>
<td>mg/l</td>
</tr>
</tbody>
</table>

END OF LIST OF SUBSTANCES

Read the consent issued by Scottish Water in October 2011 in full [online here](#).
Discharge data from 2005 to 2014 provided by Scottish Water revealed 129 "failures" including 58 "serious parameter failures" (a 17.25% failure rate) - including an 80% failure rate for 'free oil and grease' - leading to an overall assessment of "Seriously Non-Compliant".

Read the Excel spreadsheet in full online here

In October 2013, Alan Kellock of Scottish Water emailed David Robinson of Wester Ross Fisheries:
In August 2012, Wester Ross Fisheries received a warning letter for "parameter failure" relating to "an illegal discharge":

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Dear Mr Robinson,

Trade Effluent Consent Reference 4213A

Warning Letter: Parameter Failure

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a parameter failure (see attached analysis report) and therefore the effluent constitutes an illegal discharge.

All actions necessary to return your discharge to compliance must be carried out within the shortest timescale possible.

Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

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In May 2012, Wester Ross Fisheries received a warning letter for a parameter failure and "illegal discharge":

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No worries we had a problem at the WWTP this afternoon with a strong fish processing influent effecting the Process, this problem has been traced to a spillage and overflow at another fish processor in Dingwall
Dear Mr Robinson,

**Trade Effluent Consent Reference 4213A**

**Warning Letter: Parameter Failure**

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a parameter failure (see attached analysis report) and therefore the effluent constitutes an illegal discharge.

All actions necessary to return your discharge to compliance must be carried out within the shortest timescale possible.

Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

Later in May 2012, Wester Ross Fisheries received a warning letter for a "serious parameter failure":

Dear Mr Robinson,

Trade Effluent Consent Reference: 4213A
Warning Letter: Serious Parameter Failure

I am formally writing to inform you of important compliance information relating to the above premises.

A recent sample taken of the trade effluent discharging from your premises had a serious parameter failure (see attached analysis report).

Please note that it is a criminal offence to breach the limits specified in a Consent.

All actions necessary to return your discharge to compliance must be carried out within the shortest timescale possible. Please supply a report detailing the actions to be taken, including the timescale, within 10 working days of this letter.

Should you fail to respond within the timescale, or undertake the necessary improvements timeously, we will have no option but to instigate further enforcement action, including formal sampling. Any additional costs incurred by Scottish Water as result of the discharge of this non-compliant effluent will be recovered.

Minutes of a meeting in May 2012 between Scottish Water and Wester Ross Fisheries reported that the Waste Water Treatment Plant at Dingwall "was still reporting fish scales entering the works on a regular basis":

Attn David Robinson
Wester Ross Fisheries
Taigh Na Braden
Strath View
Dingwall Business Park
Dingwall
IV15 9XD
In December 2011, Wester Ross Fisheries received a "Notification of Non-Compliance" for breaching total suspended solids:

**LP Failure Notification email Template**

**Reference:** TE/LET/33

**Version:** 1.0

**111207-4213A-LET**

**Notification of a Non Compliance**

**Attn David Robinson**

**Sample no. 5399408**

**Company name:** Wester Ross Fisheries

**SPID:** 101120400201

A parameter fail of a limit specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 1/12/2011

1388 mg/l Suspended Solids (Total) – The Consented limit is 1000 mg/l.
In December 2011, Wester Ross Fisheries received a "Notification of Non-Compliance" for breaching SEM and BOD:

111216-4213A-LET

Notification of a Non Compliance

Attn David Robinson

Sample no. 5399408

Company name: Wester Ross Fisheries
SPID: 101120400201

A parameter fail of a limit specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 1/12/2011

652mg/l SEM – The Consented limit is 400mg/l.
3017 mg/l BOD – The consent limit is 2000 mg/l

In November 2011, Wester Ross Fisheries received a "Notification of Non-Compliance" for breaching solvent extractable material (fats oils & greases):
In August 2011, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996:
Mr David Robinson  
Wester Ross Fisheries  
4 Strathview  
Dingwall Business Park  
Dingwall  
IV15 9XD

Please ask for: Clifford Smith  
Direct Dial: 01463 866489  
Email: env.health@highland.gov.uk  
Your ref:  
Our ref: CS/Food  
Date: 23rd August 2011

Dear Sir

FOOD SAFETY ACT 1990  
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006  
PREMISES: Wester Ross Fisheries Ltd, Dingwall.

I refer to the inspection of the above premises on 22nd July 2011.

The attached schedule details the outcome of the inspection. Any contraventions identified in the schedule require your immediate attention.

Should you disagree with the requirements of the enclosed Schedule you should make representation to Alistair Thomson, Head of Environmental Health and Trading Standards, within two weeks of receipt of this letter by writing to the address below or calling 01463 228700. The booklet "Food Law Inspections and Your Business" outlines your rights and is available from this office on request.

Publication of this report  
Please note that the attached schedule will be placed on the Highland Council’s public internet website (www.highland.gov.uk) within 14 days of the report being sent to you. This is in accordance with the Highland Council’s Publication Scheme to ensure compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

If you require any further information or advice please do not hesitate to contact me on the above number.

Yours faithfully

CLIFFORD SMITH  
Environmental Health Officer  
Transport, Environment and Community Services – Environmental Health
Read the correspondence with Highland Council in full online here.

In July 2011, SEPA reported that "odour issues" had been "ongoing for 6-8 years" with lorries "leaching contaminated water" which is "entering the drains and then running untreated into the River Peffrey":
Dingwall Business Park Odour Issues Meeting
6 July 2011
Hebrides, SEPA, Dingwall
10:00-11:00

Present:  
John Macdonald Unit Manager, SEPA (JM)
Lucy Gregson, EPO, SEPA (LG)
Alan Kellock, Scottish Water (AL)
Colin MacDonald, Edinburgh Smoked Salmon Company (CM)
David Robinson, Wester Ross Fisheries (DR)
Nick Thornton, Environmental health (NT)

Minutes:  
Kerry Lancaster, SEPA (KL)

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<th>ACTION</th>
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**Overview of Issues**

The issues relating to Dingwall Business park have been ongoing for 6-8 years and there are several issues that are believed to be causing the odour issues at the Dingwall Business Park:

1. Lorries are leaching contaminated water into the surface water drains. This is becoming concentrated due to the blocked drains then degrading causing the odour. The vehicles are being loaded outside company premises causing the leak of contaminated water from the Lorries into the drains instead of the company’s treatment system. This is an issue as trade effluent entering the drains and then running untreated into the River Pfeffrey is unacceptable and an illegal act as this is not a licensed process. Edinburgh Smoked Salmon Company have only been loading the truck outside the compound for the last 6-8 weeks and as of Monday 11 July all of their trucks will be filled within their compound. Wester Ross Fisheries are loading the trucks outside of the company compound as their yard is not large enough to take articulated lorries.

2. The buildings that are built on the park are all fitted with durgoo valves which trap the odour inside the building as they have no water vents. Therefore maintenance of the valves in the building may help relieve the issue.

3. The road gulleys along the business park need repaired/maintained as they are or have begun to collapse due to the volume of traffic. The drains need to be cleaned and then if there are other causes of the odour these can be pinpointed and then resolved.
Future Plans

Long term plans for the Fish factories are:

- Edinburgh Smoked Salmon Company is to extend their premises and include a specific entrance with drainage and its own treatment plant. The gutting will be self contained. They will find out if planning permission has been granted by the end of the month.
- Wester Ross Fisheries plans are to extend the premises so articulated lorries can be filled with their grounds, however no time line for this as yet.

Action Points

1. Wester Ross Fisheries and Edinburgh Smoked Salmon Company to overlook and review procedures to see how they can minimise the loss of contaminated water from the trucks.
2. Provide haulage details to LG for her to send a duty of care letter.
3. Find out who has ownership/responsibility of the roads is it the Highland Council?
4. LG to issue letter to Ian Haye (Roads and Transport Highland Council) regarding drain cleaning and gulley repairs, NT to receive a cc.
5. LG to inform CM/DR of when the drains are to be cleaned so they can arrange for staff to park elsewhere.
6. SEPA to contact their facilities department to ensure the Durgo valves are being maintained in order to minimise the odour inside the building.

Read document online via  SEPA 2011 Odour issues meeting

In May 2011, Wester Ross Fisheries received a "Notification of Significant Non-Compliance" for breaching the chemical oxygen demand limit by over two times:
In May 2011, Wester Ross Fisheries received a "Notification of Significant Non-Compliance" for breaching total suspended solids:


1433 mg/l Total Suspended Solids – The Consented limit is 1000 mg/l
In April 2011, Scottish Water issued a "Notification of a Significant Non Compliance" for a breach of chemical oxygen demand:

Notification of a Significant Non Compliance

Attn David Robinson

Company name: Wester Ross Fisheries
SPID: 101120400201


3140 mg/l Chemical Oxygen Demand – The Consented limit is 2000 mg/l

Minutes of a meeting in March 2011 between Scottish Water and Wester Ross Fisheries referred to an increase in the SEM parameter "and this would further help increase compliance":

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[ Santiago Water logo]

LP Failure Notification email Template

Date
Issued: TE/LET/33
Reference:
Version: 1.0
In 2010, minutes of a meeting between Scottish Water and Wester Ross Fisheries (13 January) recorded that compliance was only 41% with FOG (free oil and grease) at only 29% compliance. “Fish scales had been appearing in large quantities,” reported the minutes:

110317  Wester Ross Fisheries
Dingwall 4213A

Present Alan Kellock Scottish Water
David Robinson Wester Ross Fisheries

Compliance

Rolling 12 months compliance showed 87% overall compliance and 92% from installation of new balancing and screening set up (November 2011).

The current consent dated back to 2006 and was due to be reviewed, the new SEM method required that the SEM parameter should be increased and this would further help compliance.

DR would complete and submit a new form H

No short term future plans which would effect volume usage, but DR was currently looking for a source for the sludge accumulating in the new settlement tank.

In 2010, minutes of a meeting between Scottish Water and Wester Ross Fisheries (13 January) recorded that compliance was only 41% with FOG (free oil and grease) at only 29% compliance. "Fish scales had been appearing in large quantities," reported the minutes:
The next day (14 January 2010), Scottish Water wrote to Wester Ross Fisheries stating that they were "greatly concerned about the large quantities of fish scales appearing at the Dingwall Wastewater Treatment Plant". According to Scottish Water, the fish scales from the farmed salmon processing plant were "choking the inlet screens":

100113 Wester Ross Fisheries

Present Alan Kellock Scottish Water
David Robinson – MD Wester Ross Fisheries Limited

Compliance, 12 months figures showed 41% overall compliance, the worst parameters being FOG 29%.

WRF have been subject of a Trader Action Plan (TAP) to install a grease trap and suitable balancing tank screening system. The timescale for this was now March 2010.

DR stated that they had employed a consultant to scope the problem and deliver a solution by March 2010, but due to the overrun of his previous project he had been delayed.

AK stated that because this project had been delayed twice before there should be no slippage on time or enforcement action including formal samples would take place if the improvements were not made in the timescale.

Fish scales had been appearing in large quantities at the WWTP causing problems by blinding the screens and rotary lifts – photos shown of problem. AK said that sieve traps would be placed in the sewers adjacent to the outfalls of both salmon processors in Dingwall to find the source of the problem and it was likely that the clean up cost would be billed to any guilty parties.

DR thought that his current screening system was dealing with scales but he would check on its operation.
Dear Mr Robinson,

I refer to our meeting on 13th January 2010 at your premises and I am writing you to reiterate what was said. Scottish Water is greatly concerned about the large quantities of fish scales appearing at the Dingwall Wastewater Treatment Plant (WWTP). These are choking the inlet screens and blocking rotational screw pumps which have to be regularly dismantled to be cleaned. It is therefore vital that you check the screening system in your premises is working correctly and there is no route that fish scales and trimmings from your operation can get into the sewer network.

If the situation continues Scottish Water shall place sieve traps in the sewer discharges from the Salmon Processors in Dingwall to find the source of the scales and recharge the clean up costs incurred to any guilty parties.

Compliance of Consent conditions were currently at 41% overall and it was essential that the installation of a new balancing tank, grease removal system and sampling point should be completed within the timescale stated on the recent Trader Action Plan (March 2010). It was noted that any delay in timescale could result in formal sampling and legal enforcement action.

Wester Ross Fisheries claimed later that month (January 2010) that an upgrade to their effluent treatment would cost £84,000:
In January 2010, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996:
Dear Sir

FOOD SAFETY ACT 1990
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006
PREMISES: Wester Ross Fisheries Ltd, 4 Strathview, Dingwall.

I refer to the inspection of the above premises on 5th January 2010, and to my discussions with you at that time.

The attached schedule details the outcome of the inspection. Any contraventions identified in the schedule require your immediate attention.

Should you disagree with the requirements of the enclosed Schedule you should make representation to Alistair Thomson, Head of Environmental Health and Trading Standards, within two weeks of receipt of this letter by writing to the address below or calling 01463 228700. The booklet “Food Law Inspections and Your Business” outlines your rights and is available from this office on request.

Publication of this report
Please note that the attached schedule will be placed on the Highland Council’s public internet website (www.highland.gov.uk) within 14 days of the report being sent to you. This is in accordance with the Highland Council’s Publication Scheme to ensure compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.
Schedule

FOOD SAFETY ACT 1990
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006

Premises Name: Wester Ross Fisheries Ltd
Premises Address: 4 Strathview, Dingwall, IV15 9XD
Type of Premises: Manufacturer & Packer
Date and time of Inspection: 8th January 2010 at 12.15Hrs
Type of Inspection: Food Safety and Food Standards
Areas inspected: Factory, Stores and Yard
Records/Documents examined: HACCP, Labelling, Training and Past Control.
Samples Procured: Previous samples taken all satisfactory

Note
This schedule only covers the areas inspected as they were found at the time of the inspection. It should not be inferred that all hazards and defects within the premises have been identified. The responsibility for complying with legislation lies with the proprietor and your own checks should be carried out as a matter of routine.

This schedule contains contraventions. These are items that must be addressed to ensure your compliance with the above legislation. When considering work to deal with contraventions there may be other ways of achieving compliance with the law than those I have suggested. Alternatives may be used provided they are of equivalent effect. If you are in doubt as to the acceptability of alternatives please contact me.

Please note that Regulation 17 of the Food Hygiene (Scotland) Regulations 2006 makes it an offence to contravene or fail to comply with the requirements of EC Regulations 852/2004 and 853/2004. Regulation 4 of the General Food Regulations 2004 makes it an offence to contravene or fail to comply with the requirements of EC Regulations 178/2002.

Food Safety Contraventions

1. The brush strip at the Despatch Door of the factory was missing allowing pests access to the premises. The brush strip must be attached to the door to prevent access by pests. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d))
2. The cladding at the wash sinks is affected by corrosion. The wall cladding requires to be renewed or repaired and left in a sound, easy to clean condition. *(Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(b))*

3. The damaged light fitting above the gutting area cannot be adequately cleaned. You are required to repair or renew the light fitting to allow it to be thoroughly cleaned and where necessary disinfected. *(Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(b))*

4. The vacuum packs stored uncovered in the box store are open to contamination by condensation falling from the metal roof within the store. The pouches should be kept covered and where necessary sealed to protect the pouches from contamination. *(Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(a))*

Read the correspondence with Highland Council in full online here

In March 2010, Scottish Water issued a "Notification of Non Compliance" for a breach of chemical oxygen demand:
Notification of Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 16/3/2010 and SW has issued attached letter.

3840mg/l Chemical Oxygen Demand - The Consented limit is 2000mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

And in March 2010, Scottish Water issued a "Notification of Significant Non Compliance" for total suspended solids:
In May 2010, SEPA recorded an 'Environmental Event Report' following a complaint from a member of the public regarding "oil in gully pot" and a routine inspection which found "pools of blood on the road".

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 19/03/2010 and SW has issued attached letter.

2150 mg/l Total suspended solids –The consented limit is 1000mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser
SEPA Environmental Event Report

Event Number: ENV/0841207
Event Description: Dingwall Business Park, oil in gully pot on Strath View

Reported By
Surname
Forename
Organisation
Name
Address 1
Address 2
Address 3
Town
Post Code
Tel No
Fax No
Email Address

Origin
Public Complainant

Affected Medium
Land

Investigating Team
North Highland

Investigating Officer
John MacDonald(notification)

Receiving Officer
Rob Ebbins

Time Received
10:00:00

Date Received
27-MAY-10

Time Responded
10:00:00

Date Responded
27-MAY-10

Within 24?
Yes

Location
Gully pot @ Strath View, Dingw

Located Notifiers Address?
No

Date Event Occurred
27-MAY-10

Site Name
RSA Site?
No

Catchment

Mental H&S
Low

Assessment

Assessment Description

Impact
Category 4 - Other

Type
Oil / Fuel

Cause
Unknown

Sector
Sewage Treatment - Public

Source
Surface Water Drain

Sopa Activity
Controlled Activity Regulations (CAR)

Potential Hazard
Farm Name

Complainants Notified?

Details
read online via [SEPA Env Report 2010](#)

In August 2010, Scottish Water issued another "Notification of Significant Non-Compliance" for breaches of total suspended solids, chemical oxygen demand and biological oxygen demand:
In October 2010, Scottish Water issued another "Notification of Significant Non-Compliance" for breach of chemical oxygen demand:

Company name: Wester Ross Fisheries
SPID: 101120400201


2540 mg/l Total suspended solids – The consented limit is 1000mg/l
4500 mg/l Chemical Oxygen Demand – The consented limit is 2000 mg/l
2180 mg/l Biochemical Oxygen Demand – The consented limit is 2000 mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser
Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 12/10/2010

2630 mg/l Chemical Oxygen Demand – The Consented limit is 2000 mg/l

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

In October 2010, Scottish Water issued a warning letter for "Seriously Non-Compliant Effluent": 

Dear Sirs,

Trade Effluent Consent Reference: 4213A
Warning Letter: Seriously Non-Compliant Effluent

I am formally writing to inform you of important compliance information relating to the above premises.

A recent compliance evaluation has determined that the following breaches of consent have occurred over the last three months. As a result of these breaches of consent it has been determined that your company is now in serious non-compliance.

Please note that it is a criminal offence to breach the limits specified in a Consent.

In September 2010, minutes of a between Scottish Water and Wester Ross Fisheries reported that "removal of fish oil is difficult and a consent review allowing a higher parameter may be a more realistic option":
In 2008/9, compliance was 65% with only 17% compliance (i.e. 83% failure) for 'free grease & oil':
Read the report [online here](#).

In September 2009, Wester Ross Fisheries received a "Notification of a Significant Non-Compliance" for breaches of chemical oxygen demand and total suspended solids:
Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 29/9/09 and SW has issued attached letter.

2875mg/l Chemical Oxygen Demand - The Consented limit is 2000mg/l
1439 mg/l Total suspended solids – The consented limit is 1000mg/l

Please note that this sample will be included in the determination of wholesale billing strengths (St & Ot) for 2010/2011.

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser

And another "Significant Non-Compliance" for breaching total suspended solids by over two times the limit in January 2010:
In March 2009, Scottish Water sent a warning letter to Wester Ross Fisheries for a "Serious Parameter Failure":

Notification of a Significant Non Compliance

Company name: Wester Ross Fisheries
SPID: 101120400201

An exceedance of a limits specified in Trade Effluent Consent Reference 4213A occurred in a sample taken 26/01/2010 and SW has issued attached letter.

2355 mg/l Total suspended solids – The consented limit is 1000mg/l

Please note that this sample will be included in the determination of wholesale billing strengths (St & Ot) for 2010/2011.

Please contact me if you require further information.

Regards

Alan Kellock
Trade Effluent Adviser
In March 2009, Wester Ross Fisheries said that it would cost £15,000 to £20,000 for a new system to reduce the amount of free oils and grease (FOG) and that they would clean out the existing system:
Scottish Water
31, Henderson Drive
Longman Industrial Estate
Inverness
IV1 1TR

Dear Alan

I am writing in response to your letter indicating a parameter failure of our trade effluent.

We have been investigating ways of reducing the amount of free oils and grease (FOG) entering the effluent but as yet have not identified an affordable, reliable and cost effective system. We have had a quotation of £15,000 to 20,000 for a system similar to one installed locally; this cost includes the installation and frost protection required. As a small company in the present financial climate we will find it very difficult to finance the cost of this installation. I am however endeavouring to clean out our existing system in the hope that this may help to lower the amounts of FOG in our effluent levels, and this will be carried out as soon as a contractor can be found willing to carry out the work.

The next month (April 2009), Scottish Water reported that there were "FOG failures in 10/12 samples taken" (i.e. 83%):
Minutes of a meeting in April 2009, stated that 62% compliance was "unacceptable to Scottish Water". Wester Ross Fisheries was now looking to pump the effluent to the Edinburgh Smoked Salmon effluent plant around 100 metres away and was looking for a second hand "above ground grease traps".
0804 - to Wester Ross Fisheries

Present
David Robinson - Wester Ross Fisheries
Alan Kellock - Scottish Water

AK asked regarding the progress of the installation of the grease trap and detailed that compliance was at 62% overall which was unacceptable to SW.

The response letter of 26/4/09 had stated that they had not yet identified an affordable grease trap and were planning cleaning out the effluent sump to see if that improved performance. Cited the economic downturn as a reason for not affording grease trap quoted at £20k

DR - no progress had been made on the grease trap or cleaning out the sump as yet and was still looking at options including pumping the effluent to the Edinburgh Smoked salmon Effluent plant approx 100m away.

AK – emphasised the urgency that was required to remedy the situation and stated that a letter would be sent out with a TAP attached which would have to be responded to and action taken or formal sampling and a report to the PF would follow.

DR understood the seriousness of the situation and would discuss it at the WRF Board meeting tomorrow 17/4/09.

AK told DR to look at the market for second hand above ground grease traps as there had been one at Scotia Nutritional in Fort William prior to them closing.

Serious non compliance and TAP to be sent out 17/4/09

The subsequent warning letter in April 2009 from Scottish Water detailed "Seriously Non-Compliant Effluent":

The letter detailed a 20% compliance (i.e. 80% failure) rate for 'free oil and grease' (FOG):
In April 2009, SEPA recorded an 'Environmental Event Report' following a complaint from a member of the public detailing "fish waste discharged into River Peffery". SEPA visited the site and found "evidence of fish waste in the river" with "scales and fish guts evident from the surface water drain downstream" and "evidence of sewage fungus growing within the river":

Read the letter in full online here

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<thead>
<tr>
<th>Exceedance</th>
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<td>6</td>
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<tr>
<td>Serious parameter fails</td>
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<td>Total number of failures</td>
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<td>Percentage passed</td>
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<th>Chemical Oxygen</th>
<th>Free Oil and Grease</th>
<th>pH</th>
<th>PSEM</th>
<th>Suspended Solids</th>
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<td>Parameter fails</td>
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<tr>
<td>Serious parameter fails</td>
<td>2</td>
</tr>
<tr>
<td>Percentage passed</td>
<td>70 %</td>
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</table>
SEPA Environmental Event Report

Event Number: ENV/0832777
Event Description: Fish waste discharged to River Peffery. SW Service Request No. - 2599856 - CDR/EPJ/0004316/1

Reported By:
Surname
Forename
Organisation Name
Address 1
Address 2
Address 3
Town
Post Code
Tel No
Fax No
Email Address

Origin
Affected Medium: Inland Waters
Investigating Team: North Highland
Investigating Officer: John MacDonald (notification)

Public Complainant

Receiving Officer: Andrew Steel
Time Received: 15:55:00
Date Received: 27-APR-09

Time Responded: 16:20:00
Date Responded: 27-APR-09
Within 24? Yes

Location: SWO to River Peffery at Dingwall Business Park
Located Notifiers Address?: No

Date Event Occurred: 27-APR-09
Site Name: RSA Site?: No

Catchment: Cromarty Coastal
Mental H&S Assessment: Low
Assessment Description:

Impact: Category 3 - Minor
Type: Other
Cause: Unknown
Sector: Sewage Treatment - Private
Source: Other
Sepa Activity: Controlled Activity Regulations (CAR)
Potential Hazard: Farm Name

Complainants Notified?: Details: Complainant informed that the call had been forwarded to SW.
Read SEPA’s report online via SEPA Env Report 2009

In September 2009, Scottish Water threatened to send a report to the Procurator Fiscal following continued non-compliance:

SEPA Environmental Event Report

Action
Description

Complaint received via SCC of fish wastes being discharged into the surface water drains from the Dingwall Business Park at NH 536557.

AS and JK visited the site. Evidence of fish waste in the river. Scales and fish guts evident from the surface water drain downstream. Appeared to be some evidence of sewage fungus growing within the river. Colour of fish was noted.

Called Scottish Water to report the discharge as it is a Scottish Water surface drain. SW agreed to investigate the pipe network to trace the source. It was thought that the material originated from the fish processing factory which is present within the business park.

SW Service Request No. - 2566856
CDR/EPI/00043161

Complaint closed.
In January 2009, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996 by Wester Ross Fisheries:
Mr David Robinson
Wester Ross Fisheries
4 Strathview
Dirgwall Business Park
Dirgwall
IV15 9XD

Dear Sir

FOOD SAFETY ACT 1990
FOOD HYGIENE (SCOTLAND) REGULATIONS 2006
PREMISES: Wester Ross Fisheries, 4 Strathview, Dirgwall

I refer to the inspection of the above premises on 5th January 2009, and to my discussions with you at that time.

The attached schedule details the outcome of the inspection. Any contraventions identified in the schedule require your immediate attention.

Should you disagree with the requirements of the enclosed Schedule you should make representation to Alistair Thomson, Head of Environmental Health and Trading Standards, within two weeks of receipt of this letter by writing to the address below or calling 01463 228700. The booklet “Food Law Inspections and Your Business” outlines your rights and is available from this office on request.

Publication of this report
Please note that the attached schedule will be placed on the Highland Council’s public internet website (www.highland.gov.uk) within 14 days of the report being sent to you. This is in accordance with the Highland Council’s Publication Scheme to ensure compliance with the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.
In July 2008, Highland Council wrote to Wester Ross Fisheries reporting the following "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996 by Wester Ross Fisheries:

1. The brush strip at the Despatch Door of the factory was missing allowing pests access to the premises. The brush strip must be attached to the door to prevent access by pests. *(Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d))*

2. The cladding at the wash sinks is affected by corrosion. The wall cladding requires to be renewed or repaired and left in a sound, easy to clean condition. *(Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(b))*

3. The open metal support bars at the Access door within the factory are in a corroded state. The corroded supports are sealed and thereafter repaired, redecorated to provide them with surfaces which are smooth and non-absorbent and easy to clean. *(Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d))*

In July 2008, Highland Council wrote to Wester Ross Fisheries reporting the following "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996 by Wester Ross Fisheries:
Food Hygiene Contraventions

1. A flaking apron was noted in the production area. This damaged apron should be discarded. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(a))

2. A build-up of food debris was noted on the outside surfaces and buttons of the vacuum packing machine. The affected surfaces should be washed thoroughly and disinfected. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(a))

I would recommend that this specific item is included in your cleaning schedule.

3. The rusty bar above the external door in the production area requires to be stripped of any loose paint or rust and the affected areas should be resealed. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter II Paragraph 1(d))

4. ‘Ready to use’ plastic boxes were being stored uncovered outside. You must ensure that these boxes are stored covered in a hygienic manner to avoid their contamination. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter I Paragraph 2(c))

5. Some uncovered packaging materials were noted being stored outside the premises. All such materials must be stored covered and be protected from sources of contamination. (Regulation (EC) No 852/2004 Article 4(2) Annex II Chapter I Paragraph 2(c))

6. It is my understanding that the use of the external walkin chill is to be replaced with a permanent internal chill. Should you decide against this course of action, the damaged floor of your current walkin chill will require to be repaired. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter V Paragraph 1(b))

Read the correspondence with Highland Council in full online here

In 2008, Scottish Water sent a warning letter to Wester Ross Fisheries for "Non-Compliant Effluent": 

Transport, Environmental and Community Services
The Highland Council, Ross House, High Street, Dingwall, IV15 9QN
Tel: 01349 866613 Fax: 01349 866594 E-mail: env.health@highland.gov.uk
Scottish Water recommended that Wester Ross Fisheries install a grease trap:

![Scottish Water Form](image)

For attention Mr David Robinson

Dear Sirs,

**Trade Effluent Consent Reference 4213A**

**Warning Letter: Non-Compliant Effluent**

I am formally writing to inform you of important compliance information relating to the above premises.

A recent compliance evaluation has determined that the following breaches of consent have occurred over the last 12 months (see attached).

As a result of these breaches of consent it has been determined that your company is now in non-compliance.

These issues are of concern to SW because Fats Oils and Greases can cause chokes in the sewer network and pumping stations as well as blinding the screens at the local Wastewater Treatment Plant.

Please note that it is a criminal offence to breach the limits specified in a Consent.

Scottish Water recommended that Wester Ross Fisheries install a grease trap:

Read the warning letter (16 June 2008) online here
Wester Ross Fisheries replied later in 2008 that they "are encountering problems with our plan to install fat trap" and "will have to look at a much bigger trap":

From: David Robinson [david@wrs.co.uk]
To: Alan Keillock
Subject: Fat trap installation

Alan

We are encountering problems with our plan to install fat trap. It seems that we may not be able to install a simple version and will have to look at a much bigger trap involving considerable groundworks and possible re-location of our drumscreen. To compound the problem the company that installed our original system are not able to carry-out any work until next year. I am in the process of contacting a different company who have installed fat separation tanks and will keep you informed of progress.

regards

David

Wester Ross Fisheries Ltd
Taigh na Bradan
Dingwall Business Park
Dingwall, IV15 9XD

In 2008, Scottish Water referred to "ongoing odour issues" and "regularly breaching the consent parameter":

Wester Ross Fisheries 080610

Present Alan Kellock Scottish Water
David Robinson Wester Ross Fisheries

Details of the past 12 months compliance showed that the effluent has problems and was regularly breaching the 100mg/l consent parameter. With the previous blockages and ongoing odour issues in the business park it was seen as imperative that these failures were sorted out.

AK stated that an enforcement letter would be sent out detailing the problems and asking for a remedial timescale from WRF.

In 2007, Highland Council wrote to Wester Ross Fisheries reporting "contraventions" of the Food Safety Act 1990 and Food Hygiene (Scotland) Regulations 1996:
Read the FOI reply from Highland Council in full online here

In 2006, Scottish Water reported "a large amount of fish fins/parts of tails" entering the Wastewater Treatment Plant in Dingwall:

From: "Alan Kellock" <Alan.Kellock@scottishwater.co.uk>
To: wersprocessing@wers.co.uk
Sent: Monday, January 16, 2006 3:44 PM
Subject: Screening

For the attention of David Robinson

David,
I have received reports from the Wastewater Treatment Plant at Dingwall that a large amount of fish fins / parts of tails are entering the plant. Can you check that your screening system is working correctly, and get back to me.

Regards

Alan

In 2005, minutes of a meeting between Scottish Water and Wester Ross Salmon reported "high fat recordings":

Factory

2. The leaking knee operated tap serving the hand wash area in the factory requires to be repaired and thereafter maintained in a sound condition. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter I Paragraph 4)

Environmental Health Ross, Skye & Lochaber
Transport, Environmental and Community Services, Ross House, High Street, Dingwall, IV15 9QN
Tel: 01349 869613 Fax: 01349 869594 E-mail: env.health@highland.gov.uk

External Despatch Area

3. The gully at the Despatch Area apron was blocked. You must remove any blockage and repair any defects to ensure waste water can drain away effectively. (Regulation (EC) No 852/2004 Article 4(2), Annex II, Chapter I Para 1)

4. The damaged concrete joints at the apron of the factory at the external despatch area are causing water to pond which may contaminate the fish. The damaged joints require to be repaired to prevent the ponding of water at the site.
Appendix 1: Scottish Water FOI reply (27 February 2014)

Scottish Water supplied 55 documents:

| Contents folder | 02001998 | Analysis_2005_to_date.xls - analysis from 2005 onwards.

| 92_NONE          | 01012002 | For clarity, we no longer have copies of correspondence with the company prior to 21/10/2005 in electronic or handwritten form, other than the original documents from 1998.
|                  | 02122005 | Minutes of a meeting with the company.

| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
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| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
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| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.

| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.
| 0902104_14254_VIR.pdf | 01020200 | Email from SW to VIR.

In total, 55 documents were supplied to David Robinson WRS, A Kellock SW.

Sample issues – High fat recordings FOG Average >200mg/l up to max 953mg/l DW to look at installing some type of grease trap beyond drum screen.
Request for Information - E-mail 1 of 6
Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:59.

Sent: Thu 27/02/2014 08:54
To: Don Stanford

Analysis & Consent

Privileged/Confidential information may be contained in this Email and any files transmitted with it. If you are not the intended recipient you should not retain, copy or use this Email for any purpose or disclose all or part of its contents to any person. If you have received this Email in error please notify the postmaster and delete this Email from your system.

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Scottish Water
www.scottishwater.co.uk
www.scottishwatersolutions.co.uk
postmaster@scottishwater.co.uk

Request for Information - E-mail 2 of 6
Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:59.

Sent: Thu 27/02/2014 09:01
To: Don Stanford

090407-4213A-EMAIL-ATTACHMENT.pdf (679 KB) 051921-4213A-MIN.pdf (328 KB)
060119-4213A-EMAIL.pdf (743 KB) 060419-4213A-EMAIL.pdf (665 KB)
080610-4213A-AGENDA.pdf (132 KB) 080610-4213A-MIN.pdf (254 KB)
080308-4213A-LET.pdf (640 KB) 080822-4213A-EMAIL.pdf (883 KB)
090313-4213A-LET.pdf (1 MB) 090926-4213A-LET.pdf (661 KB)
090407-4213A-EMAIL.pdf (525 KB)

Dear Mr Stanford,

The List.xls attachment in my last e-mail is the file that details what is in the other attachments that are about to be sent.

Many thanks

Richard

Request for Information - E-mail 3 of 6
Richard Duncan [Richard.Duncan@SCOTTISHWATER.CO.UK] on behalf of FOI [FOI@scottishwater.co.uk]

You forwarded this message on 27/02/2014 13:59.

Sent: Thu 27/02/2014 09:03
To: Don Stanford

091214-4213A-TAP.pdf (725 KB) 090416-4213A-MIN.pdf (173 KB)
090417-4213A-LET.pdf (3 MB) 090430-4213A-TAP.pdf (914 KB)
090508-4213A-LET.pdf (22 KB) 090914-4213A-LET.pdf (3 MB)
090814-4213A-MIN.pdf (9 KB) 090925-4213A-LET.pdf (51 KB)
091120-4213A-EMAIL.pdf (335 KB) 091203-4213A-LET.pdf (24 KB)
Dear Mr Staniford,

Thank you for your request for information. I have been asked to provide some information to you and would be grateful if you could respond.

This company has had a consent to discharge effluent to sewer since at least 1998 when it was consented by NoSWA.

The consent and subsequent amendments to it would contain limits for volume, flow and normal sanitary determinands such as pH, suspended solids, biochemical and chemical
oxygen demand and fats/oils, but we would never have restricted or monitored for the
discharge of sea lice or their eggs. All analytical information would relate the parameters
contained in the consent.

Scottish Water would not monitor environmental health issues as these are the responsibility
of the local council's Environmental Health department.

Inspection reports would relate to the sample point - assessing it from a safety point of view.

Any pollution incident reports would relate to breaches of the limits contained in the consent.

Scottish Water doesn't monitor for sea lice or infectious diseases in an effluent monitoring
programme.

I would be grateful if you could advise if you still require all the information requested in
view of the above and if so, I will arrange for the information to be collated and sent to you.

Yours sincerely,

Richard Duncan
FOI Analyst
Customer Experience Reporting

Telephone: 07443 876 049
E-mail: FOI@scottishwater.co.uk
Web: www.scottishwater.co.uk

Scottish Water
Always Serving Scotland

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From: Richard Duncan [mailto:Richard.Duncan@SCOTTISHWATER.CO.UK] On Behalf Of FOI
Sent: 12 February 2014 10:23
To: Don Staniford
Subject: RE: FOI on Wester Ross Fisheries processing plant in Dingwall - Our Reference: 4765766

Dear Mr Staniford,

Thank you for your request for information.

I will provide you with a response by 12 March at the very latest but if I get all the
information before this time, I will respond quicker.

Yours sincerely,
Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002.

The following is an extract from a signed testimony recently divulged by a former employee at the Wester Ross facility:

**OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.**

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:

- Initially the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was where the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.
Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall.

Please include any letters and emails to and from Wester Ross Fisheries/Salmon.

Does Scottish Water monitoring for sea lice or infectious diseases in any effluent monitoring programme?

Please note a recent scientific paper:

UNIVERSITY OF VICTORIA, 19 DECEMBER 2013

FISH FARMS POSE BIOSECURITY RISK, SAYS NEW STUDY

Live fish pathogens are being transmitted from farmed salmon processing facilities into the marine waters of Canada’s Pacific coast, a new study has confirmed.

Researchers at the University of Victoria say their peer-reviewed study titled “Fish processing facilities: new challenge to marine biosecurity in Canada,” published recently in the Journal of Aquatic Animal Health, shows that fish farms pose a marine biosecurity risk for Canada and that better guidelines and monitoring of fish farms by the Canadian government are needed.

Salmon farms routinely experience outbreaks of sea lice, and juvenile wild salmon swimming past farms are often infected with sea lice. However, this is the first time that a processing facility for farmed salmon has been identified as a source of sea lice.

In this study, the authors recovered hundreds of live lice and eggs directly from the effluent of a facility that processes Atlantic salmon on Vancouver Island’s east coast. The study site supports several wild salmon populations, including Canada’s largest annual migration of juvenile sockeye salmon.

“Sea lice and other disease vectors transmitted from facilities processing farmed fish from across the province may pose a threat to wild salmon populations,” says UVic marine ecologist Dr. John Volpe, a co-author of the paper. “Our study demonstrates that disease transmission is possible from farmed fish to wild fish through the tissue, blood and mucus released in untreated farmed salmon offal.

“If live sea lice eggs are pouring out of farmed salmon processing plants, it is likely that infectious bacteria and viruses are as well,” says Volpe, adding that more research is needed to determine the extent of sea lice release and whether more virulent fish pathogens are present in fish farm effluent.

The other authors of the paper were UVic biologist Michael Price, Raincoast Research Society biologist Alexandra Morton, and J.G. Eriksson with Sonora Marine Services.

–30–
Copies of the paper are available at 
http://www.tandfonline.com/toc/uahh20/current#.UrMsSY3kDnc

Media Contacts:

Dr. John Volpe (School of Environmental Studies) at 250-888-7711 (cell) or jpv@uvic.ca
Alexandra Morton (Raincoast Research Society) at 250-974-7086 or gorbuscha@gmail.com
Anne MacLaurin (Social Sciences Communications) at 250-217-4259 (cell) or sosccomm@uvic.ca

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http://communications.uvic.ca/releases/tip.php?date=19122013#1534

Please also note that carbon copy FOI requests were made to SEPA and Highland Council - SEPA’s FOI reply yesterday (see attached) included:

Under SEPA’s duty to advise and assist under the terms of The Environmental Information (Scotland) Regulations 2004 regulation 9, please note the Wester Ross Fisheries processing plant in Dingwall has a discharge to the local sewer, and as such Scottish Water is the body who regulate this discharge.

Hence this FOI request to Scottish Water.

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Don

Don Staniford

Director, Protect Wild Scotland: www.protectwildscotland.org
From: AccessstoInformation [mailto:foi@sepa.org.uk]
Sent: 11 February 2014 15:41
To: director@protectwildscotland.org
Subject: SEPA ACCESS TO INFORMATION ENQUIRY - F0184379

Dear Mr Staniford

REQUEST FOR INFORMATION

Please see the attached response for your request for information.

Regards

Michael Hampton
SEPA Access to Information Team
Email: foi@sepa.org.uk
Tel: 01786 457700

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk
SEPA principal office: Erskine Court, Castle Business Park, Stirling, FK9 4TR. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

From: Don Staniford [mailto:director@protectwildscotland.org]
Sent: 24 January 2014 20:34
To: 'AccessstoInformation'
Subject: FOI on Wester Ross Fisheries processing plant in Dingwall

Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002.

The following is an extract from a signed testimony recently divulged by a former employee at the Wester Ross facility:
Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall.

Please include any letters and emails to and from Wester Ross Fisheries/Salmon.

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Don
Appendix 2: Highland Council FOI reply (13 February 2014):

Read the FOI reply from Highland Council in full [online here](mailto:noreply@highland.gov.uk).

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From: noreply@highland.gov.uk
Sent: 28 January 2014 10:19
To: director@protectwildscotland.org
Subject: EIR Request 788047

EIR Request 788047

Dear Mr Staniford,

We acknowledge receipt of your request for information under the Freedom of Information Act / Environmental Information Regulations received on 28/01/2014.
The Highland Council will endeavour to respond within the legislative time scale of 20 working days from date of receipt unless further clarification of your request is required.

Further information on response times can be found at:
www.itspublicknowledge.info/YourRights/HowlongwillIwait.asp

Yours Sincerely,

The Highland Council

From: Don Staniford [mailto:director@protectwildscotland.org]
Sent: 24 January 2014 20:34
To: 'Freedom of Information'
Subject: FOI on Wester Ross Fisheries processing plant in Dingwall

Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002.

The following is an extract from a signed testimony recently divulged by a former employee at the Wester Ross facility:

**OBSERVATIONS MADE WHILE WORKING IN THE WESTER ROSS SALMON PROCESSING FACILITY AT DINGWALL.**

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:-

Firstly the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was were the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.
Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall.

Please include any letters and emails to and from Wester Ross Fisheries/Salmon.

Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Don

Don Staniford

Director, Protect Wild Scotland: www.protectwildscotland.org

Appendix 3: Scottish Environment Protection Agency FOI reply (11 February 2014):

Read SEPA's FOI reply letter online here

Includes:
SEPA hold no information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports and testing in relation to the Wester Ross Fisheries processing plant in Dingwall. This information is excepted under Regulation 10(4)(a) of the Environmental Information Regulations 2004.

Under SEPA’s duty to advise and assist under the terms of The Environmental Information (Scotland) Regulations 2004 regulation 9, please note the Wester Ross Fisheries processing plant in Dingwall has a discharge to the local sewer, and as such Scottish Water is the body who regulate this discharge.

As confirmed above SEPA does not hold this information on effluent monitoring, in accordance with Regulation 14(1)(b) of the Environmental Information (Scotland) Regulations 2004, we advise you to contact Scottish Water directly who may hold this information. The text of Regulation 14(1)(b) is reproduced below:

(1) Where a Scottish public authority has received a request to make environmental information available and does not hold that information but believes that another public authority holds the information requested then it shall:- (b) supply the applicant with the name and address of that other authority,

In accordance with the above, please note that the contact details for Scottish Water can be located in the link below.

http://www.scottishwater.co.uk/about-us/freedom-of-information/freedom-of-information

Read the FOI documents via:

SEPA 2011 Odour issues meeting
SEPA Env Report 2010
SEPA Env Report 2009

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SEPA ACCESS TO INFORMATION ENQUIRY - F0184379

Access to information [foi@sepa.org.uk]

You replied on 12/02/2014 09:21.

Sent: Tue 11/02/2014 15:41

To: director@protectwilderseascotland.org

Message

PDF: F0184379 Response 126P.pdf (120 KB)
PDF: ENV0532777_Redacted.pdf (5 KB)
PDF: ENV0541207_Redacted.pdf (6 KB)
PDF: Minutes1.pdf (23 KB)

Dear Mr Stanford

REQUEST FOR INFORMATION

Please see the attached response for your request for information.

Regards

Michael Hampton

SEPA Access to Information Team
Email: foi@sepa.org.uk
Tel: 01786 457700

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipient. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk

SEPA principal office: Erskine Court, Castle Business Park, Stirling, FK9 4TR. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.
Dear Mr Staniford

REQUEST FOR INFORMATION - ACKNOWLEDGEMENT

I am writing to acknowledge receipt of your email, received by SEPA on 24/01/2014, in which you asked for the following information:

"Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002. Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall. Please include any letters and emails to and from Wester Ross Fisheries/Salmon."

We must respond to your request within a 20 working day timeframe. This means that we will issue you with a response by 24/02/2014 at the latest.

Your unique reference number is F0184379. Please quote this in any future contact with us about your request.

This acknowledgement has been sent electronically to director@protectwildscotland.org. If you would like a hard copy signed letter please do not hesitate to contact us.

If you have any queries in the meantime please contact us.

Yours sincerely

Michael Hampton
SEPA Access to Information team

Email: foi@sepa.org.uk
Tel: 01786 457700

The information contained in this email and any attachments may be confidential and is intended solely for the use of the intended recipients. Access, copying or re-use of the information in it by any other is not authorised. If you are not the intended recipient please notify us immediately by return email to postmaster@sepa.org.uk

SEPA principal office: Erskine Court, Castle Business Park, Stirling, FK9 4TR. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.
Please provide information on sea lice disposal, water pollution incidents, environmental health violations and effluent monitoring at the Wester Ross Fisheries processing plant in Dingwall since 2002.

The following is an extract from a signed testimony recently divulged by a former employee at the Wester Ross facility:

**Observations Made While Working in the Wester Ross Salmon Processing Facility at Dingwall.**

Approximately 2002 I was employed for some six months in the above facility. The main part of the industry was in preparing salmon carcasses for export and to achieve this, a straightforward production line ethos was employed.

Fish harvested in daylight hours at Ardmair would arrive at Dingwall late evening and were offloaded in large plastic containers from a truck which would re-load with empty containers. The containers full of fish were then loaded by fork-lift truck into the processing plant where they would be met by the following staff:-

Firstly the Gutters four to six in number would deftly gut and scrape the fish then the fish would be thrown down into a long stainless steel channel where they received the attention of the Scrubbers. The scrubbers numbering ten to fifteen, each armed with a stiff bristle brush to which was attached a hosepipe would then scrub the carcasses clear of Sea Lice. Particular attention was paid to the gill areas of the carcass as this was where the heaviest infestation of lice was frequently found. Fish showing serious dermal abrasions were sidelined and if I remember correctly, would be re-routed to a smoke-house. After gutting and cleaning, the fish were weighed individually and segregated, the activity of one person. Weighed fish were then placed in Styrofoam boxes, weighed, labelled, ice added and the box closed and banded; the efforts of two persons being required before being placed in cold storage by the fork lift driver. One supervisor overseeing all.

As you can see from the foregoing, at least fifty percent of the workforce was employed in cleaning the fish.

Other persons known to me who have been employed in the industry by other firms, all have the same experience.

Please therefore include any information relating to the disposal of sea lice, effluent monitoring results, environmental health issues, inspection reports, testing and pollution issues at the Wester Ross Fisheries processing plant in Dingwall.

Please include any letters and emails to and from Wester Ross Fisheries/Salmon.
Please consider this a request for information under the relevant Freedom of Information and Environmental Information Regulations including both the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004 (as well as any other new or other regulations which may be appropriate).

Please provide this information electronically via email.

Please acknowledge receipt of this FOI request.

Many thanks and I look forward to a response shortly.

Don

Don Staniford

Director, Protect Wild Scotland: www.protectwildscotland.org

Read more online here