

From: [Redacted] SG staff

Sent: 22 November 2019 13:19

To: [Redacted] SG staff

Cc: Palmer MR (Mike) <Mike.Palmer@gov.scot>; [Redacted]<[Redacted]@scotland.gsi.gov.uk>

Subject: RE: Briefing and Itinerary - Mr Ewing's visit to Norway 24-26 November



Updated OVA
briefing.docx

Hey [Redacted]

Please find attached updated briefing so insert into the pack.

Grateful if you could provide the below text in response;

The ova annex has been updated to include additional background information on the reasons for the suspension and include further details on why the suspension has not yet been lifted. I've also increased information under stakeholder views which explains the industries current position.

In very short summary, there were some serious short falls found with regard to Norway's ability to provide assurance that the compartments they are trading from are free from infectious salmon anaemia. The suspension was recommended until Norway could put forward a justifiable list of ISA free compartments. That process has been delayed on two occasions. The NFSA was due to submit their suggest list to EFTA on 1 November. They did not meet this deadline and we have just had feedback from the Commission that they are still working to bring together documentation. We should press that this list is finalised urgently and shared with us when it is submitted. The suspension will not be lifted until the list is provided to EFTA and they are satisfied Norway can assure that they are free from ISA.

We cannot accept exports from Norway until authorities are able to attest to ISA disease freedom. That process is for Norway and EFTA. For our part, we must apply the pressure that we can to ensure that the situation is resolved as quickly as is possible, whilst respecting that trade can only take place on the basis of assurance of ISA freedom.

The industry accepts that regulatory short comings in Norway have been exposed and that the ban is in place in order to protect the interests of trading partners and Scotland's ISA free disease status. For minimal impact, the industry would like to see the ban lifted by January at the latest. If the Norwegian Minister suggests that this date will not be met, we will engage in further contingency planning discussions with industry in order to reopen previously used broodstock sites, which would allow the stripping of fish in Scotland and create an alternative ova supply.

[Redacted]
[Redacted]

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[Email redacted – out of scope]

From: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>
Date: Friday, 22 Nov 2019, 11:40 am
To: [Redacted]@gov.scot
Cc: [Redacted]@gov.scot, Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>, [Redacted] Mike.Palmer@gov.scot, [Redacted], Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>
Subject: RE: Briefing and Itinerary - Mr Ewing's visit to Norway 24-26 November

[Redacted],

Mr Ewing has had sight of the briefing and is keen to understand issues surrounding OVA and the reasons why Norwegian authorities have not lifted the suspension.

Furthermore, the Cab Sec is eager to ensure our lines and approach is aligned with industry and that we fully understand problems and have a plan on how to arrive at solutions, noting that we have to be able to argue that our representations have actually assisted the industry in this case.

Grateful if briefing could reflect the above.

Thanks,
[Redacted]

[Redacted]
Cabinet Secretary for the Rural Economy
CabSecRE@gov.scot
0131 24 [Redacted]

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[Email redacted – out of scope]

From: [Redacted]@gov.scot
Sent: 06 November 2019 22:28
To: [Redacted]@scottishsalmon.co.uk; [Redacted]@scottishsalmon.co.uk
Subject: OVA - for producers

Hi [Redacted]

We discussed the current suspension of ova exports at the Framework meeting yesterday. Obviously SSF, Mowi and SSC are up to date from Framework meetings, but could you please circulate to all so everyone is clear on the current picture?

Message from Scottish Government Aquaculture Policy Unit;

A meeting of the EU's Standing Committee on Plants, Animals, Food and Feed took place on 24 October. One of the agenda items was the temporary suspension of ova exports from Norway in relation to ISA certification;

- Norway confirmed that it is still working towards a deadline of 1 November to provide documents to EFTA for review and to re-establish a list of ISA free compartments. They have confirmed that they will not resume exports without positive feedback from EFTA.
- EFTA confirmed that it will review documents submitted in cooperation with Commission services. EFTA have planned a follow up mission in 2020 to ensure that guarantees have been fulfilled by Norway.
- The suggested ISA disease free compartment list will be shared with the Commission when documents are submitted to EFTA.
- Member States wish to discuss the topic at the next ScoPAFF meeting scheduled for 21-22 November.
- The Commission requested that Norway keeps it updated with any plans to resume trade and to confirm that it will not resume certification before the next committee meeting.

This means that **certification will not resume until 21/22 November at the earliest**, pending acceptance of each ISA free area put forward and its related documentation. There is the potential for further delay.

Please get in touch with either myself or [Redacted] to discuss any concerns. As of today, we have not yet been sighted on the list to be put forward by the NFSA. I will provide any further updates that I can.

Best regards

[Redacted]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

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From: [Redacted]@gov.scot

Sent: 06 November 2019 21:33

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>

Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>; Palmer MR (Mike)

<Mike.Palmer@gov.scot>; [Redacted]@gov.scot>; Voas S (Sheila)

<Sheila.Voas@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot> [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>; Black G (Graham)

<Graham.Black@gov.scot>; Director of Marine Scotland Mailbox

<Directormarinescotland@gov.scot>; [Redacted]@scotland.gsi.gov.uk>; Mcdonnell

T (Tim) <Tim.Mcdonnell@gov.scot>; Moffat C (Colin) (MARLAB)

<Colin.Moffat@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: 6 November update - OVA - RE: Update - To note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY - Aquaculture

PS Cabinet Secretary for the Rural Economy

Mr Ewing will wish to be aware that a meeting of the Farmed Fish Health Steering Group took place yesterday. The industry remain concerned about the further delay to the resumption of ova exports from Norway. [Redacted] (Mowi) and [Redacted] (Scottish Sea Farms) expect that they can source stock from elsewhere until the end of the year, but may face ova sourcing problems in Q1 in 2020 if the situation is not resolved. The SSPO were also present at the meeting and we will pass a further update to them to distribute to their membership to ensure that all producers are up to date with the situation as it changes.

Scottish Sea Farms will hold contingency planning discussions with Scottish Government's Fish Health Inspectorate around the potential use of authorised broodstock sites in Scotland to source stock for the production of additional ova in Scotland next year if required.

[Redacted]

[Redacted – one sentence withheld under regulation 10(4)(e) internal communications]

Kind regards

[Redacted]

Cabinet Secretary for the Rural Economy

2N.08

St Andrews House

(0131 244 [Redacted])

([Redacted])

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[Email redacted – out of scope]

From: [Redacted]@gov.scot

Sent: 29 October 2019 11:58

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>

Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>; Palmer MR (Mike)

<Mike.Palmer@gov.scot>; [Redacted]@gov.scot; [Redacted]@gov.scot;

[Redacted]gov.scot; [Redacted]@gov.scot; [Redacted]gov.scot;

[Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;

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[Redacted]scotland.gsi.gov.uk; McDonnell T (Tim) <Tim.Mcdonnell@gov.scot>;

Moffat C (Colin) (MARLAB) <Colin.Moffat@gov.scot>

Subject: RE: Update - To note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY - Aquaculture

PS Cabinet Secretary for Rural Economy

Please find attached the read out from 24th October's Standing Committee on Plants, Animals, Food and Feed meeting relating to the temporary suspension of ova exports from Norway. We will get a further report from Defra in the coming days, although this is unlikely to provide much further information.

In summary;

- Norway confirmed that it is still working towards a deadline of 1 November to provide documents to EFTA for review and to re-establish a list of ISA free compartments. They have confirmed that they will not resume exports without positive feedback from EFTA.
- EFTA confirmed that it will review documents submitted in cooperation with Commission services. EFTA have planned a follow up mission in 2020 to ensure that guarantees have been fulfilled by Norway.
- The suggested ISA disease free compartment list will be shared with the Commission when documents are submitted to EFTA.
- Member States wish to discuss the topic at the next ScoPAFF meeting scheduled for 21-22 November.
- The Commission requested that Norway keeps the Commission updated with any plans to resume trade and to confirm that it will not resume certification before the next committee meeting.

There is no confirmation that Norway accepted the Commission's request. However, working on the assumption that it was accepted, this means that **certification will not resume until 21/22 November at the earliest**, pending acceptance of each ISA free area put forward and its related documentation.

Yesterday at a subgroup meeting of the Farmed Fish Health Framework industry members expressed concern that there was to be a further delay. A meeting of the Farmed Fish Health Framework Steering Group will take place on 5 November. We will table the suspension as an agenda item and further discuss the suspension with industry members, including Ben Hadfield Mowi MD and Jim Gallagher, Scottish Seafarms MD.

I will provide a further update to Ministers on 5 November.

Best regards



Readout Item
AHW.A.06 - SCoPAFF

[Redacted]

[Redacted]

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We have been informed that the EFTA audit and Norwegian export suspension will be discussed at the EU's Standing Committee on Plans, Animals, Food and Feed meeting on 24th October. Defra officials have confirmed attendance and will provide feedback following the meeting, including any actions or decisions taken.

Risks and Stakeholder Views

Scottish salmon production is heavily reliant upon the import of Norwegian ova ~ 90% of ova imports come from Norway. We have been in discussion with industry contacts in Norway and with the Scottish Salmon Producers' Organisation to discuss potential impacts. Relatively few queries have been received by Scottish Government and the SSPO regarding the suspension. This suggests that commercial discussions between producers and suppliers have been positive or reassuring. The Fish Health Inspectorate has noted an increased in imports from Iceland and some resilience may also exist within Scottish supplies – for example the new AquaGEN facility which has been established in Dumfries and Galloway. The SSPO has been asked to inform us if any of its members report concerns.

Rigorous application of European aquatic animal health law is essential in order to evidence and maintain disease free status and support trade. The surveillance programme implemented by Scottish Government's Fish Health Inspectorate protects Scotland's high health status. The Marine Scotland aquatic animal health programme will continue to be vital if the UK leaves the European Union.

I will provide a further update following feedback from the meeting on 24th October.

Best regards

[Redacted]

[Redacted]

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From: [Redacted]@gov.scot>

Sent: 14 October 2019 10:15

To: [Redacted] <[Redacted]@gov.scot; [Redacted]@gov.scot;

[Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;

[Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@scotland.gsi.gov.uk

Subject: RE: NSFA - ISA free - ova suspension



Norwegian imports
2018 2019.xlsx

Hi [Redacted]

I've attached a summary of the 2018 and 2019 imports from Norway to date.

In 2018 we imported 48 million salmon ova (41 consignments) from Norway and nearly 24 million this year (21 consignments). The number each year has varied, but I would expect a further 15-20 million to be imported during the remainder of this year as we come into ova season. Since the hold was put in place on exports from Norway this summer, the Scottish industry has been supplied with salmon ova from Stofnfiskur in Iceland (over 5.6 million).

We receive ova from a few different sources and the suppliers are Mowi Norway (Tveitavag), Aquagen (Rimstad), Salmobreed, Grieg Seafood Rogaland (Erfjord Stamfisk) and AS Bolaks (Eikelandssosen and Nordveitgrend). I think there have been some changes in who owns sites as exports from Erfjord Stamfisk now have Grieg as consignor rather than Salmobreed. As there is no definitive list of ISA compartments in Norway it is hard to keep track of operator and site names.

I haven't had any discussions with industry about the situation in Norway apart from a general chat with [Redacted] at Benchmark. Benchmark own Stofnfiskur and Salmobreed so I expect that they have a contingency plan in place to import ova from Stofnfiskur instead of Salmobreed if required. I'm surprised, but I think industry are being told that this will be resolved in time for ova season.

Speak with you later

[Redacted]

From: [Redacted]@gov.scot

Sent: 11 October 2019 15:07

To: [Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;

[Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;

[Redacted]@gov.scot; [Redacted]@scotland.gsi.gov.uk

Subject: RE: NSFA - ISA free - ova suspension

CC. [Redacted]. Sorry – missed you off the original copy list.

Thanks [Redacted]. I'll need to provide an update to Ministers in due course so I will make sure this is reflected in any submission. I've queried with Defra whether there will be attendance at ScoPAFF, I suspect not given they've pulled out of the majority of EU meetings.

[Redacted], would it be easy enough for you to provide information on area/ ova imports / number of imports from Norway (I think you keep a movement spreadsheet out with TRACES?)?

Best regards

[Redacted]

[Redacted]

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From: [Redacted]@gov.scot

Sent: 11 October 2019 14:50

To: [Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;
[Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;
[Redacted]@gov.scot

Subject: RE: NSFA - ISA free - ova suspension

Hi All

Yet another nightmare scenario and example of why we are rigorous in our implementation of the regulations and adherence to surveillance and control requirements to evidence and maintain disease status. Well done to policy and science colleagues.

[Redacted – out of scope]

Regards

[Redacted]

From: [Redacted]@gov.scot

Sent: 11 October 2019 11:31

To: [Redacted]gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;
[Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot;
[Redacted]@gov.scot

Subject: FW: NSFA - ISA free - ova suspension

Hi All

For info and to discuss. [Redacted – out of scope]

Best regards

[REDACTED]

[Redacted]

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From: [Redacted]@gov.scot

Sent: 11 October 2019 11:08

To: nina.santi@aquagen.no

Subject: RE: NSFA - ISA free - ova suspension

Dear Nina

Thank you for this detailed and comprehensive reply. This is more information that we have had previously. The latest information I have from the Norwegian Food Safety Authority is that they have completed the review of all existing ISA free compartments, including surveillance, biosecurity and fish movements, as well as the need of extra measures to safeguard category I for ISA and will soon conclude on the list of sites which they will put forward to open for trade. This suggests to me that this will not be a like for like list, and your email confirms this. This will obviously then be for discussion with EFTA/ ESA and we can't assume what that outcome will be. However the current expectation is that the plan put in place by NFSA will allow the lifting of restrictions on 1 November.

The member state of the UK is usually represented by the Department for Environment, Food and Rural Affairs (DEFRA) at ScoPAFF meetings. I will query whether representation will be sent to this month's aquatics meeting and request feedback [DEFRA have pulled out of some EU commitments due to the potential departure of the UK from the European Union at the end of the month].

Would it be possible to share your email with the Scottish Salmon Producers' Organisation? I understand that you only have certain customers/ contracts in Scotland, so you may not wish me to do this, however it is a very useful summary of current state of play.

[Redacted – out of scope]

Best regards

[REDACTED]

[Redacted]

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From: nina.santi@aquagen.no
Sent: 10 October 2019 13:15
To: [Redacted]@gov.scot
Subject: SV: NSFA - ISA free - ova suspension

Dear [Redacted]

Sorry for the late reply – I was hoping to gather more information and preferentially with a more optimistic content.

A brief summary of the situation:

In the days of the 20-29th May 2019 there was an EFSA audit in Norway, to evaluate animal health control. The EFSA had some serious findings during this audit related to the ISA-free compartments and recommended a temporary stop in the export of eggs from Norway. I have attached the final report from the 23rd September 2019 to this mail. It should be noted, when reading this report, that despite of some of the critics and comments, this does not translate into any direct risk of transferring ISA.

The most serious issue in the report was that the Food Safety Authority (NFSA) in Norway could not show a reliable and definite list of ISA-free compartments and zones publicly available for Norway. This is of course unacceptable and have to be corrected immediately.

One of the other issues addressed is how the NFSA have organized the sampling routines. NFSA have emphasized a risk based sampling of mortalities performed by a combination of the site's own staff, qualified fish health services and NFSA employees. In EFSA's opinion the use of own staff compromise the reliability of the targeted surveillance due to conflict of interest. As a veterinarian I would argue that the chance of detecting disease is much higher if you sample from mortalities over an extended period, but the EFSA would rather have samplings from alive fish over a short period with the NFSA present at the sampling. This reflects that the interpretation of the regulations are different between the two bodies. Neither the NFSA or the industry will object to change this, and the change is already implemented (by September 2019).

Another issue was the declaration of dependent compartments – this is compartments that have a higher risk of infection from surrounding waters; like sea sites. In the existing regulation and on the time of the establishment of some of the existing compartments (2008-2009) there were no clear requirements of additional measures other than this paragraph: *Point 2.4 of Part II Annex V to Directive 2006/88/EC - Each farm or mollusc farming area in a compartment shall be subject to additional measures imposed by the competent authority, when considered*

necessary to prevent the introduction of diseases. Such measures may include the establishment of a buffer zone around the compartment in which a monitoring programme is carried out, and the establishment of additional protection against the intrusion of possible pathogen carriers or vectors. In the drafts of the new regulations dependent compartments are an important topic and much more specified than the existing regulations – and it is our impression that the EFSA audit and report is performed with the new and not the existing regulation in mind.

There are other issues as well in the report – for instance the use of both kidney and heart samples in the surveillance. There was a delay in the implementation of kidney samples (as specified in 2015/1554) by the NFSA. In order to comply the industry have been asked to reanalyze previously sampled material for BKD analysis. This was however also commented on by the EFSA report.

It is of course the interest of and the intention of both the NSFA and the industry to comply fully with the directions from Brussels. Unfortunately, in the past, the instructions from the NFSA to the industry was not fully reliable in terms of compliance with the regulations.

This is the information we have on the situation of reopening the compartments:

EFSA: We would appreciate if Norway submit supportive documentation for ISA free compartments/zones in good time before lifting restrictions, allowing us to review the documents and provide any comments before the deadline 1 November. It may be useful for Norway to have this assessment in place before a potential discussion in ScoPAFF meeting about 24 October.

The NFSA is trying their best to compile all the necessary details from all the existing compartments and give EFSA an updated list and detailed specifications of all the surveillance of the past two years. However, given the discrepancies between the NFSA and EFSA in the interpretation of the regulations in the past, we believe that without a transitory phase many of the existing compartments may fail to be reopened:

- For sea sites (dependent compartments). No additional measures have been implemented other than those described when declaring the compartments. Difficult to back-date such measures - minimum distance to other sites, boat traffic, sampling at neighboring sites? From this we believe that some of the compartments including sea sites may be difficult to reopen.
- Samplings and use of own staff. Updated instructions on the use of kidney samples was delayed by the NFSA, and for some of the surveillance over the last two years only heart samples were analyzed for ISA. AS ISA and BKD surveillance, at least for some compartments, is organized together the kidneys were most often sampled alongside the hearts required for ISA analysis. Consequently; there are examples of compartments where only heart was analyzed initially, and kidney samples were later analyzed from kidney tissue sampled for BKD analysis. The EFSA have required full traceability and documentation that all samples of heart and kidney belong to the same fish. It is likely that some sites can demonstrate full compliance and but some will not. In additions to specifications on sampling material the

EFSA also have requested a review of all sampling dates and the presence of the NFSA at the different sampling dates for the last two years. It is not clear what would be the final consequence of missing kidney samples or samplings performed without the presence of the NFSA on sites.

It is my understanding that AquaGen's own compartments should be in a relatively good situation after such a review, but since we fear that many of the existing compartments in Norway may fail to comply and will potentially be lost, we have been in dialogue with the Ministry and urged them to work politically to negotiate a transitory period for the compartments to be opened even if they were not fully compliant in the past (for instance some kidney samples may be missing from some of the early samplings). A transitory period could for instance include individual testing of all broodfish used for production of eggs for export.

So far our impression is that the Ministry is relying on the NFSA to handle this. We fear that this is not enough and the consequence will be that very few compartments are reopened in the end.

Best regards

Nina Santi

CEO

Mobile: [Redacted]

nina.santi@aquagen.no

www.aquagen.no/en



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Fra: [Redacted]@gov.scot

Sendt: onsdag 2. oktober 2019 16:06

Til: Nina Santi <Nina.Santi@aquagen.no

Emne: NSFA - ISA free - ova suspension

Dear Nina

[Redacted – out of scope]

We briefly discussed the suspension of exports of ova due to an internal EFSA audit and issues with ISA freedom attestations. I was originally alerted to the issue through correspondence from yourself to the Department of International Trade.

I am keeping the correct lines of communications open with my policy counterparts in Norway, however it would be useful to know if the industry in Norway has had any recent updates?

Best regards

[REDACTED]

[Redacted]

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From: [Redacted]@[defra.gov.uk](mailto:gov.scot)

Sent: 05 July 2019 16:06

To: [Redacted]@[trade.gov.uk](mailto:gov.scot); [Redacted]@[cefass.co.uk](mailto:gov.scot)

Cc: [Redacted]@[fco.gov.uk](mailto:gov.scot); [Redacted]@[defra.gov.uk](mailto:gov.scot); [Redacted]@gov.scot;

[Redacted]@[cefass.co.uk](mailto:gov.scot); [Redacted]@[trade.gov.uk](mailto:gov.scot); [Redacted]@[mobile.trade.gov.uk](mailto:gov.scot)

Subject: RE: Norwegian - EU Trade Barrier

Dear [Redacted]

Apologies for the slow response.

I discussed with [Redacted] (Scottish govt), who had more detailed information on the issue:

She confirmed that there is a temporary suspension on the movement of fish and ova from Norway to countries free from Infectious Salmon Anaemia (including the GB health zone). It is her understanding that this temporary suspension has been in place since June. The suspension has been put in place voluntarily following a meeting between the Norwegian Food Safety Authority and the EFTA surveillance authority on 29 May, where issues were raised with the Norwegian documentation system which lists ISA free compartments.

The Norwegian Food Safety Authority (NSFA) has written to all exporters in Norway to state that no export licenses will be issued until resolved, and that they expect that to take 3 – 4 weeks. [Redacted] will check on progress with Norwegian colleagues in the coming days, who are confident that they will be able to resolve the situation and keep disruption to a minimum. [Redacted] is correct in that Scottish govt is not privy to the exact cause of the suspension, as the NSFA are working to address issues raised before the final findings are published. We are led to believe that they are largely administrative in nature, but we cannot verify this. The Scottish fish farming industry is of course heavily reliant on the import of Norwegian ova and we are monitoring the situation very closely.

More widely, the systems in place in Europe to protect aquatic animal health have not changed and the processes to enforce current fish health legislation (EC 2006/88) remain. Member states may submit disease freedom declarations to SCOPAFF and each member state has the opportunity to comment on these. This is a long standing process which is unaffected by upcoming changes to animal health law (which will largely regulates aquatics in the same way once on force).

[Redacted] will update you on the outcome of discussions with the Norwegian authorities as soon as she has more information.

Kind regards,

[Redacted] | DrMedVet MRCVS Habilitation | [Redacted] | Future Animal & Public Health, Endemics & Traceability (FAPHET) | Animal & Plant Health | Department for Environment, Food and Rural Affairs | Area 2B, Nobel House, 17 Smith Square, London SW1P 3JR | [Redacted] | Email: [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk) | For those in Defra: [find me on people finder](#); [FAPHET Organogram](#)

[Email redacted – out of scope]

From: [Redacted]@[cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Date: Friday, 21 June 2019 at 11:59

To: [Redacted]@[trade.gov.uk](mailto:[Redacted]@trade.gov.uk)

Cc: [Redacted]@[fco.gov.uk](mailto:[Redacted]@fco.gov.uk), [Redacted]@[defra.gov.uk](mailto:[Redacted]@defra.gov.uk), [Redacted]@[defra.gov.uk](mailto:[Redacted]@defra.gov.uk), [Redacted]@[gov.scot](mailto:[Redacted]@gov.scot), [Redacted]@[cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Subject: FW: Norwegian - EU Trade Barrier

Dear [Redacted]

Your email enquiry about the statements made by the Norwegian company AquaGen about the EU mechanisms by which applications for approved compartment status for aquaculture farms are administered has made its way to be by a rather circuitous route.

[Redacted – out of scope]

As far as the statement from AquaGen about an ESA audit is concerned we are not aware of this taking place (I am presuming that the correspondent is referring to an ETFA Surveillance Authority audit). However as this is an internal ETFA process then there is no reason why we should be aware until any findings are published.

I am seeking further advice from colleagues in Scottish Government and contacts in the Norwegian Competent Authority.

[Redacted – out of scope]

Please do not hesitate to get back to me should you require anything in the interim.

Regards

[Redacted]

[Redacted]

Cefas, Barrack Road, Weymouth, Dorset, DT4 8UB, UK

Tel: +44 (0)1305 [Redacted]

Fax: +44 (0)1305 206602

www.gov.uk/cefas/fhi

www.cefas.defra.gov.uk/



www.cefas.co.uk



World Class Science for the Marine & Freshwater Environment

From: [Redacted]trade.gov.uk

Sent: 14 June 2019 03:12

To: [Redacted]@cefas.co.uk

Subject: Norwegian - EU Trade Barrier

Hi [Redacted]

Do you have any insight on the following info? Below is a summarized email from a Norwegian broodstock and egg producer. Matter has been escalated within DIT and DEFRA but appreciate if can keep information provided internal (if not already public knowledge).

Import of salmon eggs to UK (from Norway and Iceland) regulated by European Fish Health Directive. One condition for trade is that eggs come from Infectious Salmon Anemia (ISA) free compartments. The ISA-free compartments are declared by the Norwegian Food Safety Authority, however, the Fish Health Directive is under revision and changes to legislation is making these declarations increasingly difficult to obtain. The matter has escalated further. Norwegian broodfish and egg producers may face a temporary stop in all egg exports to EU from Norway after an ESA inspection earlier this year. The background is partly a different understanding of the regulations between countries and most concerns had come from the UK. Concern over how this would impact UK Salmon Industry.

Best wishes

[Redacted] BVM&S MRCVS

Specialist for Animal Sciences & Aquaculture | Agri-Tech | Bioeconomy | Department for International Trade | 55 Whitehall | London SW1A 2EY | Mobile [Redacted] | Telephone +44 (0) 20 7215 [Redacted] | [\[Redacted\]@trade.gov.uk](mailto:[Redacted]@trade.gov.uk) | gov.uk/dit | Export Opportunities | DIT Twitter | Business is GREAT Facebook

From: [Redacted]
Sent: 20 June 2019 16:48
To: [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)
Cc: [Redacted][gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Subject: Ova export advice - exports to Scotland
Importance: High

Dear [Redacted],

I hope you are both well.

I am contacting you today as we have had two queries today regarding the status of exports of salmon ova from Norway to the UK (or Scottish salmon industry).

It has been suggested to us by a Norwegian ova supplier (AquaGen) that there may be a temporary stop on all egg exports to the EU from Norway. Separately, we have been contacted by Scottish producers who are concerned that supply will be affected this year.

However, we are also aware that a submitted declaration HALL 2 – Sørfjorden stamfiskanlegg has been withdrawn as of this morning.

What is not clear is if the correspondnace we are seeing is in relation to a company who had planned to supply Scotland from compartments which had not yet regained disease freedom (but they were relying on that process to do so and increase supply this year) OR if there has indeed been advice issued which might be suggestive that exports to Scotland are at risk?

I would be very grateful if you or one of your colleagues could give me a call to discuss this.

0044131244[Redacted].

Best regards

[REDACTED]
[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe
Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 21 June 2019 12:30

To: [\[Redacted\]@nfd.dep.no](mailto:[Redacted]@nfd.dep.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Subject: Exports of Salmon Ova to Scotland

Dear [Redacted]

[Redacted] - thank you for our discussion on the phone this afternoon. I have tried to summarise below.

- The EFTA surveillance authority is responsible for assessing controls systems related to food and feed safety.
- A meeting took place between EFTA and Norwegian authorities on 29 May (?) in relation ISA free compartments.
- Issues were raised with the Norwegian documentation system for ISA free compartments.
- As a result of the meeting, the Norwegian Food Safety Authority suspended the certification of salmon ova from 'ISA free compartments' (i.e health certificates to countries which are ISA free, such as Scotland, are not being permitted).
- The NSFA is working to resolve the issue, to ensure that their list of ISA free compartments is reliable, before authorising any exports.
- It is now known how long the suspension will be required.

Is there anything else to add? I am not aware that any official notification has gone out? Also that you are working to resolve as quickly as possible.

[Redacted], is it possible for you to give me a call?

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 13 August 2019 08:56

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: Submission to note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY

Hi [Redacted]

Nothing yet, but I was speaking with [Redacted] at Benchmark yesterday and he had heard that there was a possibility this wouldn't be resolved until the end of the year. He sent me the attached article (English translation isn't great and I can't access the original as it is from a subscription website) and had heard the issue was delays in responding to/controlling ISA.

Cheers

[Redacted]

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 10 August 2019 10:49

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: Submission to note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY

Hi [Redacted]

I have had no information that is has been lifted and no further information to suggest that it will be lifted soon. [Redacted] has put feelers out to the industry in terms of contingency planning. I assume that you haven't had any import notifications through?

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 09 August 2019 10:25

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: Submission to note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY

Hi [Redacted]

Has there been any update regarding the temporary suspension of exports from Norway? Has it been lifted?

Thanks

[Redacted]

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 08 July 2019 15:23

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment

Subject: RE: Submission to note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY

Please note that this submission regards a temporary suspension of exports of salmon and rainbow trout ova **from Norway to Scotland**. Apologies for any confusion caused by the mistake in the covering email.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]

Sent: 25 June 2019 12:27

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>

Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>; Mitchell A (Alastair) <[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>; Voas S (Sheila) <Sheila.Voas@gov.scot>; [Redacted] SG staff <CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff

Subject: Submission to note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY

PS Cabinet Secretary for the Rural Economy
PS Minister for Trade, Investment and Innovation

Please find attached a submission regarding a temporary suspension of exports of salmon and rainbow trout ova from Scotland to Norway. Officials are closely monitoring the situation and will keep Ministers updated.

PS Cabinet Secretary for the Rural Economy – please note that I will be sending a submission on the Farmed Fish Health Framework later this afternoon, as agreed yesterday.

Thank you

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



Submission - FE -
Salmon ova imports

From: [Redacted]@gov.scot>
Sent: 13 August 2019 09:17
To: [Redacted]@gov.scot
Cc: [Redacted]@gov.scot>
Subject: RE: ISA article-kyst.no

Thanks [Redacted]. "He points out that the delay in question is a minimum of one month, six weeks or more."

This rings with original advice. Interesting to read the other headlines which are submerged in the article too.

CC. [Redacted]

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@bmkgenetics.com>
Sent: 12 August 2019 13:53
To: [Redacted]@gov.scot>
Subject: ISA article-kyst.no

1. Important to get started quickly when fighting ILA

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Senior Advisor in the Food Safety Authority, Knut Rønningen says that ESA pointed out the response time when they were on inspection in May. Photo: Harrieth Lundberg

According to senior adviser Knut Rønningen of the Norwegian Food Safety Authority, the Norwegian Food Safety Authority drops hearings when a fight zone is to be established.

By Harrieth Lundberg

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The Norwegian Food Safety Authority has announced that they are dropping hearings on the establishment of combat zones for diseases such as ILA and PD.

Senior adviser Knut Rønningen at the Norwegian Food Safety Authority explains that this is partly due to an ESA inspection in May where they pointed out a number of shortcomings in the way Norway has handled ILA cases, according to their interpretations of the Fish Witch Directive.

Read also: [The industry must bear the costs of a new ILA plan](#)

- We do not agree with all the comments that ESA has made, but we do agree. Much of what ESA has pointed out we have looked at in connection with the work of a new fight plan for ILA, says Rønningen.

2. Guilty

He adds that they have been aware that there have been some weaknesses. According to Rønningen, ESA criticism can be summarized in two areas, and one is what the Norwegian Food Safety Authority has done to secure areas with ILA-free status.

- There are some ILA-free segments along the coast that have been approved ILA-free. It is their assurance and the guarantee that they are actually ILA-free has probably been too bad, which ESA has pointed out, he elaborates.

The other area that ESA has pointed out is the importance of Rønningen.



Norway has been criticized for low response time with implementation of anti-bribery measures for ILA outbreaks. Illustration photo: Elvis Chikwati

- It is the response time and how quickly we are getting started with anti-ILA measures. This is something that we can say we have a poor conscience for, and something that we would have done regardless of the new combat plan, ”explains the senior adviser.

3. Faster with implementation

At the same time, Rønningen says that it is important after the criticism to show ESA that the Norwegian authorities follow what they themselves think is technically correct. He reiterates that getting started on combat measures faster is something they would most likely have done at a later date with a view to the new ILA fight plan.

- We are now starting to see what is being done in the Faroe Islands and in Chile. And one of the things that makes them different from us is that they are quicker to implement countermeasures, he points out.

Also read: [New EU rules entail new combat plan for HPR0 and ILA](#)

4. Been on hearing

In addition, according to the senior adviser, they have a legal basis for not having the control area regulations on hearing.

- We have a regulatory template in which all the relevant measures that may be implemented in connection with an ILA outbreak are laid down, explains Rønningen.

The regulations have been consulted, and Rønningen explains that it is possible that it will make some minor changes.

- It has taken a very long time to get the measures implemented because we have had the draft regulations consulted, and many of the fish farming companies have engaged lawyers, he says.

He goes on to say that there have been lengthy processes, including complaints, which in turn have delayed the opportunity to get started with an active fight against the ILA. He points out that the delay in question is a minimum of one month, six weeks or more.

- It is an important step to get measures implemented within the control regulations fairly quickly, says Rønningen.

In conclusion, he adds that establishing a control area is quite important for controlling all the movement of fish within a certain risk area, in addition to having control over all other traffic that may be of importance in spreading any ILA infection to other areas.

From: [Redacted]

Sent: 16 August 2019 10:24

To: [Redacted][@hient.co.uk](mailto:[Redacted]@hient.co.uk); [Redacted][@scotent.co.uk](mailto:[Redacted]@scotent.co.uk)

Cc: [Redacted][@hient.co.uk](mailto:[Redacted]@hient.co.uk); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: meetings Aqua Nor

Hi [Redacted]

I can confirm that we have been in regular contact with the Norwegian Food Safety Authority regarding the temporary suspension of export certification of ova from Norway. Ministers are aware of the suspension although I have not provided a recent update (we last thought the temporary suspension might be lifted mid-July)

Thanks for sharing this communication with me. We had some communications with DIT last month.

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@[hient.co.uk](mailto:[Redacted]@hient.co.uk)

Sent: 16 August 2019 10:15

To: [Redacted]@[scotent.co.uk](mailto:[Redacted]@scotent.co.uk)

Cc: [Redacted]@[hient.co.uk](mailto:[Redacted]@hient.co.uk); [Redacted]@[gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: meetings Aqua Nor

Hi [Redacted]

From just a quick read the issue appears to be in the Norwegian authorities' handling of applications to export – rather than the attitude of Scottish authorities to imports of salmon eggs?

[Redacted – out of scope]

Thanks

[Redacted]

From: [Redacted]@[scotent.co.uk](mailto:[Redacted]@scotent.co.uk)

Sent: 16 August 2019 08:34

To: [Redacted]@[hient.co.uk](mailto:[Redacted]@hient.co.uk)

Cc: [Redacted]@[hient.co.uk](mailto:[Redacted]@hient.co.uk)

Subject: RE: meetings Aqua Nor

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Hi [Redacted],

[Redacted – out of scope]

I had offered to put [Redacted] in touch with relevant contacts in Scotland when she flagged the issue with the egg delivery some weeks ago. However, she said that she has got the right contacts and information.

From Nina Santi's email below it sounds like this issue could be resolved in the coming months.

But I agree it would be good to brief the Minister and I will ask [Redacted] if she has been in touch with Marine Scotland.

Best regards

[Redacted]

From: Nina Santi <Nina.Santi@aquagen.no>

Sent: 13 August 2019 22:24

To: [Redacted]@mobile.trade.gov.uk

Cc: [Redacted]@trade.gov.uk

Subject: SV: AquaGen - Scotland

Dear [Redacted],

Thank you for your e-mail.

I have already an understanding that contacts between Scottish authorities and Norwegian authorities have contributed in moving this issue higher on the agenda with the Norwegian Authorities.

The temporary suspension is still in force, and according to our information the Food Safety Authority in Norway have asked the ESA for a delay until September 1st before they submit a final response to the audit, partly because of the holiday season. I know that several deliveries were held back from this earlier this summer, but this issue is hopefully resolved by November when the next egg delivery season normally starts.

It is also my information that the issues are mainly of administrative nature and probably an effect of too little resources being allocated to follow up on this over time. Salmonid egg exports are a very tiny issue for the authorities but of major importance to the producers, so a little push from outside Norway can be essential to resolve this.

[Redacted – out of scope]

Best regards

Nina Santi

CEO

Mobile: [Redacted]

nina.santi@aquagen.no

www.aquagen.no/en

[Redacted]

[Redacted], Central Europe

Scottish Development International

Kasernenstraße 27
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Germany

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[\[Redacted\]@scotent.co.uk](mailto:[Redacted]@scotent.co.uk)

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Scottish Development International is a joint venture between the Scottish Government and its economic development agencies, Scottish Enterprise and Highlands & Islands Enterprise

From: [Redacted]@hient.co.uk

Sent: 15 August 2019 18:51

To: [Redacted]@scotent.co.uk

Cc: [Redacted]@hient.co.uk

Subject: RE: meetings Aqua Nor

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi [Redacted]

Thanks for sharing this information. Both Aquagen and [Redacted] of Grieg Seafood are expected to attend the seminar. The issue of salmon ova importation noted for Aquagen is a matter that comes under Marine Scotland's jurisdiction. Do you know if they are aware of [Redacted] planned meeting? It seems to me that [Redacted] should be aware of the fish health regulations (if she isn't familiar with the legislation) and we should be sure that Mr Ewing is prepared for any conversation Aquagen might have with him at the seminar.

[Redacted – out of scope]

Many thanks

[Redacted]

From: [Redacted] **On Behalf Of** Cabinet Secretary for the Rural Economy

Sent: 22 October 2019 11:32

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>

Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>; Mitchell A (Alastair) <[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>; Voas S (Sheila) <Sheila.Voas@gov.scot>; [Redacted] SG staff;

Communications Rural Economy & Environment <CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff; Black G (Graham) <Graham.Black@gov.scot>; Director of Marine Scotland Mailbox

<Directormarinescotland@gov.scot>; <[\[Redacted\]@scotland.gsi.gov.uk](mailto:[Redacted]@scotland.gsi.gov.uk)>; Mcdonnell T (Tim)
<Tim.Mcdonnell@gov.scot>

Subject: RE: Update - To note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY - Aquaculture

[Redacted],

Mr Ewing has noted and has asked if he can get a read out from the meeting due to take place on 24/10. Mr Ewing is keen to be kept closely advised on this.

Thanks,

[Redacted]

[Redacted]

Cabinet Secretary for Rural Economy

CabsecRE@gov.scot

0131 244 [Redacted]

[Redacted]

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From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 15 October 2019 12:00

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>

Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform

<CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural Environment

<MinisterRANE@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Dobson L (Leanne)

<Leanne.Dobson@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>; Mitchell A (Alastair)

<[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>; Voas S (Sheila) <Sheila.Voas@gov.scot>; [Redacted] SG staff;

Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff; Black G (Graham)

<Graham.Black@gov.scot>; Director of Marine Scotland Mailbox

<Directormarinescotland@gov.scot>; [\[Redacted\]@scotland.gsi.gov.uk](mailto:[Redacted]@scotland.gsi.gov.uk); Mcdonnell T (Tim)

<Tim.Mcdonnell@gov.scot>

Subject: Update - To note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY - Aquaculture

PS Cabinet Secretary for the Rural Economy
PS Minister for Trade, Investment and Innovation

I previously supplied advice regarding the temporary suspension of exports of salmon and rainbow trout ova from Norway. The suspension has been in place since June, following an internal audit by the EFTA surveillance authority (responsible for

assessing controls systems related to food and feed safety). A number of issues with the Norwegian official control system were identified which meant that the Norwegian Food Safety Authority (NFSA) could not provide a reliable list of Infectious Salmon Anaemia (ISA) disease free compartments. Scotland is free from ISA, no imports from Norway can be accepted unless an attestation of disease freedom can be signed by Norwegian Authorities.

Mr Ewing raised this issue at a meeting with Mr Nesvik, the Norwegian Fisheries Minister, at AquaNOR in August. The NFSA has been working hard to address the concerns raised during in the audit report however this has taken longer than expected. Current advice from the NFSA is that they are working along a plan which will enable exports from 1st November. This would be the start of Norway's normal peak in ova exports. Part of this process involves establishing a new list of ISA free compartments and discussions with EFTA to determine whether the issues raised have been satisfactorily resolved. Correspondence suggests that some areas will lose their ISA free status, and therefore the areas open to trade with Scotland will reduce. A risk of further delay, pending discussions with EFTA, also remains.

We have been informed that the EFTA audit and Norwegian export suspension will be discussed at the EU's Standing Committee on Plans, Animals, Food and Feed meeting on 24th October. Defra officials have confirmed attendance and will provide feedback following the meeting, including any actions or decisions taken.

Risks and Stakeholder Views

Scottish salmon production is heavily reliant upon the import of Norwegian ova ~ 90% of ova imports come from Norway. We have been in discussion with industry contacts in Norway and with the Scottish Salmon Producers' Organisation to discuss potential impacts. Relatively few queries have been received by Scottish Government and the SSPO regarding the suspension. This suggests that commercial discussions between producers and suppliers have been positive or reassuring. The Fish Health Inspectorate has noted an increased in imports from Iceland and some resilience may also exist within Scottish supplies – for example the new AquaGEN facility which has been established in Dumfries and Galloway. The SSPO has been asked to inform us if any of its members report concerns.

Rigorous application of European aquatic animal health law is essential in order to evidence and maintain disease free status and support trade. The surveillance programme implemented by Scottish Government's Fish Health Inspectorate protects Scotland's high health status. The Marine Scotland aquatic animal health programme will continue to be vital if the UK leaves the European Union.

I will provide a further update following feedback from the meeting on 24th October.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe
Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 03 October 2019 18:37

To: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)>;

[\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Subject: RE: temporary suspension update

Hi [Redacted]

Thank you very much for this update.

Would it be possible for you to share the list of sites which will be suggested for opening for trade once you have concluded your considerations, noting that this would not be a confirmed final list and that there would still be discussions with ESA and details to be considered before any suspension can be lifted?

The reason I ask is that I am trying to get a grasp of whether there might still be an issue with supply to Scottish customers if the temporary ban is lifted, and a number of hatcheries which have historically supplied Scotland are in compartments which cannot achieve ISA free status yet.

It goes without saying that protection of Scotland's fish health status is essential and we fully support the scrutiny and large volume of work being undertaken by you to ensure that the requirements for ISA freedom are met. My considerations are purely in a policy sense for potential knock on impacts.

You might not be able to share the suggested list, in which case I would be grateful for an indication if you think there might still be a supply issue for Scotland post 1 November if you can.

Finally, I recognise the risk remains that the temporary suspension could still be in place post 1 November, pending further discussions. Thank you for the further offer to keep us updated.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)>

Sent: 03 October 2019 16:34

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Subject: SV: temporary suspension update

Dear [Redacted],

We have reviewed all existing ISA-free segments, including surveillance, biosecurity and relocation of fish, as well as the need of extra measures to safeguard category I for ISA.

We are about to conclude on a list of sites we think would be justifiable to open for trade.

However, NFSA will seek consultations with ESA on practical details before we consider lifting the suspension.

I will keep you updated on any movement.

Best regards,

[Redacted]

Fra: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sendt: mandag 30. september 2019 14:30

Til: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Kopi: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Emne: RE: temporary suspension update

Dear [Redacted]

I am checking in to see if there is any update on the below? I am aware that this topic came up briefly during a meeting of Mr Ewing, Cabinet Secretary for the Rural Economy, and Mr Nesvik, Fisheries Minister, at the AquaNOR conference, and Mr Nesvik thought officials would be in a better place to provide an update at the end of September. As ever, grateful for any information you can provide.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe
Tel: +44 (0)131 244 [Redacted]
E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Web: <http://www.scotland.gov.uk/marinescotland>
Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@gov.scot
Sent: 02 August 2019 08:56
To: [Redacted]@mattilsynet.no
Subject: RE: temporary suspension update

Hi [Redacted]

[Redacted – out of scope] to check if you have received any feedback from ESA and whether you expect that the ISA free compartment listings will be accepted?

We are considering whether we need to hold a meeting with our producers to discuss potential production impacts.

Grateful as always for any information you can provide me with.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe
Tel: +44 (0)131 244 [Redacted]
E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Web: <http://www.scotland.gov.uk/marinescotland>
Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@mattilsynet.no
Sent: 25 July 2019 08:58
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Cc: [Redacted]@mattilsynet.no; [Redacted]@mattilsynet.no; <[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>;
[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Subject: SV: temporary suspension update

Dear [Redacted],

Thank you. No movement so far.

I will write you and all on copy as soon as I get any new information.

[Redacted]

Fra: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sendt: onsdag 24. juli 2019 17:35

Til: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Kopi: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Emne: RE: temporary suspension update

Dear [Redacted]

[Redacted – out of scope] I have copied my aquaculture policy and fish health inspectorate colleagues into this email so that they have the latest advice from you and in case there are any updates while I am out of the office.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Sent: 17 July 2019 08:57

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Cc: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Subject: SV: temporary suspension update

Dear [Redacted],

The list of ISA free compartments annexed to the Norwegian regulation was updated per 15 July. Also, we will publish the list of ISA free compartments on our web pages today, 17 July. I will send you the link as soon as I get it.

We have not received any feedback from ESA yet.

I will keep you updated on any movement.

[Redacted]

Fra: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Sendt: tirsdag 16. juli 2019 14:37
Til: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)
Kopi: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)
Emne: RE: temporary suspension update

Dear [Redacted]

Thank you for keeping me up to date with progress on the ISA listings – particularly as I understand this will have been a very busy time for you.

Can you confirm whether the lists were updated on 15th and if you have received any feedback from EFTA/ESA? My understanding is that this would take a couple of days at a minimum and may take longer depending on what feedback is received.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)
Sent: 08 July 2019 14:01
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Cc: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)
Subject: SV: temporary suspension update

Dear [Redacted],

We are about to finish the updated list of ISA free compartments in Norway, and are planning to publish the list by the 15th of July.

Hopefully we will be able to resume certification and trading after the list is published, but the exact time of reopening may also depend on the feedback from ESA.

I will keep you updated.

Best regards,

[Redacted]

Fra: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Sendt: mandag 8. juli 2019 10:59
Til: [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)
Emne: temporary suspension update

Hi [Redacted]

I am looking for an update regarding the temporary suspension of export licences from ISA free compartments if you are able. When we spoke last we discussed that the suspension was likely to last 3 – 4 weeks, but that was subject to change. I will be free on my phone for most of the day ([Redacted]) or happy for a short email update.

Best regards

[REDACTED]
[Redacted]

From: [Redacted]

Sent: 17 August 2019 13:43

To: <[Redacted]@gov.scot>; Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>

Cc: Cabinet Secretary for Culture, Tourism and External Affairs <CabSecCTEA@gov.scot>; Cabinet Secretary for Justice <CabSecJustice@gov.scot>; Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECLR@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Director of Marine Scotland Mailbox <Directormarinescotland@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>; [Redacted] SG staff; Communications Rural Economy & Environment <CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff

Subject: Additional Information; Ova suspension. RE: Aquaculture - Briefing - Fergus Ewing - Aqua Nor - 15 August 2019

PS Cabinet Secretary for Rural Economy

I previously advised Ministers of a temporary suspension of ova exports from Norway. Please find attached an FMQ style brief on the temporary suspension which Mr Ewing should be aware of whilst attending AquaNOR.

The suspension is temporary and has been in place since June as a the result of an audit by the European surveillance authority as EFTA. The Norwegian Food Safety Authority (NSFA) has implemented the suspension on export certification as a precaution whilst it address issues raised by EFTA before its final findings are published. This process is taking longer than expected, with initial advice suggesting that the suspension would likely be lifted by the start of August.

Due to the delay, officials have consulted with the Scottish Salmon Producers' Organisation with regard to potential production concerns (90% of Scottish production relies on imports from Norway) and contingency planning. Initial feedback is that operators are confident that outstanding issues will be resolved soon, and before the start of the main egg exporting season from Norway in November.

We continue to keep the situation under review and are in regular contact with the NSFA on the matter.

This issue was originally brought to our attention through the Department of International Trade who received correspondence from Nina Santi, CEO of Aquagen. Earlier this year AquaGen signed a deal to buy Scottish Sea Farms' freshwater hatchery at Holywood near Dumfries which will provide a new supply of eggs in Scotland and contribute to ova security.

I will print a copy of the attached for private office and supply a copy on Monday.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 15 August 2019 11:55

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>

Cc: Cabinet Secretary for Culture, Tourism and External Affairs <CabSecCTEA@gov.scot>; Cabinet

Secretary for Justice <CabSecJustice@gov.scot>; Cabinet Secretary for the Environment, Climate

Change and Land Reform <CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural

Environment <MinisterRANE@gov.scot>; Minister for Trade, Investment and Innovation

<MinisterTII@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Director of Marine Scotland

Mailbox <Directormarinescotland@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>;

[Redacted] SG staff; Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted]@gov.scot

Subject: Aquaculture - Briefing - Fergus Ewing - Aqua Nor - 15 August 2019

Morning [Redacted]/ PO,

Please see attached briefing for Mr Ewing's visit to Aqua Nor, Norway.

[Redacted – out of scope]



Redacted - Salmon
Farming FMQ.docx

[Redacted]

Area 1B North

VICTORIA QUAY, The Shore

EDINBURGH

EH6 6QQ
Tel: 0300 244 [Redacted]
Mob: [Redacted]
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 25 June 2019 12:27

To: Cabinet Secretary for the Rural Economy <CabSecRE@gov.scot>; Minister for Trade, Investment and Innovation <MinisterTII@gov.scot>

Cc: Cabinet Secretary for the Environment, Climate Change and Land Reform <CabSecECCLR@gov.scot>; Minister for Rural Affairs and the Natural Environment <MinisterRANE@gov.scot>; Higgins K (Kate) <Kate.Higgins@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>; Mitchell A (Alastair) <[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>; Voas S (Sheila) <Sheila.Voas@gov.scot>; [Redacted] SG staff;

Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff

Subject: Submission to note - TEMPORARY SUSPENSION OF EXPORTS OF SALMON AND RAINBOW TROUT OVA TO SCOTLAND FROM NORWAY



Redacted - Salmon
Farming FMQ.docx

PS Cabinet Secretary for the Rural Economy
PS Minister for Trade, Investment and Innovation

Please find attached a submission regarding a temporary suspension of exports of salmon and rainbow trout ova from Scotland to Norway. Officials are closely monitoring the situation and will keep Ministers updated.

[Redacted – out of scope]

Thank you

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@gov.scot>
Sent: 26 June 2019 12:10
To: [Redacted] SG staff; Higgins K (Kate) <Kate.Higgins@gov.scot>; [Redacted]@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>
Cc: Communications Rural Economy & Environment <CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>
Subject: RE: SpAd view - lines to take - suspension of salmon ovia from Norway

Fair point. As follows. Thanks

SG spokesperson said:

“Following discussions between the EFTA surveillance authority and Norwegian Food Safety Authority, a temporary suspension has been placed on exports of live fish and ova from Norway.

“Protecting the health of our marine species and environment is paramount, so these precautions are being taken – in accordance with international standards – to minimise the risk of contamination and disease.

“We are working closely with our UK counterparts and Norwegian colleagues to monitor the situation and we expect that certification will resume in the next 3-4 weeks.”

From: [Redacted]@gov.scot>
Sent: 26 June 2019 12:08
To: [Redacted] SG staff; Higgins K (Kate) <Kate.Higgins@gov.scot>; [Redacted] [Redacted]@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>
Cc: Communications Rural Economy & Environment <CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff
Subject: Re: SpAd view - lines to take - suspension of salmon ovia from Norway

Worth clarification that this applies to live fish and ova in case it is interpreted as fish products for processing and food retail?

Sent from my BlackBerry 10 smartphone.

From: [Redacted] (MARLAB)
Sent: Wednesday, 26 June 2019 12:04
To: [Redacted]@gov.scot; Higgins K (Kate); [Redacted]@gov.scot; Dobson L (Leanne)
Cc: Communications Rural Economy & Environment; [Redacted] SG staff
Subject: RE: SpAd view - lines to take - suspension of salmon ovia from Norway

[Redacted]

Having discussed with [Redacted], I would suggest the following shorter line.

“Following discussions between the EFTA surveillance authority and Norwegian Food Safety Authority, a temporary suspension has been placed on exports of fish and ova from Norway.

All imports of ova to Scotland are carried out in accordance with well-established rules and internationally agreed standards, to minimise the risk of cross contamination and disease.

We are working closely with our UK counterparts and Norwegian colleagues to monitor the situation and we expect that certification will resume in the next 3-4 weeks.”

[Redacted]

Marine Scotland | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mobile: +44 (0) [Redacted]

www.gov.scot/marinescotland

From [Redacted]@gov.scot>

Sent: 26 June 2019 11:08

To: Higgins K (Kate) <Kate.Higgins@gov.scot>; [Redacted]@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: SpAd view - lines to take - suspension of salmon ovias from Norway

Thanks [Redacted]

I'll send up to Cab Sec once officials have suggested a simplified explanation for the top line.

From: Higgins K (Kate) <Kate.Higgins@gov.scot>

Sent: 26 June 2019 10:58

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: SpAd view - lines to take - suspension of salmon ovias from Norway

Happy

Sent with BlackBerry Work

(www.blackberry.com)

From: [Redacted]@gov.scot>

Date: Wednesday, 26 Jun 2019, 10:55 am

To: Higgins K (Kate) <Kate.Higgins@gov.scot>, [Redacted]@gov.scot>, Dobson L (Leanne) <Leanne.Dobson@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>, [Redacted] SG staff

Subject: RE: SpAd view - lines to take - suspension of salmon ovias from Norway

Thanks Kate. How about the following?

SG spokesperson said:

“Following discussions between the EFTA surveillance authority and Norwegian Food Safety Authority, a temporary suspension has been placed on exports of fish and ova to Scotland and other Infectious Salmon Anaemia disease-free areas, as a precaution, whilst investigations are ongoing.

“Protecting the health of our marine species and environment is paramount, so these precautions are being taken – in accordance with international standards – to minimise the risk of contamination and disease.

all imports of ova to Scotland are carried out in accordance with well-established rules laid out in EU and Scottish legislation, as well as internationally agreed standards, to minimise the risk of cross contamination and disease.

“We are working closely with our UK counterparts and Norwegian colleagues to monitor the situation and we expect that certification will resume in the next 3-4 weeks.”

From: Higgins K (Kate) <Kate.Higgins@gov.scot>

Sent: 26 June 2019 10:47

To: [Redacted]@gov.scot>; Dobson L (Leanne) <Leanne.Dobson@gov.scot>; [Redacted]@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted]@gov.scot>; [Redacted] SG staff

Subject: RE: SpAd view - lines to take - suspension of salmon ovia from Norway

Can we add a line about taking seriously our responsibility to protect health of our fish and other marine species etc

Agree with [Redacted] remaking plainer if we can

Sent with BlackBerry Work

(www.blackberry.com)

From: [Redacted]@gov.scot>

Date: Wednesday, 26 Jun 2019, 10:42 am

To: Dobson L (Leanne) <Leanne.Dobson@gov.scot>, [Redacted]@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>, [Redacted] SG staff; Higgins K (Kate) <Kate.Higgins@gov.scot>, [Redacted] SG staff

Subject: RE: SpAd view - lines to take - suspension of salmon ovia from Norway

Hi

Sorry - I didn't pick up on this last night.

[Redacted] - how can we explain this in a simple way?

Is it ok to be specific and say salmon and rainbow trout, including ova ? Or am I missing a susceptible species / carrier?

Would we need to say fish and ova susceptible or carrier of ISA or something?

Thanks

[Redacted]

Sent with BlackBerry Work

(www.blackberry.com)

From: Dobson L (Leanne) <Leanne.Dobson@gov.scot>

Date: Wednesday, 26 Jun 2019, 10:29 am

To: [Redacted]@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>, [Redacted] SG staff, Higgins K (Kate)

<Kate.Higgins@gov.scot>

Subject: RE: SpAd view - lines to take - suspension of salmon ovia from Norway

Hi [Redacted],

Have copied in Kate as not too sure if this would be for Ms C or Mr E (or both?) to consider. Lines look okay to me – only thing to flag is if we just say “exports of fish and ova” when referring to the current suspension could that be interpreted as wider than salmon?

Thanks,

Leanne

Please note Scottish Ministers, Special advisers and the Permanent Secretary to the Scottish Government are covered by the terms of the Lobbying (Scotland) Act 2016. See www.lobbying.scot for information.

From: [Redacted]@gov.scot>

Sent: 26 June 2019 10:15

To: Dobson L (Leanne) <Leanne.Dobson@gov.scot>

Cc: Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] SG staff

Subject: SpAd view - lines to take - suspension of salmon ovia from Norway

Hi Leanne.

As you will be aware, there is a temporary suspension of exports of salmon ova from Norway. Given the recent interests in salmon farm health and danger of this being conflated with that issue, thought it would be prudent to clear some media lines. Grateful for feedback on the following pls.

SG spokesperson said:

“Following discussions between the EFTA surveillance authority and Norwegian Food Safety Authority, a temporary suspension has been placed on exports of fish and ova to Scotland and other Infectious Salmon Anaemia disease-free areas, as a precaution, whilst investigations are ongoing.

“All imports of ova to Scotland are carried out in accordance with well-established rules laid out in EU and Scottish legislation, as well as internationally agreed standards, to minimise the risk of cross contamination and disease.

“We are working closely with our UK counterparts and Norwegian colleagues to monitor the situation and we expect that certification will resume in the next 3-4 weeks.”

From: [Redacted]@gov.scot
Sent: 28 October 2019 18:36
To: [Redacted]@defra.gov.uk>; [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>
Subject: RE: Salmon egg trade query

Hi [Redacted]

[Redacted – out of scope]

We’ve already supplied some information on this to Defra, but I not you are not on the copy list, so off the hook!

[Redacted – out of scope]

Imports are essential for the functioning of our salmon industry in particular.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

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E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@defra.gov.uk
Sent: 28 October 2019 13:42
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Subject: Salmon egg trade query

[Redacted],

[Redacted – out of scope]

On another note, I've been asked some questions on the import/export of salmon eggs/smolts by our trade team. I've provided high level answers, but feel you may be better placed to provide a bit more detail. This information's been requested by to better understand no deal impacts.

1. Do aquaculture businesses buy salmon/trout eggs and/or smolts from elsewhere to rear?
2. [Redacted – out of scope]

Many thanks,

[Redacted] | Migratory and Freshwater Fisheries and Aquaculture Team |
Domestic fisheries and reform | **Department for Environment, Food and Rural Affairs** |
Jabber: (020789) [Redacted] | Mobile: [Redacted] | Email: [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)
Address: Horizon House, Deanery Road, Bristol, BS1 5AH

Working days: Mondays 09:00-15:00, Tuesdays 09:00-15:00, Wednesdays and Fridays

Attachment

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 09 July 2019 13:48
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)
Cc: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted] <[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>;
[Redacted]n@gov.scot>; [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk);
[Redacted]defra.gsi.gov.uk; [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot);
[Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Subject: RE: Seedstock imports for UK aquaculture exports

Hi [Redacted]

I would also add that so far this year the Scottish Aquaculture industry has imported almost 10 million salmon ova from the Republic of Ireland along with 300,000 smolts.

The Scottish industry is continuing to import mussels from the Republic of Ireland with 354 tonnes imported last year and trade ongoing this year.

Thanks

[Redacted]

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 05 July 2019 14:04
To: [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)
Cc: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot);
[Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk);
[Redacted][@defra.gsi.gov.uk](mailto:[Redacted]@defra.gsi.gov.uk); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk);
<[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>
Subject: RE: Seedstock imports for UK aquaculture exports

Hi [Redacted]

Our aquaculture contact for trade (and associated trade certification post Brexit) has been [Redacted], copied, whom we have had many discussions with regarding the

requirement of ova import from EU27 and EEA post Brexit. We have been assured that this trade will continue as is 6 months post Brexit, for things coming into the UK at least. We've not been involved in any conversations with yourself or DIT, and I would welcome more information about any work that you have planned.

Our main fish farming industries are the salmon farming and rainbow trout industry, and mussel and pacific oysters. There are a number of other species which are also grown.

With regard to your questions much of the information you are looking for is available in our production surveys which can be found here (separated by fish and shellfish); <https://www2.gov.scot/Topics/marine/Fish-Shellfish/FHI/surveys..> A new fish production survey for 2018 is expected ~ September.

- **Would you be able to provide any additional information on the origin of salmon seedstock, as well as on seedstock for other UK aquaculture exports?**

[Redacted – out of scope]

Salmon

Table 22a – shows importance of Iceland and Norway as source of ova for Scotland.

[Redacted – out of scope]

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]

Sent: 18 February 2019 10:05

To: [\[Redacted\]@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com)>

Cc: [\[Redacted\]@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com)>; [\[Redacted\]@organicseaharvest.co.uk](mailto:[Redacted]@organicseaharvest.co.uk);

[\[Redacted\]@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com)>

Subject: RE: Import Notification

Hi [Redacted]

I hope you're well and thanks for your email.

I spoke with [Redacted] at the Marine Institute and she informed me that there was an error in the consignee name on the certificate, but this only came to light once the certificate had been issued and it was too late to issue a corrected version to travel with the ova. She has updated it in the electronic system to Organic Sea Harvest. I was content that the rest of the certificate was correct and the important part was that the destination site was correct.

Please could you keep a copy of this email with the certificate so that whoever checks knows that I am aware of the error and no further action is required.

Cheers

[Redacted]

From: [Redacted][@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com)
Sent: 15 February 2019 14:04
To: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot);
Cc: [Redacted][@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com); [Redacted][@organicseaharvest.co.uk](mailto:[Redacted]@organicseaharvest.co.uk);
[Redacted][@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com)
Subject: Import Notification

Good Afternoon [Redacted]

Please find attached import notification of 584,000 Fanad eggs arrived from Ireland yesterday.

In the Intra trade certificate that came along with the shipment Consignee details were printed incorrect. Instead of Organic sea Harvest it was printed Scottish Sea Farms Ltd.

Consignor have advised us that it has been amended both with their Irish authorities and with Marine Scotland Science, Scotland. It's just for your information that the document that I hold has to be amended.

I am aware that there is an inspection in our fish farm on 25th of this month from Marine Scotland and can be amended by that time by our authorities.

Many Thanks

[Redacted]

[Redacted]
Atlantic Salmon

T [Redacted]

E [\[Redacted\]@hendrix-genetics.com](mailto:[Redacted]@hendrix-genetics.com)
W www.landcatch.com



Landcatch Natural Selection Ltd
Ormsary Fish Farm, Lochgilphead
Argyll, PA31 8PE, Scotland, UK-EU

From: [Redacted] <[Redacted]@gov.scot>
Sent: 20 June 2019 17:26
To: [Redacted]@gov.scot; [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>; [Redacted]gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>
Subject: RE: AquaGen - Scotland

Hi [Redacted]

We discussed.

It might be the case that (like with Rimstaad) Aquagen expected the declarations to be in place in time for their ova requirements. However – definitely need to confirm what is what, and also gauge of how of a deficit there might be.

I was at Inchmore on Monday and they said they were getting their first batch of Icelandic eggs ever in. Perhaps that was to do with supply – or perhaps they just meant the first batch to the new Mowi hatchery.

I have contacted [Redacted] and I'll let you know if/when I hear something back. I have the other contact

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted]@gov.scot
Sent: 20 June 2019 16:20
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted]@gov.scot
Cc: [Redacted]gov.scot>; [Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot; [Redacted]@gov.scot>
Subject: RE: AquaGen - Scotland

[Redacted]

It would appear to be a decision internal to Norway – have you connections that you could explore the issue with, or we can try and generate some information here – what do you think? It would be a reasonable question, given the MoU between Scotland and Norway on the subject of aquaculture.

It certainly will have a significant impact if there is an impasse into the autumn, around 90% of our salmon ova are foreign sourced, the vast majority from Norway.

[Redacted]

Marine Scotland|Marine Laboratory|375 Victoria Road|Aberdeen|AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mobile: [Redacted]

www.gov.scot/marinescotland

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 20 June 2019 13:51

To: [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>

Cc: [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: AquaGen - Scotland

Importance: High

Hi [Redacted]

Thanks for your email.

Forgive me, I am not up to date. What regions have recently been withdrawn? Was any reasoning given?/ were they compartments which had been closed for some time due to ISA?

I am also not sure what an ESA inspection is? Unfortunately, it sounds as though this is something internal which we cannot influence and I am assuming that they are getting their advice straight from the authorities in Norway. We should state that the process has not changed.

Is it worth getting in touch with [Redacted] to check the validity of this statement “**but from our understanding we face a temporary stop in all egg exports to EU from Norway after an ESA inspection earlier this year.**” They were the previous contact for Rimstaad. Alternatively I would suggest [Redacted] and [Redacted] given we have met them a couple of times at the fish health network meeting?

I would be happy to do so. But not sure what official protocol is and understand that this is from a UK perspective. I am concerned that this might escalate to Ministers quickly too, so will need to make sure we have the facts right.

Cheers

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Sent: 20 June 2019 13:26

To: [Redacted][gov.scot](mailto:[Redacted]@gov.scot)

Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: FW: AquaGen - Scotland

Importance: High

Hi [Redacted]

Please see email chain below that has bounced around government departments a little. The key email is dated 10 June from AquaGen.

My intention is to provide a response to [Redacted] at the Department of International Trade along the lines that systems for assessing applications for compartment status have been in place for many years, and have not changed, recent Norwegian applications have been commented upon by a number of member states, and that the Norwegians have voluntarily withdrawn their last two applications.

No idea what an ESA inspections is (could be referring to an EFTA inspection though I cannot find anything on that website).

Are you happy with this approach?

Regards

[Redacted]

From: [Redacted][@fco.gov.uk](mailto:[Redacted]@fco.gov.uk)

Sent: 11 June 2019 13:01

To: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Cc: [Redacted][@trade.gov.uk](mailto:[Redacted]@trade.gov.uk); [Redacted][@mobile.trade.gov.uk](mailto:[Redacted]@mobile.trade.gov.uk)>;

[Redacted][fco.gov.uk](mailto:[Redacted]@fco.gov.uk)>; [Redacted][@fco.gov.uk](mailto:[Redacted]@fco.gov.uk)>

Subject: FW: AquaGen - Scotland

Hi both,

I just wanted to flag the email below which has been sent to [Redacted] (sector specialist in DIT) and us. We wanted to check if you are aware of the question raised

below? I imagine [Redacted] will also be following up through DIT channels. The main question seems to be whether we have been putting pressure on Norway through the EU (however indirectly) on ISA free compartments? From a quick bit of desk research I haven't found anything specific on the ESA inspection or a temporary stop in exports. I can contact the ministry about this if it would be helpful?

Best wishes,
[Redacted]

From: Nina Santi <Nina.Santi@aquagen.no>
Sent: 10 June 2019 23:41
To: [Redacted]trade.gov.uk>
Cc: [Redacted]@mobile.trade.gov.uk>
Subject: SV: AquaGen - Scotland

Dear [Redacted],

Thank you for your kind e-mail. We appreciate that our initiatives in Scotland have been welcomed by both local and central authorities. [Redacted] and I had a good meeting in Oslo, and we briefly discussed one issue that I would like to come back to both of you on.

Currently, the salmon production in Scotland and the trout production in UK are fully relying on egg imports. This makes the production vulnerable, and is one of the reasons we are establishing egg production in Scotland. The planned production this year is however not sufficient to support all the salmon producers in Scotland.

4.1 Salmon egg imports to Scotland come mainly from Norway and Iceland, and the import is regulated by the European Fish Health Directive (Council Directive 2006/88/EC of 24 October 2006 on animal health requirements for aquaculture animals and products thereof, and on the prevention and control of certain diseases in aquatic animals). One of the conditions for export of eggs from Norway to Scotland are that the eggs come from an ISA-free compartment. The ISA-free compartments are declared by the Norwegian Food Safety Authority in the meetings of the Standing Committee on Plants, Animals, Food and Feed (SCOPAFF) after a two year period of surveillance for the disease. Other member states can ask questions or make comments to the declarations before they become valid and the export can commence. The Fish Health Directive is under revision and the new legislation will be implemented in April 2021. The revision of the legislation seem to influence the current work of the commission, as questions arise in connection with new declarations that we previously did not experience.

4.2 During the last year, the declaration of ISA free compartments from Norway has become increasingly difficult, and last week this situation seemed to escalate to another level. We do not have all the information yet, but from our understanding we face a temporary stop in all egg exports to EU from Norway after an ESA inspection earlier this year. The background for this is likely that parts of the regulations are understood differently in the member states. From what I understand some of the concerns leading up to this situation have come from UK. With this in mind, and from the understanding that a stop in egg exports could damage the Scottish salmon production severely, I wanted to raise your attention to this issue.

4.3 As a producer we follow the instructions given by the national authorities, and trust them to give us the right advise. The producers have no voice in the dialogue between the member states, and no direct influence over the current process. So we have to rely on the work of the authorities and politicians to resolve the situation.

4.4 Are there any ways you can assist in this situation? For AquaGen we need to get new genetic material into Scotland to continue the breeding program locally, but this is of less concern. The main issue is that if the salmon farmers in Scotland are short of eggs, the salmon production just stops, nothing less.

4.5 I have the contact information to the persons working with these regulations within the Norwegian Ministry of Trade, Industry and Fisheries if this could be of relevance.

4.6 For further information, you should be aware that there are some important issues related to the aquaculture regulations that are different from other animal health regulations in EU. For most other farmed animals, the trade of genetic material in the form of frozen sperm or embryos are regulated separately from the trade and transport of live animals. In fish the same regulation applies if you send frozen milt or embryos (eyed eggs) as if you send a live fish or even a broodfish. The risk is very much higher with the latter, but this is not considered in the regulations. This can be some of the background for extra concerns raised by the fish health authorities.

4.7 I would like to apologize for contacting you regarding this rather complex matter but I feel we have to do something on behalf of our Scottish customers. They are not fully aware of the situation since last week, and I would rather not alarm them before we have more information.

Best regards

Nina Santi
CEO
Mobile: +47 411 48 138
nina.santi@aquagen.no
www.aquagen.no/en



From: [Redacted] (MARLAB)
Sent: 30 January 2019 15:59
To: <[Redacted]@gov.scot>
Subject: FW: ISA status of Rimstad

For info, copy of written confirmation that Rimstad regained ISA free status

Cheers

[Redacted]

From: [Redacted]@aquagen.no>
Sent: 30 January 2019 14:03
To: [Redacted]@gov.scot>; [Redacted]@aquagen.no>
Subject: RE: ISA status of Rimstad

Hi [Redacted],

Please see email attached.

If you need any further information, please let me know.

Kindest Regards

[Redacted]

Technical Sales Manager

Mobile: [Redacted]

[\[Redacted\]@aquagen.no](mailto:[Redacted]@aquagen.no)

www.aquagen.no



From: [Redacted]@gov.scot
Sent: 30 January 2019 13:25
To: [Redacted]@aquagen.no; [Redacted]@aquagen.no
Subject: ISA status of Rimstad

Hi

I've had a query from the Inspectorate at Cefas about the ISA status of Rimstad following the issues raised during their application to get their disease free status reinstated.

I can't find anything in writing in my emails confirming that the application had been approved and Cefas seem to think that the application is still waiting for approval. There is no process for confirming that an application has passed scrutiny, it is just accepted after 60 days unless serious objections are raised (as Germany did with the Rimstad application).

Do you or anyone at Rimstad have written confirmation from Mattilsynet that the application passed and the site is now declared ISA free, including a date when this was confirmed? I have checked the Mattilsynet web site and the list of areas declared free from ISA hasn't been updated since August 2018.

Thanks

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244[Redacted]

Mob[Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

Attachment

From: [Redacted]@mattilsynet.no>
Sent: 23 November 2018 17:09
To: [Redacted]@aquagen.no>; Nina Santi <Nina.Santi@aquagen.no>
Cc: [Redacted]@nfd.dep.no>; [Redacted]@mattilsynet.no>; [Redacted]@nfd.dep.no>; [Redacted]@mattilsynet.no>; [Redacted]@mattilsynet.no>; [Redacted]@mattilsynet.no>; [Redacted]@mattilsynet.no>
Subject: VS: ISA free declaration Rimstad

Hei alle,

Til orientering. Rimstad-saken har endelig funnet sin løsning.

Heller litt Baileys i kaffen her.

God helg!

[Redacted]

Fra: [Redacted]@ec.europa.eu
Sendt: fredag 23. november 2018 17:59
Til: [Redacted]@mattilsynet.no
Kopi: [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu
Emne: ISA free declaration Rimstad

Dear [Redacted],

I am pleased to inform you that after several exchanges with the veterinary competent authority of France (both written and in person), they finally lifted their serious objective concerns as regards the declaration of Rimstad, which can therefore be considered again an ISA free compartment.

The Standing Committee on PAFF was informed accordingly during its meeting this afternoon by us, where the Commission also shared information on the recent exchanges with the UK and Germany too.

Let me thank you and your colleagues for all your efforts, cooperation with all of us and the countless technical information provided to clarify the measures you put in place in Rimstad

Have a good weekend

Best regards

[Redacted]

Head of Unit



European Commission

DG Health and Food Safety (SANTE)

Directorate G Crisis management in food, animals and plants

Unit G2, Animal health and welfare

Rue

Froissart

101,

B-1049

+ [Redacted]

03/76

Brussels/Belgium

From: [Redacted] (MARLAB)

Sent: 10 January 2019 13:52

To: [Redacted]@aquagen.no>

Subject: RE: Import/Export Stats 2018

Hi [Redacted]

Luckily I put the stats together last week so it's an easy cut and paste job!

Imports of salmon

Stage & origin	2018
Ova	
Iceland	10,119,000
Norway	48,345,000
Republic of Ireland	7,250,000
[Redacted – out of scope]	
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]

Exports of salmon

Stage & destination	2018
Ova	
Netherlands	8,000
Spain	15,000
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]

Imports of rainbow trout (no exports and no imports or exports for other trout species)

Stage & origin	2018
Ova	
Denmark	3,210,000
Northern Ireland	1,060,000
USA	855,000
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]

Let me know if you need any further info

Cheers

[Redacted]

From: [Redacted][@aquagen.no](mailto:[Redacted]@aquagen.no)
Sent: 10 January 2019 13:31
To: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Subject: Import/Export Stats 2018

Afternoon [Redacted],

I forgot to ask yesterday, [Redacted] mentioned that you might be able to point me in the right direction to request import and export stats for 2018 please.
The usual eggs and live fish for salmon and trout.

Thanks

[Redacted]
[Redacted]
Mobile: [Redacted]
[\[Redacted\]@aquagen.no](mailto:[Redacted]@aquagen.no)
www.aquagen.no



From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: Thursday, April 12, 2018 10:32:15 AM
To: [Redacted][@aquagen.no](mailto:[Redacted]@aquagen.no)
Subject: RE: Import / export stats

Hi [Redacted]

[Redacted – out of scope]

Here are the figures for 20017

Salmon imports

Stage & origin	2017
Ova	
Iceland	13,883,000
Norway	37,049,000
Republic of Ireland	7,003,000
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]

Salmon exports

Stage & destination	2017
Ova	
Armenia	21,000
Bulgaria	10,000
Morocco	62,000
Netherlands	6,000
Uzbekistan	240,000
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]
[Redacted – out of scope]	[Redacted – out of scope]

Rainbow trout imports (no exports in 2017)

1. Stage & origin	2017
Ova (000s)	
Denmark	3,518,000
Isle of Man	300,000
Northern Ireland	1,240,000,
Norway	774,000
[Redacted – out of scope]	[Redacted – out of scope]

[Redacted – out of scope]

[Redacted – out of scope]

[Redacted – out of scope]

Cheers

[Redacted]

From: [Redacted][@aquagen.no](mailto:[Redacted]@aquagen.no)
Sent: 12 April 2018 08:18
To: [Redacted] (MARLAB)
Subject: Import / export stats

Hi [Redacted] ... hope all good with you. [Redacted – out of scope]

I'm wondering if you could point me in the right direction to request Scottish import and export stats for 2017 .. the usual eggs and live fish for salmon and trout.

[Redacted – out of scope]

Cheers [Redacted]

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>
Sent: 18 February 2019 14:52
To: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>
Subject: RE: Import of ova from Norway to Inchmore 19 Dec 2018

[Redacted],

Following on from the e-mail below I have drafted the response. How would you like to proceed with this particular case?

Thank you [Redacted],

There is an issue in that the destination on the import certificate is Inverpolly for 2.6 million ova. The certificate should accurately detail the destination and quantity of the export. If due to unforeseen circumstances the destination or other details have changed the certificate should be amended by the official inspector in Norway. If changes are made after the despatch of the consignment then the issue must be discussed with the Inspectorate in Aberdeen.

[Redacted]
Senior Fish Health Inspector
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: +44 (0)1312 [Redacted]
S/B: +44 (0)1312 442500
Mob[Redacted]
Fax: +44 (0)1224 295620
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/marinescotland>

From: [Redacted]@mowi.com>
Sent: 18 February 2019 14:25
To: [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted], Inchmore Hatchery <Manager.InchmoreHatchery@mowi.com>
Subject: RE: Import of ova from Norway to Inchmore 19 Dec 2018

Hi [Redacted],

Please find attached a copy of the health certificate for the eggs at Inchmore.

Any other issues then let me know.

Cheers

[Redacted]

From: [Redacted]@gov.scot
Sent: 18 February 2019 14:14
To: [Redacted]@mowi.com
Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); Manager, Inchmore Hatchery <Manager.InchmoreHatchery@mowi.com>
Subject: Import of ova from Norway to Inchmore 19 Dec 2018

Hello [Redacted],

Following on from an inspection I conducted on 4th February I am writing to request a copy of the certificate for the import of ova from Tveiteveg arriving at Inchmore on the 19th December 2018.

I have spoken to [Redacted] who is on leave but has said you will be able to forward a copy of the required document.

Best regards

[Redacted]
Senior Fish Health Inspector
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Tel: +44 (0)1312 [Redacted]
S/B: +44 (0)1312 442500
Mob:+ [Redacted]
Fax: +44 (0)1224 295620
e: [Redacted]@gov.scot
w: <http://www.gov.scot/marinescotland>

Attachment – Copy of health certificate not provided as relevant information contained within import data. Examples of aquatic animal health certificates have been provided through previous FoI responses – for example FoI/18/01553. Previous responses are available on the Scottish Government website: www.gov.scot/publications/

From: [Redacted] (MARLAB)
Sent: 25 February 2019 16:44
To: [Redacted]@mowi.com>
Cc: [Redacted]@gov.scot>
Subject: RE: Import of ova to Inchmore and Inverpolly

Hi [Redacted]

Thanks you for your email. I just wanted to clarify a couple of points.

The certificate you sent to [Redacted] in relation to the ova laid down at Inchmore on 18 February was certificate number INTRA.NO.2018.0003756 (email attached), but in the email below you state that those ova came in with certificate number INTRA.NO.2018.0003807. Please could you confirm which is the correct certificate.

In the electronic notification system the Norwegian competent authority have issued four certificates for consignments that arrived at Inverpolly at the end of last year.

Date of arrival	Site	Number of ova	Source business	Source site	Certificate number
18/12/2018	Inverpolly	2,600,000	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003756
17/12/2018	Inverpolly	1,285,695	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003806
18/12/2018	Inverpolly	1,314,305	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003807
20/12/2018	Inverpolly	770,000	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003831

From my understanding, the first certificate (INTRA.NO.2018.0003756) was the certificate that was replaced by INTRA.NO.2018.0003806 and INTRA.NO.2018.0003807 as the consignment was due to be split onto two planes. If this is the case, certificate number INTRA.NO.2018.0003756 should be cancelled in Traces as it was replaced. If this is confirmed, please could you contact you supplier to request that this certificate is cancelled as it is no longer valid.

Were the all of the ova from the consignment delivered on the 18th of December unpacked and laid down at Inverpolly or were the boxes redirected to Inchmore unopened. The information we had was that the ova were transferred directly from the airport to Inchmore and were not delivered to Inverpolly.

I'm just trying to be clear on what happened so I can provide you with the correct guidance for any future imports.

Thanks

[Redacted]

From: [Redacted]@mowi.com
Sent: 21 February 2019 09:43
To: [Redacted]@gov.scot
Cc: [Redacted]@gov.scot
Subject: FW: Import of ova to Inchmore and Inverpolly

Hi [Redacted],

I have been discussing the health certification with [Redacted] ([Redacted]) and [Redacted] ([Redacted]) and I would like to confirm the following.

The shipment of eggs to Inverpolly hatchery on the 18th December (INTRA.NO.20180003807) we completed an internal movement from Inverpolly hatchery to Inchmore hatchery a total of 799,988 out of a total of 1,314,305 on the original shipment. This should be on each of the hatcheries movement books Inverpolly out and Inchmore in.

This reason for this internal shipment was we believed that within the 1,314,305 egg shipment we have a proportion of organic eggs that was scheduled to be produced at the Inverpolly hatchery throughout 2019. We only found out that this wasn't the case after the shipment was packed and on its way to Scotland. A decision was made to move 799,988 from this batch to Inchmore where they could be incubated at a reduced temperature and then be used in combination with production eggs taken into Inchmore in February 2019. We then re-order the organic eggs that were then delivered on the 20th December.

Inverpolly hatchery has the original health certificate for this shipment on the 18th December and can be viewed during your next audit.

Date of arrival	Site	Number of ova	Source business	Source site	Certificate number
05/12/2018	Inchmore	1,400,000	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003636
17/12/2018	Inverpolly	1,285,695	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003806
18/12/2018	Inverpolly	1,314,305	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003807
20/12/2018	Inverpolly	770,000	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003831

I hope this clears up any confusion but please give me a call if you wish any further information.

Regards

[Redacted]

From: [Redacted]@mowi.com
Sent: 19 February 2019 19:35
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot); [\[Redacted\]@mowi.com](mailto:[Redacted]@mowi.com)>
Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Subject: RE: Import of ova to Inchmore and Inverpolly

Hi [Redacted],

Sorry for the confusion on the health certificates. I will chase this up tomorrow and get back to you.

Regards

[Redacted]

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 19 February 2019 09:45
To: [\[Redacted\]@mowi.com](mailto:[Redacted]@mowi.com)>; [\[Redacted\]@mowi.com](mailto:[Redacted]@mowi.com)>
Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Subject: Import of ova to Inchmore and Inverpolly

Hi

Following the inspection to Inchmore Hatchery last week I wanted to confirm details of the imports of ova from Norway to Inchmore and Inverpolly at the end of last year.

My colleagues were informed that a number of ova (just under 800,000) destined and certified for Inverpolly were delivered to Inchmore instead on the 19th December 2018 and they were show an electronic copy of a certificate with Inverpolly as the destination instead of Inchmore (certificate number INTRA.NO.2018.0003756 for 2.6 million ova).

I have checked the electronic notification system and there appears to be some confusion about the consignment that arrived on 18/19 December. I recall that this consignment of 2.6 million ova was issued with a single certificate but was going to split over two flights due to the number of boxes. We informed you that each load must have its own certificate and two new certificates were issued by Mattilsynet, both with Inverpolly as the destination. The ova then arrived on a single flight.

The information I have is as follows

Date of arrival	Site	Number of ova	Source business	Source site	Certificate number
05/12/2018	Inchmore	1,400,000	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003636
17/12/2018	Inverpolly	1,285,695	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003806
18/12/2018	Inverpolly	1,314,305	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003807

20/12/2018	Inverpolly	770,000	Marine Harvest Norway	Tveitevåg	INTRA.NO.2018.0003831
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The certificate shown to my colleagues (INTRA.NO.2018.0003756) does not appear in our list of consignments received last year. From my understanding this certificate was replaced with certificates INTRA.NO.2018.0003806 and INTRA.NO.2018.0003807 as the intention had been to split the consignment over two flights. All three of these certificates appear as valid on the electronic notification system implying that a total of 5.2 million ova were sent to Inverpolly on or around 18th December 2018.

Consignments imported into Scotland must be accompanied by a health certificate with the correct destination details. If the site of destination changes after the certificate has been issued and the consignment is in transit, you must contact the Fish Health Inspectorate to agree on a course of action. Ova or fish must not be placed on a site other than the certified destination site without agreement from the Fish Health Inspectorate. In addition, it is an offence under The Trade in Animals and Related Products (Scotland) Regulations 2012 not to retain the original health certificate for at least three years after the date of import.

Please can you confirm the dates, number of ova and certificate numbers imported to Inverpolly and Inchmore at the end of last year and which original certificates you have at which location.

Thank you

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob:+44 [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

From: [Redacted]@gov.scot>

Sent: 04 March 2019 12:07

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>

Subject: FW: Import of ova to Inchmore and Inverpolly

Hi [Redacted],

I am trying to get my Inchmore case signed off but need to add a paragraph about the issue with the health cert. I have drafted as follows;

The health certificates for the import of ova from Norway were checked. The destination on the certificate for the shipment of ova arriving at Inchmore on the 19th of December was Inverpolly not Inchmore. This issue has been referred to the imports team of the Fish Health Inspectorate.

Comments please.

[Redacted]

Senior Fish Health Inspector
Marine Scotland - Science

Scottish Government | Marine Laboratory | 375 Victoria Road| Aberdeen | AB11 9DB

Tel: +44 (0)1312 [Redacted]
S/B: +44 (0)1312 442500
Mob:+44 [Redacted]
Fax: +44 (0)1224 295620
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/marinescotland>

From: [Redacted]@mast.is>
Sent: 20 August 2019 13:19
To: [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>
Subject: RE: Error on certificates?

Oh thanks [Redacted].
That's a mistake and you have right: Nothing has changed at Stofnfiskur.
I will rectify that in TRACES so everything is as it should

Með kveðju, / Best regards;
[Redacted]
[Redacted] / [Redacted] / Office of Animal Health and Welfare

Matvælastofnun / Icelandic Food and Veterinary Authority
Austurvegur 64
800 Selfoss
Iceland
Sími/tel.: (+354) [Redacted]- Fax : (+354) 530 4801 - www.mast.is
GSM: (+354) [Redacted]

-----Original Message-----

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>
Sent: þriðjudagur, 20. ágúst 2019 12:16
To: [\[Redacted\]@mast.is](mailto:[Redacted]@mast.is)>
Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Subject: Error on certificates?

Hi [Redacted]

[Redacted – out of scope]

I have a query about some of the recent certificates we have received. Section II.6 (Gs, BKD etc) seems to have been crossed out in the last few certificates.(copies attached and section highlighted). I am assuming nothing has changed at Stofnfiskur and this has just been an error, but I thought I should check particularly in relation to Gs.

If possible, please could these certificates be reissued/replaced on Traces so that we can demonstrate that it was just an error and I will contact the consignees to let them know.

Thanks

[Redacted]

Technical Manager

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob:+44 [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

From: [Redacted] (MARLAB)

Sent: 23 August 2019 09:32

To: [Redacted]@griegseafood.com

Subject: Certificate for import from Stofnfiskur

Hi [Redacted]

It came to our attention this week that the health certificate that accompanied your ova import from Stofnfiskur on 25/6/19 was incorrectly completed (statements in section II.6 incorrectly scored out). The Competent Authority in Iceland has confirmed that this was a clerical error and there was no change in the health status of Stofnfiskur. They have reissued the certificate in TRACES, the electronic trade notification system.

I have attached a copy of the reissued certificate. Please retain the reissued certificate and a copy of this email along with the original certificate so that they are available during future site inspections. Health certificates must be retained for a minimum of three years.

Thanks

[Redacted]

Technical Manager

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob:+44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

Attachment - Copy of health certificate not provided as relevant information contained within import data. Examples of aquatic animal health certificates have been provided through previous FoI responses – for example FoI/18/01553. Previous responses are available on the Scottish Government website: www.gov.scot/publications/

From: [Redacted] (MARLAB)
Sent: 23 August 2019 09:36
To: [Redacted]@scottishseafarms.com; [Redacted]@scottishseafarms.com
Subject: Certificates for imports from Stofnfiskur

Hi [Redacted]

It came to our attention this week that the health certificates that accompanied your ova imports from Stofnfiskur to Barcaldine on 30/07/19 were incorrectly completed (statements in section II.6 incorrectly scored out). The Competent Authority in Iceland has confirmed that this was a clerical error and there was no change in the health status of Stofnfiskur. They have reissued the certificate in TRACES, the electronic trade notification system.

I have attached copies of the reissued certificates. Please retain the reissued certificates and a copy of this email along with the original certificates so that they are available during future site inspections. Health certificates must be retained for a minimum of three years.

Thanks

[Redacted]
Technical Manager
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob: +44 [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

Attachments - Copies of health certificates not provided as relevant information contained within import data. Examples of aquatic animal health certificates have been provided through previous FoI responses – for example FoI/18/01553. Previous responses are available on the Scottish Government website: www.gov.scot/publications/

From: [Redacted] (MARLAB)
Sent: 23 August 2019 09:37
To: [Redacted]@mowi.com
Subject: Certificate for import from Stofnfiskur

Hi [Redacted]

It came to our attention this week that the health certificate that accompanied your ova import from Stofnfiskur on 13/8/19 was incorrectly completed (statements in section II.6 incorrectly scored out). The Competent Authority in Iceland has confirmed that this was a clerical error and there was no change in the health status of Stofnfiskur. They have reissued the certificate in TRACES, the electronic trade notification system.

I have attached a copy of the reissued certificate. Please retain the reissued certificate and a copy of this email along with the original certificate so that they are available during future site inspections. Health certificates must be retained for a minimum of three years.

Thanks

[Redacted]

Technical Manager

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob: +44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

Attachment - Copy of health certificate not provided as relevant information contained within import data. Examples of aquatic animal health certificates have been provided through previous FoI responses – for example FoI/18/01553. Previous responses are available on the Scottish Government website: www.gov.scot/publications/

From: [Redacted] (MARLAB)

Sent: 23 August 2019 10:01

To: [Redacted]@roslin.ed.ac.uk

Subject: Import from Stofnfiskur

Dar [Redacted]

It came to our attention this week that the health certificates that accompanied your ova and milt imports from Stofnfiskur on 20/08/19 were incorrectly completed (statements in section II.6 incorrectly scored out). The Competent Authority in Iceland has confirmed that this was a clerical error and there was no change in the health status of Stofnfiskur. They have reissued the certificates in TRACES, the electronic trade notification system.

I have attached a copy of the reissued certificates. Please retain the reissued certificates and a copy of this email along with the original certificates so that they are available during future site inspections. Health certificates must be retained for a minimum of three years.

In addition, we did not receive prior notification of these imports or for one earlier this year of 3,000 ova on 28/5/19. I would like to remind you that in accordance with regulation 5 (3b) of The Trade in Animals and Related Products (Scotland) Regulations 2012 the importer or consignee must notify the Scottish Ministers at least 24 hours in advance of the intended arrival of the consignment. This notification should be submitted to the Fish Health Inspectorate and I have attached a copy of the notification form (IMP2) that should be used for the notification.

Please could you complete retrospective notifications for the consignments you have received this year and ensure that notifications are submitted for future consignments.

I noted that one of the consignments you received this week was of milt and the certificate was marked that these were for quarantine. Please could you supply details of the work/research that the milt will be used for.

Thanks

[Redacted]
Technical Manager
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500

Attachments - Copies of health certificates not provided as relevant information contained within import data. Examples of aquatic animal health certificates have been provided through previous FoI responses – for example FoI/18/01553.

Previous responses are available on the Scottish Government website:

www.gov.scot/publications/

From: [Redacted]@gov.scot>
Sent: 20 March 2019 17:58
To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>
Subject: FW: Norwegian Declarations

Please see attached from [Redacted]. If we have any comments we can collate and I am happy to do that then forward on.

The declarations are available here:

https://www.mattilsynet.no/language/english/fish_and_aquaculture/fish_health/declaration_of_areas_free_of_infectious_salmon_anaemia_isa_in_norway.8674

Thanks,
[Redacted]

From: [Redacted]@cefas.co.uk>
Sent: 20 March 2019 17:50
To: [Redacted]@gov.scot>; Redacted@gov.scot
Cc: [Redacted]@cefas.co.uk
Subject: Norwegian Declarations

Dear [Redacted]

Please see the link below to two new Norwegian declarations [Redacted – out of scope]

Trosnavåg

The site is already an approved compartment but the operator now wishes to use pumped sea water for the rearing of its fish using a UV disinfection system which has a redundant second system for backup and they state they will not pump sea water if both UV systems fails. Under Article 50 and Annex V there is no reason why they cannot use such as system and I confess I could see no reason not to support the declaration. However speaking to [Redacted] and [Redacted] last week they informed me that Marine Scotland would not allow such a system to operate as an approved compartment and do not view disinfection plants as secure.

Therefore please can you review the declarartion and let me have comments asap as we need to correlate and submit before the 29th March.

Barstadvik

This is a new declaration which on first reading appears to meet the requirements for an approved compartment and the only issue I have is that the testing does not fully conform with the requirements in 2015/1554 but they have sampled 150 in each year. My reading of it is that this is a brood stock site so acces to the fish is time limited and also restricted to when they have been stripped. I have asked if this is the case and if they have tested all of the stocks or not and I am awaiting a reply.

Again any comments asap as your views are more relevent than ours as your industry may wish to trade with them at some point.

Finally looking at the Norwegian site they have added any additional site since Friday and I will look at this soon and again any comments welcome:

HALL 2 – Sørfjorden stamfiskanlegg

[Redacted – out of scope]

Regards

[Redacted]

[Redacted]

Senior Fish Health Inspector

Barrack Road, Weymouth, Dorset, DT4 8UB, UK

Tel: +44(0) 1305 [Redacted] | Mob: +44(0) [Redacted] | Email:

[\[Redacted\]@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Web: www.gov.uk/cefas/fhi

From: [Redacted]@gov.scot>
Sent: 21 March 2019 13:41
To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;
[Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>
Subject: RE: Norwegian Declarations

Hi

Barstadvik – It is not immediately apparent if all 12 annual inspections have been conducted by the official services. Clarification may be required on how many the official service conducted. The sampling results are slightly confusing, but my Norwegian isn't very good, it looks like they have sampled over 150 annually but this hasn't followed the required testing regime in Decision (EU) 2015/1554 of two sampling in spring and summer of 75 fish. Lab testing is stated as in accordance with OIE-standards but no further details are provided. Stock supplies are stated as ISA free sources since 2016 but no details of sources are provided. This and any targeted surveillance necessary for RTR suppliers may be required.

Hall 2 – The use of a shared grading system opens HALL 2 to potential biosecurity breaches, particularly if any fish return to HALL 2. The level of filtration and UV treatment on water supplies is not provided. Details of any shared access points such as service corridors which could lead to a breach of biosecurity should also be clarified (can't determine from site plan).

Trosnavag – It is concerning that SW is to be used in a FW smolt facility but this should be achievable with adequate biosecurity controls on the water supplies. The details of UV dose or ozone dose would be beneficial to the declaration. Details of any intended targeted surveillance regime and the back-up systems to ensure adequate fish welfare and maintenance of disease status should the UV system or ozone system fail would provide further assurance.

[Redacted]

From: [Redacted]@gov.scot>
Sent: 26 March 2019 11:51
To: [Redacted] SG staff
Cc: [Redacted] SG staff
Subject: FW: Barstadvik Declaration of freedom - ScoPAFF meeting Feb 25th 26th 2019

Further to my email of Wednesday last week and at the request of [Redacted] please see attached further information.

I'm intending to look at this later on this afternoon.

Thanks for comments received so far.

[Redacted]

From: [Redacted]@cefascosco.uk

Sent: 26 March 2019 11:43

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: FW: Barstadvik Declaration of freedom - ScoPAFF meeting Feb 25th 26th 2019

[Redacted]

Can you forward the email to the staff reviewing the approved compartment declaration for 10183 Barstadvik for their consideration.

Thanks

[Redacted]

From: [Redacted]@mattilsynet.no

Sent: 25 March 2019 22:38

To: [Redacted]@defra.gov.uk>; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu;
[Redacted]@ec.europa.eu

Cc: [Redacted]@defra.gov.uk; [Redacted]@cefascosco.uk; [Redacted]@mattilsynet.no;
[Redacted]@mattilsynet.no; [Redacted]@mattilsynet.no

Subject: SV: Barstadvik Declaration of freedom - ScoPAFF meeting Feb 25th 26th 2019

Dear Colleagues,

All broodstock that entered the site 10183 Barstadvik was included in the test regime laid down in Decision EU 2015/1554.

The animals were not tested in 3 and 8 lots - the lots refer to the number of shipments of samples received at the laboratory.

The difference in number of lots from one year to another is caused by a change in the interval between submittal of the samples.

The testing of animals has been performed continuously through each qualifying year to select individuals at risk (fish showing symptoms or newly dead fish).

According to Norwegian legislation, testing is performed by authorized fish health personnel. The Norwegian Food Safety Authority supervises and guides the sampling at each site running a surveillance program for ISA.

Hopefully, this clarifies your matter.

Best regards,

[Redacted]

Veterinary, Senior Adviser

NFSA – Head Office – Fish Health and Welfare Section

Fra: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Sendt: mandag 18. mars 2019 11:00

Til: [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu);
[Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu)

Kopi: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@cefass.co.uk](mailto:[Redacted]@cefass.co.uk)

Emne: Barstadvik Declaration of freedom - ScoPAFF meeting Feb 25th 26th 2019

Dear Sir or Madam,

We have reviewed the two Norwegian declarations recently added to your website (declaration A.06 10183 Barstadvik and A.07 11453 Trosnavag).

We do not envisage any issues with supporting the declaration A.07 11453 Trosnavag.

We would kindly request further clarification for the testing for A.06 10183 Barstadvik as we feel it does not fully conform with Decision EU 2015/1554 although over 150 animals were tested in each of the qualifying years.

We therefore need clarification as to, if all the broodstock that entered the site in these years were tested and why they were tested in 3 lots and 8 lots respectively ?

We would also like to clarify if they had to sample over a restricted time period and if so what this period was.

Could you please clarify, if the testing of the new declarations was done by the competent authority or the company seeking to declare disease freedom for its site?

Grateful for your response and help in the matter

Kind regards,

[Redacted]

Policy Advisor | Aquatic Animal Health | Animal & Plant Health | Department for Environment, Food and Rural Affairs

0208 [Redacted] | 2nd Floor , **Foss House** Kings Pool 1-2, Peasholme Green, **York**, YO1 7PR.

My email has changed recently the address will be [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>

Sent: 28 March 2019 13:34

To: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>;
[Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>

Cc: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>

Subject: RE: Norwegian Declarations

Thanks [Redacted] I've added some comments to yours and present an MS comment below.

Defra also picked up (separately) on [Redacted]'s comment about sampling. My understanding is that all broodstock were tested continuously throughout the year – with a focus on newly dead and fish showing symptoms. But presumably healthy fish were sampled periodically as well and certainly at the end of the cycle? Looking at the sample analysis I calculated results for 460 fish (not all tested by heart and kidney), the summary document suggest 379. Maybe we could have clarity on this. Between October 2016 to May 2018 there appears to be 11 submissions of samples over 9 dates. Presumably samples have been stored before submission and some further detail on this may be beneficial to confirm requirements of 2015/1554 have been met.

Because of the shift in Brexit date we have some further time to look at this. [Redacted] has asked for our contribution by Monday 1st April. Defra have been invited to the AHL expert group on 12 April.

Please get back to me by close tomorrow with any further comments or observations.

Thanks,
[Redacted]

Marine Scotland make the following observations with respect the Norwegian Declarations in relation to freedom from ISA

Barstadvik

- It is not immediately apparent if all 12 annual inspections have been conducted by the official services – could this be clarified?
- Further clarification would be useful confirming the date fish were sampled and the date they were tested with confirmation that any storage of samples meets the conditions of 2015/1554
- We assume all broodstock were tested. What percentage were tested as healthy animals, sick animals, recent dead and any percentage untested?
- Result analysis seems to suggest that 460 animals were tested. The summary sheets suggests 379. Which figure is correct?
- Can you provide further details of the lab testing undertaken?
- What is the ISA free source of stock to the site?

HALL 2

- The use of a shared grading system opens HALL 2 to potential biosecurity breaches, particularly if any fish return to HALL 2 – how is this mitigated against?
- What is the level of filtration and UV treatment on water supplies to the site?
- Details of any shared access points such as service corridors which could lead to a breach of biosecurity should also be clarified (can't determine from site plan).

- The HALL systems are in immediate proximity to one another. It would be beneficial to have confirmation of full biosecurity and that there is no risk of contamination from water, air, and aerosols
- Further detail on the internal hygiene procedures for staff, visitors and equipment would be beneficial. Does this include designated staff and equipment for the areas, if not specify the measures to be employed to mitigate cross contamination risks

Trosnavag

- It is concerning that SW is to be used in a FW smolt facility but this should be achievable with adequate biosecurity controls on the water supplies.
- The details of UV dose or ozone dose would be beneficial to the declaration.
- Details of any intended targeted surveillance regime and the back-up systems to ensure adequate fish welfare and maintenance of disease status should the UV system or ozone system fail would provide further assurance.
- It is beneficial to know the distance to the nearest sea site operation, but what is the distance to the nearest ISA infected area?
- Details of a backup UV system are appreciated and the system appears sophisticated enough to ensure constant recording of UV levels being applied. It is mentioned that testing and proving efficiency of UV disinfection is conducted regularly under the legislation – what is the frequency of this?

All three applications stipulate – *Internal hygienic procedures for staff, visitors and equipment* – it would be good to have more information on what this actually means, especially in relation to the HALL system at Sørfjorden stamfiskanlegg.

From: [Redacted]@gov.scot>

Sent: 29 March 2019 20:22

To: [Redacted]@cefas.co.uk>

Cc: [Redacted]@cefas.co.uk>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Norwegian Declarations

Dear [Redacted]

Marine Scotland makes the following observations with respect the Norwegian Declarations in relation to freedom from ISA:

Barstadvik

- It is not immediately apparent if all 12 annual inspections have been conducted by the official services – could this be clarified?
- Further clarification would be useful confirming the date fish were sampled and the date they were tested with confirmation that any storage of samples meets the conditions of 2015/1554

- We assume all broodstock were tested. What percentage were tested as healthy animals, sick animals, recent dead and any percentage untested?
- Result analysis seems to suggest that 460 animals were tested. The summary sheets suggests 379. Which figure is correct?
- Can you provide further details of the lab testing undertaken?
- What is the ISA free source of stock to the site?

HALL 2

- The use of a shared grading system opens HALL 2 to potential biosecurity breaches, particularly if any fish return to HALL 2 – how is this mitigated against?
- What is the level of filtration and UV treatment on water supplies to the site?
- Details of any shared access points such as service corridors which could lead to a breach of biosecurity should also be clarified (can't determine from site plan).
- The HALL systems are in immediate proximity to one another. It would be beneficial to have confirmation of full biosecurity and that there is no risk of contamination from water, air, and aerosols
- Further detail on the internal hygiene procedures for staff, visitors and equipment would be beneficial. Does this include designated staff and equipment for the areas, if not specify the measures to be employed to mitigate cross contamination risks

Trosnavag

- It is concerning that SW is to be used in a FW smolt facility but this should be achievable with adequate biosecurity controls on the water supplies.
- The details of UV dose or ozone dose would be beneficial to the declaration.
- Details of any intended targeted surveillance regime and the back-up systems to ensure adequate fish welfare and maintenance of disease status should the UV system or ozone system fail would provide further assurance.
- It is beneficial to know the distance to the nearest sea site operation, but what is the distance to the nearest ISA infected area?
- Details of a backup UV system are appreciated and the system appears sophisticated enough to ensure constant recording of UV levels being applied. It is mentioned that testing and proving efficiency of UV disinfection is conducted regularly under the legislation – what is the frequency of this?

All three applications stipulate – *Internal hygienic procedures for staff, visitors and equipment* – it would be good to have more information on what this actually means, especially in relation to the HALL system at Sørfjorden stamfiskanlegg.

Please get in touch if anything is unclear.

Regards,
[Redacted]

Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted]@gov.scot>
Sent: 09 April 2019 16:54
To: [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>
Subject: FW: Norwegian Declarations

[Redacted]

See attached. I think you and I largely provided comments on these declarations:

I think I'm content with [Redacted]'s comments and actions on Barstadvik. We have confirmation that all broodstock were tested and provided that there has been no detriment to sample viability through inadequate storage I think I would be happy with the rest.

In terms of Trosnavag and actions taken in the event of the water disinfection system the [Redacted] has asked if what is in the declaration is sufficient – notably that no sea water will be allowed into the site if all disinfection fails. This information is present in Annex 3 of the declaration, if it can be assured 100% then I would be content. Otherwise I would be largely content with this one too.

I agree with [Redacted]'s comments on Hall 2 regarding the compartments, but if what is achieved is completely independent epidemiological units in terms of disease risk and biosecurity then potentially the different Halls could be classed as independent sites, but agree with the concerns over this.

Let me know if you have any further comments, otherwise I will go back to [Redacted] with the above.

Cheers
[Redacted]

From: [Redacted]@cefas.co.uk
Sent: 09 April 2019 14:12
To: [Redacted]@gov.scot
Cc: [Redacted]@cefas.co.uk
Subject: RE: Norwegian Declarations

Hi [Redacted]

[Redacted – out of scope]

Please look at the my comments on Barstadvik and Trosnavag below and with Barstadvik we obviously have questions about the numbers, storing and time of testing of the samples. The email from [Redacted] makes it clear all bloodstock are tested and it appears to me that the visits and testing are undertaken by approved vets/fish health professionals in Norway but it would be good to get clarification.

With Trosnavag most of your comments appear to be observations and suggestions for more information and are any of the points red lines for you which need answering before we support the declaration or are you happy to support it as it is? Please confirm

I am still working my way through Hall 2 but Article 50 refers to a compartment being one or more farms not part of a farm and i will get back to you on this soon but with shared access etc and part of the site Cat 1 (potential) and part Cat 3 it does not sit comfortably with us.

If it would be better to discuss on the phone let me know and we will sort a time to call.

Thanks

[Redacted]

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 29 March 2019 20:22
To: [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)
Cc: [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Subject: RE: Norwegian Declarations

Dear [Redacted]

Marine Scotland makes the following observations with respect the Norwegian Declarations in relation to freedom from ISA:

Barstadvik

- It is not immediately apparent if all 12 annual inspections have been conducted by the official services – could this be clarified? **Not clear between 7.5 para5 and 6.2 and 5.4 will ask for clarification**
- Further clarification would be useful confirming the date fish were sampled and the date they were tested with confirmation that any storage of samples meets the conditions of 2015/1554 **Good spot will raise**
- We assume all broodstock were tested **confirmed in email attached** . What percentage were tested as healthy animals, sick animals, recent dead and any percentage untested? **Is this relevant if all tested negative not usually a question asked on any declaration.**

- Result analysis seems to suggest that 460 animals were tested. The summary sheets suggests 379. Which figure is correct? **Good spot will raise with point 2**
- Can you provide further details of the lab testing undertaken? **[Redacted] we normally assume the official lab or approved lab stated to be authorised by the CA and stated to be operating to OIE standards is applying the correct test can you give me more specifics on what you want please.**
- What is the ISA free sources of stock to the site? **Will ask**

HALL 2

- The use of a shared grading system opens HALL 2 to potential biosecurity breaches, particularly if any fish return to HALL 2 – how is this mitigated against?
- What is the level of filtration and UV treatment on water supplies to the site?
- Details of any shared access points such as service corridors which could lead to a breach of biosecurity should also be clarified (can't determine from site plan).
- The HALL systems are in immediate proximity to one another. It would be beneficial to have confirmation of full biosecurity and that there is no risk of contamination from water, air, and aerosols
- Further detail on the internal hygiene procedures for staff, visitors and equipment would be beneficial. Does this include designated staff and equipment for the areas, if not specify the measures to be employed to mitigate cross contamination risks

Trosnavag

- It is concerning that SW is to be used in a FW smolt facility but this should be achievable with adequate biosecurity controls on the water supplies.
- The details of UV dose or ozone dose would be beneficial to the declaration. **Will comment**
- Details of any intended targeted surveillance regime and the back-up systems to ensure adequate fish welfare and maintenance of disease status should the UV system or ozone system fail would provide further assurance. **the declaration states no sea water will be allowed into the site if all disinfection fails is this sufficient?**
- It is beneficial to know the distance to the nearest sea site operation, but what is the distance to the nearest ISA infected area? **Will ask**
- Details of a backup UV system are appreciated and the system appears sophisticated enough to ensure constant recording of UV levels being applied. It is mentioned that testing and proving efficiency of UV disinfection is conducted regularly under the legislation – what is the frequency of this? **Will ask?**

References to fish health services?

All three applications stipulate – *Internal hygienic procedures for staff, visitors and equipment* – it would be good to have more information on what this actually means, especially in relation to the HALL system at Sør fjorden stamfiskanlegg.

Please get in touch if anything is unclear.

Regards,
[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted]@gov.scot>
Sent: 10 April 2019 18:07
To: [Redacted]@cefas.co.uk>; [Redacted]@cefas.co.uk>
Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;
[Redacted]@gov.scot>
Subject: RE: Norwegian Declarations

Hello [Redacted]

Thanks for this.

I note your email of yesterday and in general we were content with the comments you made against the points we sent. On the issue of Trosnavag and the restriction of seawater into the site if all disinfection fails then we would consider this to be sufficient if this can be guaranteed with no risk to disease status on system failure.

I will get back to you with comments on the two word documents.

Thanks,
[Redacted]

From: [Redacted]@cefas.co.uk
Sent: 10 April 2019 16:52
To: [Redacted]@gov.scot>; [Redacted]@cefas.co.uk
Subject: Norwegian Declarations

All

Attached are two word documents hopefully summarising our concerns with both declarations and i would be grateful if you can have a read and let me know if its ok or if we need to add or delete anything.

Time limit is 26 April now or when we exit.

Thanks

[Redacted]

[Redacted]

Senior Fish Health Inspector

Barrack Road, Weymouth, Dorset, DT4 8UB, UK

Tel: +44(0) 1305 [Redacted] | Mob: +44(0) [Redacted] | Email:

[\[Redacted\]@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Web: www.gov.uk/cefas/fhi



Attachments



Norwegian
Declaration Hall 2 C



Review of
Norwegian Declarat

From: [Redacted]@gov.scot>

Sent: 15 May 2019 12:28

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;
[Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: FW: Norwegian Approved Compartment Declarations - Barstadvik and Hall
2

Please note the attached from [Redacted], I've not looked at this myself yet.

If anyone has any comments then please let me know.

Attached previous communications on this for reference.

[Redacted]

From: [Redacted]@cefas.co.uk

Sent: 15 May 2019 10:22

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@cefas.co.uk

Subject: FW: Norwegian Approved Compartment Declarations - Barstadvik and Hall
2

[Redacted]

Please see the Norwegian response to our comments on the approved compartment declaration for 10183 Barstadvik and we are still awaiting the comments on the second site Hall 2.

I would be interested in any thoughts or observations you may have on the reply and subsequent withdraw as [Redacted] and myself will be in Brussels on the 6th June for the AHL working group and this may come up in the side-lines.

Regards

[Redacted]

From: [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Sent: 09 May 2019 11:06

To: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)>; [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu)

Cc: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [Redacted][mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Subject: SV: Norwegian Approved Compartment Declarations - Barstadvik and Hall 2

Dear Colleagues,

Please find attached the response from NFSA to UK on the comments and requests regarding the declaration for 10183 Barstadvik.

Please note: due to the fact that some of the samples are selected and handled by the company`s own veterinarians, NFSA does not regard the sampling to comply with (EU) 2017/625, Article 29 and 30.

(EU) 2017/625 is currently not implemented in Norway. Still, NFSA recognizes the concerns regarding independence and impartial handling of samples.

Consequently, NFSA withdraws the declaration for 10183 Barstadvik.

[Redacted]

Veterinary, Senior Adviser

NFSA – Head Office – Fish Health and Welfare Section

Fra: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Sendt: onsdag 1. mai 2019 10:41

Til: [Redacted][@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [Redacted][cefas.co.uk](mailto:[Redacted]@cefas.co.uk)>; [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [Redacted][@ec.europa.eu](mailto:[Redacted]@ec.europa.eu)

Kopi: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Emne: FW: Norwegian Approved Compartment Declarations - Barstadvik and Hall 2

Hello all

In regard to the below request for further information.

We would like to know if you have had opportunity to look at the comments and requests for clarification following the Easter break?

My colleagues would like to consider the declarations in good time and are mindful of the February dates for the Barstadvik declaration that is outstanding.

We are grateful for your assistance in the matter

Regards

[Redacted]

Policy Advisor | Aquatic Animal Health | Animal & Plant Health | Department for Environment, Food and Rural Affairs
0208 [Redacted] 2nd Floor , **Foss House** Kings Pool 1-2, Peasholme Green, **York**, YO1 7PR.

My email has changed recently the address will be [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

From: [Redacted]@defra.gov.uk

Sent: 17 April 2019 09:31

To: [Redacted]@mattilsynet.no; [Redacted]@ec.europa.eu;

[Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu

Cc: [Redacted]@defra.gov.uk; [Redacted]@cefas.co.uk; [Redacted]@cefas.co.uk

Subject: Norwegian Approved Compartment Declarations - Barstadvik and Hall 2

Hello all

With regard to the declarations for Barstadvik and Hall 2 we still have some areas that we would seek further clarification on before we can give them our support and I have attached two word documents with our comments.

25th 26th February 2019- Declaration by Norway of freedom from ISA in an independent compartment comprising the fish farm '10183 Barstadvik'

21st March 2019- Declaration by Norway in relation to freedom compartment comprising "Hall 2" at the Stamfiskanlegg". (MM) from ISA in an independent fish farm "31837 Sørfjorden

We thank [Redacted] and his team for the information we received below and the comments from [Redacted] on March 25th 2019 (email attached for information)

'All broodstock that entered the site 10183 Barstadvik was included in the test regime laid down in Decision EU 2015/1554.

The animals were not tested in 3 and 8 lots - the lots refer to the number of shipments of samples received at the laboratory.

The difference in number of lots from one year to another is caused by a change in the interval between submittal of the samples.

The testing of animals has been performed continuously through each qualifying year to select individuals at risk (fish showing symptoms or newly dead fish).

According to Norwegian legislation, testing is performed by authorized fish health personnel. The Norwegian Food Safety Authority supervises and guides the sampling at each site running a surveillance program for ISA. ‘

Grateful for your assistance and response in the matter

[Redacted]

Policy Advisor | Aquatic Animal Health | Animal & Plant Health | Department for Environment, Food and Rural Affairs
0208 [Redacted] 2nd Floor , **Foss House** Kings Pool 1-2, Peasholme Green, **York**, YO1 7PR.

My email has changed recently the address will be [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Attachment



Reponse from
Norway to UK - Bars

From: [Redacted]@gov.scot>
Sent: 20 June 2019 16:52
To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>
Subject: FW: Norway withdraws the declaration for HALL 2 - Sørfjorden stamfiskanlegg
Importance: High

To note the attached from [Redacted].

[Redacted]

From: [Redacted]@defra.gov.uk
Sent: 20 June 2019 16:40
To: [Redacted]@gov.scot>; [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted]@gov.scot
Cc: [Redacted]@defra.gov.uk
Subject: FW: Norway withdraws the declaration for HALL 2 - Sørfjorden stamfiskanlegg
Importance: High

Hi all,

Please see email about withdrawal of declaration of freedom below.

Regards,

[Redacted] | DrMedVet MRCVS Habilitation | [Redacted] | Future Animal & Public Health, Endemics & Traceability (FAPHET) | Animal & Plant Health | Department for Environment, Food and Rural Affairs | Area 2B, Nobel House, 17 Smith Square, London SW1P 3JR | [Redacted] | mobile [Redacted] | Email: [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk) | For those in Defra: [find me on people finder](#); [FAPHET Organogram](#)

From: [Redacted]@[mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Sent: 20 June 2019 09:02

To: [\[Redacted\]@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [\[Redacted\]@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [\[Redacted\]@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [\[Redacted\]@ec.europa.eu](mailto:[Redacted]@ec.europa.eu); [\[Redacted\]@eftasurv.int](mailto:[Redacted]@eftasurv.int); [\[Redacted\]@eftasurv.int](mailto:[Redacted]@eftasurv.int); [\[Redacted\]@eftasurv.int](mailto:[Redacted]@eftasurv.int); [\[Redacted\]@eftasurv.int](mailto:[Redacted]@eftasurv.int)

Cc: [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted]@nfd.dep.no'; [\[Redacted\]@nfd.dep.no](mailto:[Redacted]@nfd.dep.no); [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [\[Redacted\]@cefasc.co.uk](mailto:[Redacted]@cefasc.co.uk); [\[Redacted\]@cefasc.co.uk](mailto:[Redacted]@cefasc.co.uk); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no); [\[Redacted\]@mattilsynet.no](mailto:[Redacted]@mattilsynet.no)

Subject: Norway withdraws the declaration for HALL 2 - Sørkjorden stamfiskanlegg
Importance: High

Dear Colleagues,

NFSA withdraws the submitted declaration for HALL 2 – Sørkjorden stamfiskanlegg, as an ISA-free compartment.

We would like to thank our colleagues from UK for the review and suggestions on the matter.

Best regards,

[Redacted],
Veterinary, Senior Adviser

NFSA – Head Office – Fish Health and Welfare Section

From: [Redacted]@gov.scot>

Sent: 28 October 2019 17:53

To: [Redacted] SG staff

Subject: FW: ScoPAFF

Hi

Please see attached read out from the ScoPAFF meeting on 24 October. I will provide an update to Ministers tomorrow.

I think from this we can expect that there will be a delay until the end of November (although I note that neither EFTA nor Norway agreed at the end of the meeting to keep the suspension in place until the next ScoPAFF meeting).

We will get the back to office report soon, but I'm not sure this will give any further info than that which is in the word document.

Although we haven't had much in the way of correspondence from industry on this, they are concerned and we can raise at the meeting on 5 November. [Redacted – out of scope]

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



From: [Redacted][\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Sent: 28 October 2019 13:00

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Cc: [Redacted][\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Subject: RE: ScoPAFF

Hi [Redacted],

Yes, I've just been sent the readout from Item AHW A.06 " Information from the Commission concerning the "Final report of the EFTA's Surveillance Authority's mission to Norway from 20 to 29 May 2019 in order to evaluate animal health controls in relation to aquaculture", thanks to the International Team.

Hope that this is helpful for now.

They'll be sending us a full back to office report, soon.

Best,

[Redacted]

Policy Advisor

Aquatic Animal Health | Animal & Plant Health

Department for Environment Food & Rural Affairs

Area 2B Nobel House | 17 Smith Square | London SW1P 3JR

[\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk) | [Redacted]

For those in Defra: [find me on people finder](#); [FAPHET Organogram](#)

[My pronouns are she/her or they/them]

From: <[\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 28 October 2019 12:57
To: [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)
Subject: ScoPAFF

Hi [Redacted]

Are you able to give me a bit of immediate feedback from the SCoPAFF meeting on 24 October before the minutes come out?

I have a stakeholder meeting this afternoon, so anything I can say would be gratefully received.

Best regards

[REDACTED]

[Redacted]

Marine Scotland – Aquaculture, Crown Estate, Recreational Fisheries, EMFF and Europe

Tel: +44 (0)131 244 [Redacted]

E-mail: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Web: <http://www.scotland.gov.uk/marinescotland>

Mail: Scottish Government, 1B North, Victoria Quay, Edinburgh EH6 6QQ



Readout Item
AHW.A.06 - SCoPAF

-----Original Message-----

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 23 November 2019 13:56

To: [Redacted] SG staff

Subject: Marine Aquaculture Policy - 2019 - Norwegian presentation - ScoPAFF 21 November - OVA update - Follow-up EFTA report Norway aquaculture (A26403162)

Hi All

For information.

Attached is a link to a presentation given at ScoPAFF re the EFTA audit of Norway's fish health surveillance regime. It provides an outline of the process they are going through to re-establish the list of ISA free compartments, but no details on when they expect to complete this task (the last suggested deadline being 1 November). Mr Ewing will be in Norway on Monday and Tuesday and will raise with the Fisheries Minister. Once the list is submitted, there will be a process of scrutiny by EFTA.

Best regards

[Redacted]

Attachment – Presentation is publicly available at:
https://ec.europa.eu/food/sites/food/files/animals/docs/reg-com_ahw_20191221_efta-report.pdf

[Redacted – email withheld under 10(5)(e) – internal communications – see response letter for details]

From: [Redacted]@gov.scot
Sent: 15 March 2018 13:15
To: [Redacted]@gov.scot
Cc: [Redacted] SG staff
Subject: FW: Quarantine requirements for third country imports for research

Hi [Redacted]

Sorry to burden you with another trade related issue so quickly after the last – also relating to Hendrix Genetics! (Copied to [Redacted] re sensitivities). Please see the below email from the Fish Health Inspectorate.

I agree with [Redacted]'s interpretation of the legislation (that the movement can't go ahead). You will note that pre aquatic animal health directive (2006/88), we could have permitted this with conditions if we were content to do so. The complicating issue here (amongst others) is the movement from one research institute to the other – or the being made available on the market therefore having to be considered under farming certificate.

I wonder if there is a way this could perhaps be allowed if the onward travel to Cefas wasn't necessary and some of the ova/fish being kept over 60 days so that they can be tested. I tried to phone [Redacted] to discuss today, because I was interested to know why Cefas thought this would be ok to do. It is perhaps an issue of Cefas scientists not speak to Cefas Fish health inspectorate.

I would be grateful for your initial views on this. [Redacted] will be out of the office until next week so we have time to consider. Would it be possible for you to consider and get back to me by mid week next week? I see that this has been an on-going conversation so we might have a bit of wiggle room with response if required.

Happy to discuss further – [Redacted]

Cheers

[Redacted]

From: [Redacted] (MARLAB)
Sent: 14 March 2018 14:08
To: [Redacted]@gov.scot
Subject: Quarantine requirements for third country imports for research

Hi [Redacted]

I have a query regarding the import of fish from third countries for research and require some policy advice.

I have been approached by [Redacted] at Hendrix Genetics who wishes to import farmed Atlantic salmon ova from Chile. The ova are for genetic research to be carried out at the Roslin Institute and Cefas (see research statement and further details in attached email).

<< File: Research_statement_20170712 JP updates.docx >> << Message: RE: Noticias sobre el destino final de embriones en Roslin // Direct contact among parties!! >>

I have been in contact with the Chilean authorities and although the potential farm source of the ova has a history of testing for ISA and Chile is declared free from the other listed diseases, they state that cannot complete the required EU certificate with regard to ISA.

Imports for research are not directly addressed in Directive 2006/88 or Regulation 1251/2008 (trade requirements) and the legislation only refers to imports for farming, relaying, ornamental purposes etc. There is no explicit exemption from the import legislation for imports for research, therefore we apply the certification requirements depending on species being imported (susceptible/non susceptible) and facility type (open/closed).

In this case, as they wish to import susceptible species and intend to move them to another facility, we require the consignment to be accompanied by the certificate for farming.

<< File: TC certificate for farming relaying open ornamental.pdf >>

There is an option in the legislation to import animals that do not meet the certification requirements if quarantine is carried out before export or upon arrival in the EU. Unfortunately for susceptible species this option is only allowed for wild aquatic animals on the farming health certificate, not for farmed aquatic animals (Section II.4 of the health certificate, last statement 'in the case of wild aquatic animals, have been subject to quarantine in accordance with Decision 2008/946').

<< File: Decision 2008 946 EC implementing Council Directive 2006 88EC as regards requirements for quarantine of aquaculture animals.pdf >>

Quarantine is not meant to be permanent for the imported animals, susceptible species must be tested. Fish should be quarantined for a minimum of 60 days (article 13 (1)) and either they or sentinel animals tested to demonstrate freedom before release. The research is being carried out on the early stages and the embryos will be destroyed pre first feeding therefore it is unlikely that that animals will complete the minimum 60 day quarantine period and probably not before transfer of some of the embryos to Cefas.

According to the information that has been provided and our application of the legislation, it does not appear that this import of Atlantic salmon from a farm in Chile for research can go ahead for the following reasons

- There is no exemption from the certification requirements for consignments for research
- As the import is of a susceptible species (Atlantic salmon for ISA) and some of the animals will be transferred to Cefas, the appropriate certificate is that for farming (Part A, annex IV, Regulation 1251/2008)
- The Chilean authorities have stated that they cannot sign the health certificate as the country/compartiment is not approved as free from ISA
- Quarantine before or after importation is allowed, but for susceptible species this is only allowed for wild aquatic animals not farmed.
- Therefore quarantine does not appear to be a viable option to allow the import to proceed.

Are Policy content with our interpretation of the legislation regarding imports of research from third countries and applying the certification requirements for farming which may in some cases prevent imports for research? Before Directive 2006/88, imports for research from third countries were licenced and we could apply our own requirements as long as the consignment was going to be held in a suitable bio-secure facility.

Please call or email if you have any questions. [Redacted] is keen to progress this import so I would appreciate some guidance soon

Thanks

[Redacted]

From: [Redacted]@scottishseafarms.com
Sent: 15 November 2018 13:35
To: [Redacted]@gov.scot>
Cc: [Redacted]@scottishseafarms.com>
Subject: RE: Salmon ova from AquaGen Rimstad

Hi [Redacted]

Thanks very much for letting us know. The eggs should be arriving in Aberdeen on Wednesday 21/11 at 08.05 Barcaldine around 3-4 pm. We will put them in the comphatches the next day.

Let me know what suits you best for paperwork inspection.

Best regards

[Redacted] | **[Redacted] | Scottish Sea Farms Limited**
Barcaldine Hatchery, Barcaldine, Argyll & Bute, UK, PA37 1SE
Tel (+44) [Redacted] Mob (+44) [Redacted]

From: [Redacted]@gov.scot
Sent: 15 November 2018 11:51
To: [Redacted]@scottishseafarms.com
Cc: [Redacted]@scottishseafarms.com>
Subject: RE: Salmon ova from AquaGen Rimstad

Hi [Redacted]

Just a quick follow up on my email from yesterday.

We've received some supplementary information from the Norwegian competent authority that have answered the UKs queries on the application to reinstate the ISA free status of Rimstad. Cefas and are ourselves have informed Defra that we are content so Rimstad's ISA free approval will come into effect on 19th November in time for the ova coming into Barcaldine.

Could you let me know the estimated time of arrival of the ova at Barcaldine and I will arrange to inspect the ova and the health certificate. Will you be unpacking and laying down the ova on Wednesday?

Cheers

[Redacted]

From: [Redacted] (MARLAB)
Sent: 14 November 2018 10:02

To: [Redacted]@scottishseafarms.com'
Cc: [Redacted]@scottishseafarms.com
Subject: Salmon ova from AquaGen Rimstad

Hi [Redacted]

I have received the notifications from [Redacted] for the eggs coming in from AquaGen next Wednesday for Barcaldine.

As you will be aware an application has been submitted to SCoPAFF to reinstate the ISA free status of Rimstad following the detection of ISA last year at the site. There is a 60 day period for Member States to raise any issues with an application and for these to be resolved. Issues have been raised about the application for Rimstad, but not that these have been addressed yet to my knowledge.

The 60 day period for the application ends on 19th November with ova arriving on 21st November. Obviously this is a tight turnaround so I wanted to make sure Scottish Seafarms were aware of the situation in case there are any delays in reinstating the ISA free status of Rimstad. If the ISA free status of the site is not confirmed then the import cannot proceed.

Give me a call or email me if you have any questions. We will probably inspect the consignments on arrival to ensure the health certificates have been correctly completed. Is the consignment arriving at Aberdeen or Glasgow airport? I think I will be in Oban next Wednesday so if the ova are arriving at Glasgow I could inspect them on arrival at Barcaldine.

Thanks

[Redacted]

[Redacted]

Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [Redacted]@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: [Redacted]@scottishseafarms.com>
Sent: 29 June 2018 10:13
To: [Redacted]@gov.scot>
Cc: [Redacted]@gov.scot>
Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted],

Thank you for your email and information on the decision.

Best regards,

[Redacted].

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 29 June 2018 08:38

To: [\[Redacted\]@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)

Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: FW: Request for information under the Environmental Information (Scotland) Regulations 2004

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Dear [Redacted]

Thank you for your communications regarding Fol/18/01553 concerning information on salmon ova imports since 1 January 2017.

As you will be aware, as a public authority Marine Scotland is legally bound to comply with the requirements of the freedom of information regulations, in this case the Environmental Information (Scotland) Regulations 2004 (EIRs) apply. Under the regulations there is a general presumption in favour of the release of information and whilst exemptions exist which can permit information to be withheld, this approach is to be applied in a restrictive manner. We must be requester-blind, which means we must treat everyone equally and we can't consider why they are requesting the information.

We can withhold information only if an exception under the regulation applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. The decision on release remains solely for the public authority holding the information, taking account of any third party views received in so far as they help inform that decision. That said, a third party does not have a veto on disclosure of the information.

Within the EIRs regulation 10(5)(e) exists and this covers the confidentiality of commercial or industrial information where such confidentiality is provided for by law to protect a legitimate economic interest.

On this occasion we will be withholding the information requested which relates to your business interest as we accept the arguments you have put forward in relation to confidentiality of commercial or industrial information.

Thank you for your communications and assistance in dealing with this request.

Regards,

[Redacted]

Marine Scotland – Science

Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

S/B: +44 (0)131 244 2500

Mob:+44 (0) [Redacted]

Fax: +44 (0)1224 295620

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

From: [\[Redacted\]@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)
Sent: 12 June 2018 10:02
To: [Redacted] (MARLAB)
Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004
Importance: High

Dear [Redacted],

Thank you for informing us of the request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Whilst we understand that this consultation is a courtesy, not a statutory obligation, we wish to raise our objection to the release of specific categories of information under 12.—(5) For the purposes of paragraph (1)(a), a public authority may refuse to disclose information to the extent that its disclosure would adversely affect - (e) the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest. Specifically the information categories relating to third party 'Operator' and 'Site of Destination' (Ormsary Hatchery, Landcatch Natural selection Ltd.), 'Source Country' for entries Republic of Ireland as Marine Harvest Ireland are the only supplier in that country and all entries under category 'Number' and 'Source Company', as this information is subject to confidentiality clauses within contractual agreements provided by law between Scottish Sea Farms Ltd., and third party producer or egg supplier respectively and as such the disclosure of the information would invalidate our contractual obligations. This confidentiality is protecting a legitimate economic interest as disclosure this information would reveal company or industrial commercial strategy for production of salmon in freshwater and intellectual property knowhow on commercial strategy of genetic selection programme which is based on an extensive research and development by Scottish Sea Farms Ltd. As such, disclosure would adversely affect the confidentiality and therefore the public interest in disclosure is not outweighed by the public interest in upholding the exception.

We are unable to provide copies of the full contractual agreements based on the same confidentiality restrictions, however extracts of the specific confidentiality clauses are provided below as requested to help with your decision. As you will read, public disclosure of the content of the supply agreement is restricted by contract Law, i.e. 'source company', 'destination site', 'operator' and 'number of eggs' supplied due to the economic value of this Evaluation material of business strategy and as such we further request that this information not be released into the public domain. Should you decide to proceed to publish the information I would gratefully ask for prior notice so that we can honour our contractual obligation to inform our suppliers specifically under clause 7 of the 2) mutual confidentiality agreement in order to make any legal challenge.

Should you require clarification on any of the above please don't hesitate to contact me, and I would appreciate to be informed as to the outcome of your decision.

Best regards,

[Redacted]

Scans of the agreements themselves, as follows:

1. Extract from contractual supply agreement between egg suppliers and SSF:

7. Confidentiality

Both parties agree to treat the agreement and the content as confidential

2. Text of contractual agreement between Aquagen, Landcatch and SSF:

MUTUAL CONFIDENTIALITY

THIS AGREEMENT is made and entered into on 30th

Aqua Gen AS having its principle place of business at P.O. Box 100, 0403 Oslo, Norway, (hereinafter referred to as "Aqua Gen"); and

Landcatch Natural Selection Limited having its principal place of business at Lochgilphead, Argyll PA31 8PE, United Kingdom (hereinafter referred to as "Landcatch");

WHEREAS, Aqua Gen and Landcatch are entering into this Agreement on behalf of Scottish Sea Farms (the "Business"); and

WHEREAS, the parties recognize and agree that the Business must be kept in the strictest of confidence, and in order to protect both parties, their respective businesses and themselves.

NOW, THEREFORE, the parties hereto agree as follows:

1. The parties agree to conduct the Business negotiations confidentially.

2. All information, together with analyses and records prepared by either party or their representatives, and such information, whether furnished before, on or after the date of this Agreement, in written or oral form, or provided in response to a specific inquiry,

violation of this Confidentiality Agreement;, or (iii) be Representatives from a third party who doesn't owe the disclosure relation thereto..

5. Each party agrees to indemnify, defend and hold the other party and its Representatives harmless from and against any losses, claims, damages or expenses incurred by this Agreement by the respective party or its Representatives or its Representatives for all expenses (including legal fees and costs) incurred by the other party. The obligations set forth in this paragraph shall survive the termination or expiration of this Agreement.

6. Each party acknowledges and agrees that the performance of the obligations set forth in this Agreement is a remedy at law and could be irreparably harmed in the event such obligations were not performed in accordance with their specific terms. The parties have agreed that the parties shall be entitled to injunctive relief (without actually showing monetary damages) to prevent breaches of the terms and provisions hereof, in addition to any other remedies available at law or in equity. If either party shall enforce this Agreement through a court of law, it shall be entitled to reasonable legal fees and costs.

7. If either party is legally compelled to disclose information to a third party, the other party shall provide the other party with prompt notice so that the other party may seek a court order for a remedy and/or waive compliance with this Agreement. If such a remedy is not obtained, or if the other party waives compliance with this Agreement, the party shall disclose such information as is legally required and will exercise best efforts to ensure that such information will be accorded confidential treatment.

8. Neither party shall publicize this Agreement or its terms without the prior written consent of the other party. Any confidentiality obligations of the parties which represent a stricter obligation of confidence shall prevail over the terms of this Agreement.

From: [\[Redacted\]@gov.scot](#)

Sent: 07 June 2018 15:22

To: [Redacted] <[\[Redacted\]@scottishseafarms.com](#)>

Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Sp
18/01/2017	Knock Hatchery	Scottish Sea Farms Ltd		
09/02/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		
07/11/2017	Couldoran Incubation Unit	Scottish Sea Farms Ltd		
18/01/2018	Knock	Scottish Sea Farms Ltd		
15/02/2018	Couldoran Incubation Unit	Scottish Sea Farms Ltd		
09/02/2017	Wester Fearn	Highland Salmon Company Ltd	Scottish Sea Farms Ltd	
23/02/2017	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	
30/11/2017	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	
08/12/2017	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	
07/02/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	
01/03/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob: +44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

From: [\[Redacted\]@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)>

Sent: 01 May 2019 18:06

To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>

Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)>

Subject: RE: Freedom of information request - SSF import of ova

Dear [Redacted],

Sorry for my late reply to your email today, I only just received it. I confirm as previously described we consider the release of information relating to SSF with ova (including imports) involving Mowi / Marine Harvest would cause substantial prejudice to confidentiality of commercial information and as such we request this information is exempt from release to the public under 10(5)e of the EIRs.

Best regards,

[Redacted].

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 01 May 2019 14:10

To: [\[Redacted\]@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)

Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: Freedom of information request - SSF import of ova

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Dear [Redacted]

As a follow up to my email of 15 March 2019 and in relation to FoI requests involving 10(5)(e) (substantial prejudice to confidentiality of commercial information) I am emailing to advise you of the following:

The request referred to below for, *Information on Scottish Sea Farms in relation to ova (including imports), mortalities and diseases (including sea lice) since 1 January 2018*, was subject to clarification with the enquirer. We are still awaiting a response regarding this and therefore this request has not been progressed.

We have received a further FoI request concerning *Information on imports of salmon eggs (ova) involving Marine Harvest/Mowi since 1 January 2018*. A response is due to be sent today. Our reply will release ova import data covering all companies who have undertaken such activity so that the redactions applied in relation to 10(5)(e) and SSF will not single out and highlight SSF imports associated with Mowi / Marine Harvest.

I am hoping that you can still confirm the application of 10(5)(e) in with respect to SSF and this type of information.

Many thanks,
[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
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S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620
e: [Redacted]@gov.scot
w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted] (MARLAB)
Sent: 15 March 2019 12:45
To: [Redacted]@scottishseafarms.com
Cc: [Redacted]@gov.scot
Subject: RE: Freedom of information request - SSF import of ova

Dear [Redacted]

Thank you for confirming this.

Just to keep you informed, we replied to the request (FoI/19/00365) on Wednesday 13th March. In the end we released no information with the reply. We concluded that the information relating to imports did not fall within the scope of the request being – information relating to SSF Ltd in relation to the import of ova and disease concerns. The ‘and disease concerns’ bit was crucial because we concluded that the documentation relating to importation was not associated with any ‘disease

concerns'. There is an email communication between [Redacted] on 14 November 2018 which does fall within this scope but this was withheld in its entirety under Regulation 10(5)(e) (substantial prejudice to confidentiality of commercial information).

The applicant replied quickly confirming a request for a review of our application of 10(5)(e) to this case. It was also confirmed that an appeal has been lodged in relation to the application of 10(5)(e) with respect to historical cases handled. Our application of 10(5)(e) will therefore be considered by the Scottish Information Commissioner. We will likely be in contact with you regarding this in due course.

In addition to all of this, the applicant submitted a further FoI request for:- *information on Scottish Sea Farms in relation to ova (including imports), mortalities and diseases (including sea lice) since 1 January 2018*. The information considered out of scope as detailed above is likely to be captured by this request, along with any other import information. Again, we will look to apply regulation 10(5)(e) where appropriate, with your direction. I would expect information relating to mortalities and diseases is captured by our active publication activities but will have to check to confirm.

I will be in touch in due course.

Kind regards,
[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
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S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

From: [\[Redacted\]@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)
Sent: 13 March 2019 14:07
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Cc: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
Subject: RE: Freedom of information request - SSF import of ova

Dear [Redacted],

I confirm the information which is considered commercial and restricted under confidentiality agreements with suppliers is limited to Ova and Fish supplier name, stock type, supplier site, country of origin and number supplied. As part of the previous FOI case review I agreed that the number of ova / fish imported from 3rd countries can be disclosed but without the specific information relating to commercial origin in order to protect the confidential information. Information of origin, stock type, number of fish and destination site relating to Third party contract growing is also protected under confidentiality agreements.

Best regards,

[Redacted].

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 13 March 2019 11:55

To: [Redacted][@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)

Cc: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: Freedom of information request - SSF import of ova

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Dear [Redacted],

Thanks for getting back to me so quickly.

There must be a telephone number missed in one of the communications so I will look into that before releasing the information.

We have redacted the published case material as requested. It would be beneficial if you could confirm exactly the information which relates to commercial confidentiality – I presume that this is just the supplier site and company of any ova imported or provided by a 3rd party – does this relate to fish as well as ova where supplied from out with the company? Also, I think we were withholding information about sites operating on behalf of SSF on a contract growing relationship – but is this just in relation to the import of ova?

Going forwards, we will look to redact this type of information from cases as they are completed and published, but we need to be clear exactly what should be withheld.

Many thanks,

[Redacted]

From: [Redacted][@scottishseafarms.com](mailto:[Redacted]@scottishseafarms.com)

Sent: 13 March 2019 09:28

To: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Subject: RE: Freedom of information request - SSF import of ova

Importance: High

Dear [Redacted],

Thank you for your email notifying us of the information being considered for release. I confirm the information highlighted in red is considered either personal or relating to confidentiality of commercial information and as such we request it to be redacted. I note that the telephone number for my colleague has not been highlighted for redaction which we consider it should be to be the same as for MS personnel. Likewise the information included in the case 2018-0645 relating to name of supplier is considered confidential commercial information and as such we request this information to be removed from the public domain.

Best regards,

[Redacted]

From: [Redacted]@gov.scot

Sent: 12 March 2019 16:05

To: [Redacted]@scottishseafarms.com

Subject: FW: Freedom of information request - SSF import of ova

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Dear [Redacted],

Further to this email communication and my telephone call with you last week, the attached information relating to SSF concerning the request for information on Scottish Sea Farms in relation to the import of ova from Norway and disease concerns since 1 January 2016, is proposed for release.

The sections highlighted in pink are areas to be redacted on the basis of being either personal information or relating to the confidentiality of commercial information. In relation to the later, please confirm with me that you wish to maintain this position in this case.

I should also highlight that case information relating to site inspections at Barcaldine Hatchery Incubation 1 (case 2018-0646) and Barcladine Hatchery Incubation 3 (case 2018-0645) stipulates: *Site fully stocked with one input 27/11/18 from Aquagen, Norway* and that this information has been published on the Marine Scotland web site. If you feel that this information falls under the confidentiality of commercial information then please let me know.

In addition I attach a background note on the ISA status history of Rimstad – the intention was to release this as part of the context to the request and as a follow up to previous suggestions made about the importation of ISA infected ova.

Grateful for your reply concerning the above.

We are due to reply to the request tomorrow – apologies for the short notice.

Kind regards,

[Redacted]

Marine Scotland – Science

Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

S/B: +44 (0)131 244 2500

Mob:+44 (0) [Redacted]

Fax: +44 (0)1224 295620

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted]@scottishseafarms.com

Sent: 14 February 2019 13:31

To: [Redacted]@gov.scot

Subject: RE: Freedom of information request - SSF import of ova

Dear [Redacted]

Thank you for informing us of the request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information associated with ova imports into Barcaldine (and any other additional sites which have imported ova). Whilst we understand that this consultation is a courtesy, not a statutory obligation, we wish to raise our objection to the release of information relating to supplier company, origin, number and date of shipment and destination as exempt under regulation 10(5)(e) of the EIRs (substantial prejudice to confidentiality of commercial information) applies to this information. This exception applies because disclosure of this particular information would, or would be likely to, prejudice substantially the confidentiality of commercial information provided by Scottish Sea Farms and thus cause substantial harm to our commercial interests. A previous request for release of this information was subject to review by the Information Commissioner which considered the exemption to be upheld.

Furthermore we consider disclosure of this information would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect our legitimate economic interest. The information relating to the supply of ova to our sites is under confidentiality clauses with our suppliers in order to protect the legitimate economic interest of both parties.

Should you require clarification on any of the above please don't hesitate to contact me, and I would appreciate to be informed as to the outcome of your decision.

Best regards,

[Redacted].

From: [Redacted]@gov.scot

Sent: 14 February 2019 09:44

To: [Redacted]@scottishseafarms.com

Subject: Freedom of information request - SSF import of ova

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you verify with the sender and know the content is safe. If in doubt please forward to ITSUPPORT@scottishseafarms.com

Dear [Redacted],

For your information I'm drawing your attention to the attached publication made by Scottish Salmon Watch [Game Ova for Scottish Salmon - Deadly disease delays egg imports from AquaGen in Norway](#). An FoI request was received and dealt with covering the subject area of on bio-security and disease risk in relation to the import of salmon ova and lump sucker ova into Scotland for the use on salmon farms. The detailed

request and response is available here: <https://www.gov.scot/publications/foi-18-03773/>

As part of the release of information, documentation covering the detection of ISA in Rimstad (Norway) along with the declaration made by the Norwegian officials to regain disease free status was released. Caught up in this information, which involved discussion between Scottish and central UK governments, was information relating to the potential import of eggs to Barcaldine from Aquagen back in November and with reference to the ability for the Norwegian site to trade in terms of disease status.

The subsequent article was produced by Scottish Salmon Watch.

Following this, a further request for information has been received covering information on Scottish Sea Farms in relation to the import of ova from Norway and disease concerns since 1 January 2016. Whilst some of this request will have been covered by responses to previous requests (from last year), we are still to undertake search activity to capture any additional information which we hold which may be relevant. We will consult with you on the same once this activity has been conducted.

One area which will fall under this new request is the information associated with ova imports into Barcaldine (and any other additional sites which have imported ova). Given the previous discussions around the release of this information I am seeking your opinion over this in relation to any existing confidentiality agreements. Amongst other things, the information would include site and company of origin and destination, the number of ova shipped and the date that the shipment was made. I would be grateful for a written opinion on this from SSF. As I have explained previously, this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <https://www.gov.scot/about/contact-information/how-to-request-information/> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>.

As indicated above we will be in contact with you in due course with any additional information which we hold which may be relevant to the request.

Kind regards,
[Redacted]

From: [Redacted]@gov.scot>

Sent: 24 January 2019 07:26

To: [Redacted]@aquagen.no

Subject: Freedom of Information Request FoI/18/03773 - ova imports, biosecurity and disease risk

Good Morning

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lumpsucker ova into Scotland for the use on salmon farms'.

You have an interest in the information which has been requested because some of this relates to communications held between yourself and Marine Scotland's Fish Health Inspectorate – please see attached. Therefore, I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]

Attached document FoI-18-03773 – EU Aquagen.docx released previously and available at <https://www.gov.scot/publications/foi-18-03773/>

[Redacted]

Marine Scotland – Science

Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

S/B: +44 (0)131 244 2500

Mob:+44 (0) [Redacted]

Fax: +44 (0)1224 295620

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted]@cookeaqua.com

Sent: 07 June 2018 17:11

To: [Redacted] (MARLAB)

Cc: [Redacted] Cooke staff

Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted],

Further to the request below under (Environmental Information (Scotland) Regulations 2004) regarding the release of information in relation to the Import of Atlantic Salmon Ova.

Cooke Aquaculture Scotland Limited strongly feel that the information should be withheld by the Scottish Government, on the grounds of commercial sensitivity. Please see the reasoning below.

The information that you intend to release directly relates to the production of Cooke Aquacultures S1 and S0 smolts for our future production, that will have gone to sea in late 2017 as S0s or will go to sea in 2018/2019 as S1s and S0s. The release of this information has the ability to give our competitors a distinctive market advantage, as it would give them the opportunity to calculate the number of fish that have been put to sea or we intend to put to sea and also know approximately when these fish will be subsequently harvested.

As such Cooke Aquaculture Scotland wish to reiterate our concerns with regards to the release of the said information contained below, due to commercial sensitivity reasons.

Please can you respond to our concerns asap.

Regards

[Redacted]

[Redacted]

Cooke Aquaculture Scotland

Crowness Road, Hatston, Kirkwall, Orkney, KW15 1RG, United Kingdom.

DD +44(0) [Redacted]

T +44 (0)1856876101

M +44 (0) [Redacted]



From: [Redacted]@gov.scot
Sent: 07 June 2018 14:52
To: [Redacted]@cookeaqua.com
Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

This message originated from outside your organization.

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from
16/02/2017	Ardtaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd	
16/02/2017	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Freshwater Ltd
04/04/2017	Furnace Hatchery	Cooke Aquaculture (Freshwater) Ltd	
08/11/2017	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Freshwater Ltd
21/02/2018	Cairndow Hatchery	Lakeland (Cairndow) Ltd	Cooke Aquaculture Freshwater Ltd
27/02/2018	Ardtaraig Hatchery	Cooke Aquaculture (Freshwater) Ltd	
20/03/2018	Cairndow Hatchery	Lakeland (Cairndow) Ltd	
09/03/2017	Rysa Incubation Unit	Rysa Salmon Farm	Cooke Aquaculture Freshwater Ltd
14/02/2018	Wester Fearn	Highland Salmon Company Ltd	Cooke Aquaculture Freshwater Ltd

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]
Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [Redacted]@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: [Redacted]@[cefascos](mailto:cefascos@cefascos.co.uk)
Sent: 28 January 2019 15:33
To: [Redacted]@[defra.gov.uk](mailto:defra@defra.gov.uk); [Redacted]@gov.scot
Cc: [Redacted]@[defra.gov.uk](mailto:defra@defra.gov.uk); [Redacted]@[cefascos](mailto:cefascos@cefascos.co.uk)>; [Redacted]@[cefascos](mailto:cefascos@cefascos.co.uk);
[Redacted]@[cefascos](mailto:cefascos@cefascos.co.uk)>; [Redacted]@[cefascos](mailto:cefascos@cefascos.co.uk); [Redacted]@[defra.gov.uk](mailto:defra@defra.gov.uk)
Subject: RE: Freedom of Information Request FoI/18/03773 - ova imports, biosecurity and disease risk

Hi [Redacted]

In regard to your query concerning the information highlighted as confidential in **doc FoI-18-03773 – Defra – Cefas.docx**. I've reviewed and discussed with [Redacted], who leads on FOI for us, and we cannot see any reason why this should not be included within the FOI response, on the understanding that all information identifying individuals is redacted - as [Redacted] has stated.

[Redacted] is off today, but back in tomorrow if you want to double check with him before giving a final response.

Thank-you
[Redacted]

[Redacted]
[Redacted]
Barrack Road, Weymouth, Dorset, DT4 8UB, UK
Tel: +44(0) 1305 [Redacted] | Email: [\[Redacted\]@cefascos.co.uk](mailto:[Redacted]@cefascos.co.uk)
Web: www.gov.uk/cefascos/fhi



Follow us on:



From: [Redacted]@[defra.gov.uk](mailto:defra@defra.gov.uk)
Sent: 28 January 2019 12:23
To: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Cc: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk);
[Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk);
[Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Subject: FW: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Hi [Redacted],

Many thanks for sending through more details of the Fol request.

I have gone through the attached documents and have the following comments.

In doc Fol-18-03773 – Defra – Cefas.docx,

there is a section clearly highlighted in yellow as confidential.

I think *we would need confirmation from Cefas FHI for sharing this.*

As [Redacted] appear to be both on leave this week, [Redacted], **could you please have a look at this document and let us know your views in releasing this information that is highlighted as confidential?**

Otherwise, I have no concerns about the documents included.

In doc Fol-18-03773 – Defra – Cefas 2.docx,

No concerns re. the information included.

In doc Fol-18-03773 – Defra – Cefas 3.docx

This is official correspondence between Defra and the Commission on the declaration of freedom for the Rimstad site.

Subsequently, the UK administrations did agree to the declaration. So that information would need to be added I suppose?

[Redacted], could you please pull out the email correspondence and send on to [Redacted]?

I have contacted our Scopaff team to ask their advice on sharing correspondence between Defra and the Commission on freedom of disease declarations.

Once we have guidance, I can let you know whether this information would need to be removed.

Best regards,

[Redacted]

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 28 January 2019 11:47

To: [Redacted][defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Cc: [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Subject: RE: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Hello [Redacted]

The exact wording of the request was given to you in my email of 24 January. Here it is again, along with further details, extracted from the applicant's communication:

Please provide information on bio-security and disease risk in relation to the import of salmon ova and lumpsucker ova into Scotland for the use on salmon farms.

In particular, please include any risk assessments of imports from Iceland, Norway and Ireland for infectious diseases, bacteria, viruses, pathogens and other foreign agents.

Please include any documents, emails, import certificates, quarantine protocols and other information where bio-security and disease risks are cited, assessed or referenced.

Please detail any test results for infectious diseases, bacteria, pathogens and viruses including Piscine Orthoreovirus (PRV).

Please include any correspondence and documentation from the Icelandic Food and Veterinary Authority (MAST), Irish Government, Norwegian Government, European agencies, the OIE and other parties in relation to bio-security and disease risk in relation to the import of salmon ova and lumpsucker ova into Scotland for the use on salmon farms.

For your further information we went back to the applicant and narrowed the scope of this request in terms of time scale. It relates to 1 January 2016 and 19 December 2018.

Thanks,
[Redacted]

From: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Sent: 28 January 2019 11:17

To: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)>; [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)>

Cc: [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Subject: RE: Freedom of Information Request FoI/18/03773 - ova imports, biosecurity and disease risk

Hi [Redacted],

Would it be possible to see the exact wording of the request?

Many thanks,

[Redacted]

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 28 January 2019 10:28

To: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Cc: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk)

Subject: RE: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Thanks [Redacted]

That is appreciated.

[Redacted]

From: [Redacted]@defra.gov.uk

Sent: 28 January 2019 10:27

To: [Redacted]@gov.scot

Cc: [Redacted]@defra.gov.uk; [Redacted]@cefas.co.uk; [Redacted]@cefas.co.uk

Subject: FW: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

[Redacted]

[Redacted] has copied me into his reply he sent on Friday with his comments.

[Redacted] will be looking at his today and will respond back as soon as possible.

Thank you

[Redacted]

From: [Redacted]@cefas.co.uk

Date: 25 January 2019 at 12:31:15 GMT

To: "[Redacted]@gov.scot

Subject: FW: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Dear [Redacted]

Thank you for consulting us on this request and if you need more information or clarification I am in the office tomorrow, but on a training course so if you ring my mobile [Redacted] I will get back to you as soon as I can.

[Redacted – out of scope]

With regard to the other two documents which relate to the Rimstad approved compartment declaration I am not aware of the Commission policy on the publishing of any of the comments from the Commission itself or Member States with regard to declarations presented at SCoPAFF. As far as we know they do not appear anywhere in public and we would be interested if you have had feedback from the Commission on this point. Obviously the actual declaration is still available on the Commission and Norwegian websites and having reviewed the attached documents in the short time available this evening I cannot see anything that I would not be prepared to see released.

I would ask the current relevance of including the Rimstad information at this stage because the last correspondence we had on the 19th November 2018 stated that the deceleration was on hold pending a resolution between the Commission, Germany and Norway. Therefore I presume you are

not yet trading with the Rimstad site so it is not bio-security or disease risk in relation to the import of salmon ova.

Regards

[Redacted]

From: [Redacted]@gov.scot

Sent: 24 January 2019 07:32

To: [Redacted]@defra.gov.uk; [Redacted]@defra.gov.uk; [Redacted]@cefas.co.uk;
[Redacted]@cefas.co.uk

Subject: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Good morning,

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lumpsucker ova into Scotland for the use on salmon farms'.

Some information which we received from you falls within the scope of the request, ie communications relating to ISA in Norway (Rimstad) and VHS risk through lumpfish trade. Therefore, I am writing to ask you for your views on whether this information should be disclosed before we make a decision on the request.

Under the terms of regulation 2(2) of the EIRs, information which we hold in confidence having received it from a UK Minister or government department is not held by us for the purposes of FOISA. If you consider that any of the information requested in this case is 'held in confidence', please let us know and provide evidence to support that view. If regulation 2(2) applies, we will refuse the request and advise the applicant to submit a new request to you under the Environmental Information Regulations 2004. Otherwise, as you will be aware, we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views when coming to our decision.

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]

From: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Sent: 28 January 2019 15:19

To: [Redacted][gov.scot](mailto:[Redacted]@gov.scot); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][cefas.co.uk](mailto:[Redacted]@cefas.co.uk); [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Cc: [Redacted][@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

Subject: FW: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

[Redacted]

Please find the attached emails that confirmed our approval of the compartment following the Questions that were raised were answered by Norway.

If you further information sending please ask.

Many thanks

[Redacted]

Policy Advisor | Aquatic Animal Health | Animal & Plant Health | Department for Environment, Food and Rural Affairs

[Redacted] | 2nd Floor , **Foss House** Kings Pool 1-2, Peasholme Green, **York**, YO1 7PR.

My email has changed recently the address will be [\[Redacted\]@defra.gov.uk](mailto:[Redacted]@defra.gov.uk)

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 24 January 2019 07:32

To: [Redacted] Defra and Cefas staff

Subject: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Good morning,

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lump sucker ova into Scotland for the use on salmon farms'.

Some information which we received from you falls within the scope of the request, ie communications relating to ISA in Norway (Rimstad) and VHS risk through lumpfish trade. Therefore, I am writing to ask you for your views on whether this information should be disclosed before we make a decision on the request.

Under the terms of regulation 2(2) of the EIRs, information which we hold in confidence having received it from a UK Minister or government department is not held by us for the purposes of FOISA. If you consider that any of the information requested in this case is 'held in confidence', please let us know and provide evidence to support that view. If regulation 2(2) applies, we will refuse the request and advise the applicant to submit a new request to you under the Environmental Information Regulations 2004. Otherwise, as you will be aware, we can withhold information only if an exception under the EIRs applies to that information and

the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views when coming to our decision.

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]

Attachment – emails – Compartment declaration Rimstad and Questions regarding declaration

From: [Redacted]@cefafas.co.uk>

Sent: 15 November 2018 11:50

To: [Redacted]@defra.gov.uk>

Cc: [Redacted]@defra.gov.uk>; [Redacted]@cefafas.co.uk>; [Redacted]@gov.scot>

Subject: RE: Questions regarding declaration for 18000 Rimstad

Hi [Redacted]

The response from Norway clarifies why the 26 fish were not tested for ISA and, in relation to their assessment of surveillance needs before and after the re-interpretation of the Directive's needs, the explanation is reasonable.

I was somewhat concerned by their statements that the operator was making decisions about which fish were to be sampled, rather than an independent veterinarian or competent authority veterinary inspector but, given that they have now conducted testing on a very large number of broodstock, we think these concerns can be ignored.

I have just spoken with [Redacted] and he has confirmed that the Scots are equally happy with the information supplied and believe that the declaration is acceptable.

We could perhaps note that with plans to introduce rainbow trout to the farm at some future point, it would be necessary to ensure that these and any further salmon introductions were from ISA-free sources.

Regards -[Redacted]

From: [Redacted]@defra.gov.uk

Sent: 15 November 2018 15:07

To: [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu>; [Redacted]@ec.europa.eu;

[Redacted]@defra.gov.uk>

Cc: [Redacted]@defra.gov.uk>; [Redacted]@cefas.co.uk>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: Compartment Declaration Rimstad Norway

Dear all

We thank our colleagues from Norway for the additional information that was provided. Following clarification from Norway from the questions regarding the Rimstad declaration we have sought further advice and are now content with the information supplied and support the declaration.

Yours sincerely,

[Redacted]

From: [Redacted]@mattilsynet.no

Sent: 15 November 2018 10:30

To: [Redacted]@defra.gsi.gov.uk; [Redacted]@gov.scot; '[Redacted]@gov.scot

Cc: [Redacted]@ec.europa.eu>; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu;

[Redacted]@ec.europa.eu>; [Redacted]@defra.gsi.gov.uk; [Redacted]@cefas.co.uk;

[Redacted]@gov.scot; [Redacted]@mattilsynet.no; [Redacted]@mattilsynet.no

Subject: Questions regarding declaration for 18000 Rimstad

Dear Colleagues,

Please find attached note.

Kind regards,

[Redacted]



Norway Approved
Compartment Check regarding declaratic



Questions

Further attached documents Fol-18-03773 Defra - Cefas.docx; Fol-18-03773 Defra - Cefas 2.docx; and Fol-18-03773 Defra - Cefas 3.docx; all released previously and available at <https://www.gov.scot/publications/foi-18-03773/>.

From: [Redacted][@roslin.ed.ac.uk](mailto:[Redacted]@roslin.ed.ac.uk)
Sent: 07 June 2018 19:46
To: [Redacted] (MARLAB)
Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted],
I have no objections to this.
In case it is relevant - we are not a company but rather a university department undertaking academic research.
Thanks,
[Redacted]

[Redacted]
The Roslin Institute
University of Edinburgh
Easter Bush, EH25 9RG
Phone: +44 (0) [Redacted]
Skype: [Redacted]

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 07 June 2018 15:25
To: [Redacted][@roslin.ed.ac.uk](mailto:[Redacted]@roslin.ed.ac.uk)
Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Species	Stage	Number	Source	Country	Source
12/04/2018	Roslin Institute Hatchery	The Roslin Institute	SAL	OVA	3,200	ICE		Stofnf

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob: +44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

From: [Redacted]@gov.scot>

Sent: 24 January 2019 07:28

To: [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu; [Redacted]@ec.europa.eu;

[Redacted]@ec.europa.eu

Subject: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Good Morning

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lump sucker ova into Scotland for the use on salmon farms'.

You have an interest in the information which has been requested because some of this relates to communications held between yourself and Defra (held by Marine Scotland) – please see attached. Therefore, I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]

Attached document Fol-18-03773 – EU Commission.docx released previously and available at <https://www.gov.scot/publications/foi-18-03773/>

[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted]@gov.scot>

Sent: 22 June 2018 12:56

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: FW: Request for information under the Environmental Information (Scotland) Regulations 2004

Hi

I have received a further email from Finfish following my request for supporting evidence regarding their concerns about the release of data to [Redacted] on imports. I'm not sure if this is sufficient evidence, but I will leave this with you to consider.

Thanks

[Redacted]

From: [Redacted]@aol.com

Sent: 22 June 2018 12:46

To: [Redacted] (MARLAB)

Subject: Re: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted],

Thank you for wishing to learn more of our concerns. We are a small/medium sized privately owned, independent, Scottish company. We have been in operation since 1991 and currently have a staff of seven full time employees. Our salmon hatchery is located in a remote part of the West Highlands in a former National Nature Reserve area and we are vulnerable to anyone intent upon interfering with our water supply.

We comply with the requirements of Government agencies and have regular and frequent audits to ensure that we conform to the quality standards of large retail chains, including full traceability of our stock back to the egg source. We also conform to the standards of Freedom Foods where the main concern is the welfare of the fish in our care. There is a wild salmon fishery on the river supplying our hatchery and the riparian owner visits our farm regularly and is aware of the origins of our fish stocks and our farm practices and is on the board of the North West Sutherland Fishery Trust. We are concerned to know who else requires information about our commercial farming business and why they want the information.

We have not suffered outside interference to date but we did have an unannounced visit in April 2014 from a [Redacted] who is known to object in principle to salmon farming. [Redacted] held up and photographed a FOI reply letter against name signage on our entrance gate. The letter apparently related to a recorded SEPA discharge water quality failure by our farm and presumably, if taken out of context, could have been used to create adverse publicity about our farm. He later held a public meeting in nearby Ullapool where militant members of the audience were heard by our staff to express extreme views against fish farming.

Modern salmon farming is a tightly controlled, predictable process of fish production and it is relatively straightforward to extrapolate from the number and origin of salmon eggs the likely fish survival percentage and growth rate which will be achieved by the hatchery producer. Knowledge of the number and size of fish transferred from a hatchery to a sea farm customer allows the future fish growth to market size and likely timing of harvests to be determined. Due to the relatively long farm growth cycle for salmon this is commercially sensitive data which can be used by both competitor farms and by customers for the final fish products. The collation and use of this hatchery data, coupled with data from other sources, will be of market value to our farm competitors and eventually adversely impact the financial returns to the Scottish salmon industry from both export and internal UK markets.

We can see the potential commercial risks to our private limited company of your acceding to this EIR request but have difficulty understanding why our company data is not protected under the law and where the public interest lies in divulging the source hatchery of the imported certified eggs we are rearing, the identity of our farm and the number of salmon eggs in our care.

Kind regards,

[Redacted]

Finfish Limited.
Registered in Scotland No. 130308
Registered Office:
Inverpol
Ullapool,
Ross-shire
IV26 2YB.

-----Original Message-----

From: [Redacted][\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

To: finfishfarms <finfishfarms@aol.com>

Sent: Wed, 13 Jun 2018 12:41

Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

Thank you for the letter.

I note your concerns regarding the release of information in relation to commercial sensitivity. It would benefit us if you could provide further evidence of the harm which could be caused or has been caused from the release or use of similar types of information. This may help support any argument made under this exception.

Firm evidence associated with the release of these types of information would be most beneficial to supporting a case rather than just relaying upon the potential impact, although I appreciate this may not be available.

I will also take forward your point about disclosing the location of the hatchery.

Regards

[Redacted]

From: Finfishfarms [<mailto:finfishfarms@aol.com>]
Sent: 13 June 2018 12:26
To: [Redacted] (MARLAB)
Subject: Re: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted],

Please find attached our reply to your request for our views on whether the information about our hatchery business should be disclosed.

Regards,

[Redacted]
[Redacted]

Finfish Limited.
Registered in Scotland No. 130308
Registered Office:
Inverpolly,
Ullapool,
Ross-shire
IV26 2YB.

-----Original Message-----

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
To: finfishfarms <finfishfarms@aol.com>
Sent: Thu, 7 Jun 2018 14:58
Subject: Request for information under the Environmental Information (Scotland) Regulations 2004
Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Species	Stage	Number	Source Country	Source Company
10/01/2017	Inverpolly	Finfish Ltd	SAL	OVA	2,450,000	NOR	Marine Harvest Norwa
22/03/2017	Inverpolly	Finfish Ltd	SAL	OVA	3,150,000	NOR	Marine Harvest Norwa
04/01/2018	Inverpolly	Finfish Ltd	SAL	OVA	2,600,000	NOR	Marine Harvest Norwa
11/01/2018	Inverpolly	Finfish Ltd	SAL	OVA	87,639	NOR	Marine Harvest Norwa
04/04/2018	Inverpolly	Finfish Ltd	SAL	OVA	2,300,000	NOR	Marine Harvest Norwa

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory

obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>



Redacted - Finfish
response.pdf

From: [\[Redacted\]@glasgow.ac.uk](mailto:[Redacted]@glasgow.ac.uk)

Sent: 07 June 2018 15:05

To: [Redacted] (MARLAB)

Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

I'm happy for this information to be released.

[Redacted]

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Sent: 07 June 2018 14:57

To: [\[Redacted\]@glasgow.ac.uk](mailto:[Redacted]@glasgow.ac.uk)

Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine

Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Species	Stage	Number	Source	Country	Source
14/02/2017	Graham Kerr Building	Glasgow University	SAL	OVA	1,500		ROI	Mari
14/02/2017	Graham Kerr Building	Glasgow University	SAL	OVA	1,000		ROI	Mari
14/02/2017	Graham Kerr Building	Glasgow University	SAL	OVA	500		ROI	Mari

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

From: [\[Redacted\]@griegseafood.com](mailto:[Redacted]@griegseafood.com)

Sent: 08 June 2018 16:29

To: [Redacted] (MARLAB)

Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Hi [Redacted]

None of us here have a problem with the information being disclosed

All the best

[Redacted][Redacted]



Girlsta Hatchery
Girlsta
Shetland
ZE2 9SQ

Office [Redacted]
Mobile: [Redacted]

[\[Redacted\]@griegseafood.com](mailto:[Redacted]@griegseafood.com)
www.griegseafood.no

From: [Redacted]@gov.scot

Sent: 07 June 2018 14:59

To: [Redacted]@griegseafood.com>

Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Species	Stage	Number	Sou
14/03/2017	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)	SAL	OVA	1,700,000	
25/05/2017	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)	SAL	OVA	1,700,000	
08/06/2017	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)	SAL	OVA	1,700,000	
04/10/2017	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)	SAL	OVA	1,500,000	
07/02/2018	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)	SAL	OVA	1,545,000	
08/06/2018	Girlsta Hatchery	Grieg Seafood Shetland Ltd (Hatchery)	SAL	OVA	1,500,000	

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at:

<http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

-----Original Message-----

From: [Redacted]@[lineone.net](mailto:[Redacted]@lineone.net)

Sent: 07 June 2018 15:23

To: [Redacted] (MARLAB)

Subject: Re: Request for information under the Environmental Information (Scotland) Regulations 2004

Good afternoon [Redacted], Hebridean Smolts Ltd is on growing these fish for the Scottish Salmon Company, as a company we didn't import this consignment of Ova, the Scottish Salmon Company did, so thus I think they are the one's that would give consent for this information to be given to any other third party. Any problems [Redacted] just give me a call.

Best regards

[Redacted]

-----Original Message-----

From: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

Date: 07/06/2018 15:00

To: <[\[Redacted\]@lineone.net](mailto:[Redacted]@lineone.net)>

Subj: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018.

Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number
01/02/2017	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company	SAL	OVA	525,000 NOR
15/11/2017	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company	SAL	OVA	918,750 ICE
30/01/2018	Mingarry Hatchery	Hebridean Smolts Ltd	SAL	OVA	656,250 NOR	Salmobreed

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen

AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob: +44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

From: [Redacted]@gov.scot>

Sent: 24 January 2019 07:27

To: [Redacted]@hendrix-genetics.com

Subject: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Good Morning

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lumpsucker ova into Scotland for the use on salmon farms'.

You have an interest in the information which has been requested because some of this relates to communications held between yourself and Marine Scotland's Fish Health Inspectorate – please see attached. Therefore, I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101 | 375, Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 [Redacted]
Fax: +44 (0)1224 295620
e: [Redacted]@gov.scot
w: <http://www.scotland.gov.uk/marinescotland>

Attachment document Fol-18-03773 – Hendrix.docx released previously and available at <https://www.gov.scot/publications/foi-18-03773/>

From: [Redacted]@gov.scot>

Sent: 29 June 2018 08:39

To: [Redacted]@hendrix-genetics.com

Cc: [Redacted]@gov.scot>

Subject: FW: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

Thank you for your communications regarding Fol/18/01553 concerning information on salmon ova imports since 1 January 2017.

As you will be aware, as a public authority Marine Scotland is legally bound to comply with the requirements of the freedom of information regulations, in this case the Environmental Information (Scotland) Regulations 2004 (EIRs) apply. Under the regulations there is a general presumption in favour of the release of information and whilst exemptions exist which can permit information to be withheld, this approach is to be applied in a restrictive manner. We must be requester-blind, which means we must treat everyone equally and we can't consider why they are requesting the information.

We can withhold information only if an exception under the regulation applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. The decision on release remains solely for the public authority holding the information, taking account of any third party views received in so far as they help inform that decision. That said, a third party does not have a veto on disclosure of the information.

Within the EIRs regulation 10(5)(e) exists and this covers the confidentiality of commercial or industrial information where such confidentiality is provided for by law to protect a legitimate economic interest.

On this occasion we will be withholding most of the information requested which relates to your business interest, however we will be releasing information detailed below in Andrea's email which relates to the consignment associated with The Scottish Salmon Company.

Thank you for your communications and assistance in dealing with this request.

Regards,
[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620
e: [Redacted]@gov.scot
w: <http://www.scotland.gov.uk/marinescotland>

From: [Redacted]@hendrix-genetics.com

Sent: 08 June 2018 09:52

To: [Redacted] (MARLAB)

Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted],

I am sure you are aware of the recent press release which was in the National newspaper, basically highlighting the failures in Scottish Government to enforce an import ban on Norwegian eggs. The paper had requested details under FOI from Scottish Government in relation to our own set of circumstances being denied access to the Norwegian market.

Anyway, I am not sure if the below request is linked in anyway to that but if at all possible can we restrict the information you release? Ideally we would not share Site of destination, Operator and Consignee on certificate. The reason we ask for this is we do not want to be used nor seen as the bad guys, we fully support the Scottish industry and indeed respect the Scottish governments decision around Norway. After all we have moved on and no longer have our own broodstock in Scotland.

Let me know what you think?

Regards

[Redacted]

[Redacted]

Atlantic Salmon

T +44 (0)1880 [Redacted]

M +44 (0) [Redacted]

E [Redacted]@hendrix-genetics.com

W www.landcatch.co.uk



Landcatch Natural Selection Ltd
Ormsary Fish Farm, Lochgilphead
Argyll, PA31 8PE, Scotland, UK-EU

From: [Redacted]@gov.scot

Sent: 07 June 2018 15:07

To: [Redacted]@hendrix-genetics.com

Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine

Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number
23/02/2017	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	SAL	OVA	2,2
30/11/2017	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	SAL	OVA	40
08/12/2017	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	SAL	OVA	30
07/02/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	SAL	OVA	1,5
01/03/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	The Scottish Salmon Company	SAL	OVA	57
01/03/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	Scottish Sea Farms Ltd	SAL	OVA	80

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob: +44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>

From: [Redacted][@aol.com](mailto:[Redacted]@aol.com)

Sent: 07 June 2018 16:29

To: [Redacted] (MARLAB)

Subject: Re: Request for information under the Environmental Information (Scotland) Regulations 2004

Happy for you to release the information, [Redacted]. The numbers and dates are correct. All Mhor should be Allt Mor. The consignee was Kames Fish Farming Ltd on all 4 occasions.

Regards

[Redacted]

-----Original Message-----

From: [Redacted]@gov.scot

To: [Redacted]@aol.com

Sent: Thu, 7 Jun 2018 15:06

Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number
09/02/2017	Allt Mhor	JS Salmon Ltd	Kames Fish Farming Ltd	SAL	OVA	350,000
13/11/2017	Allt Mhor	JS Salmon Ltd		SAL	OVA	400,000
09/01/2018	Allt Mhor	JS Salmon Ltd		SAL	OVA	325,000
20/02/2018	Allt Mhor	JS Salmon Ltd	Kames Fish Farming Ltd	SAL	OVA	285,000

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]
Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

From: [Redacted][@marineharvest.com](mailto:[Redacted]@marineharvest.com)
Sent: 13 June 2018 08:10
To: [Redacted] (MARLAB)
Subject: RE: Request for information under the Environmental Information (Scotland) Regulations 2004

Hi [Redacted]

Apologies that I am emailing this response to you, but I am currently in Norway.
Please see attached.

If you have any queries, please get in touch
Regards

[Redacted]
[Redacted]
MARINE HARVEST SCOTLAND LTD

MOBILE: +44 [Redacted]
DIRECT: +44 [Redacted]
MAIL: [\[Redacted\]@marineharvest.com](mailto:[Redacted]@marineharvest.com)
WEB: www.marineharvest.com

OFFICE: Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 07 June 2018 16:18
To: [Redacted][@marineharvest.com](mailto:[Redacted]@marineharvest.com)
Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017

and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Species	Stage	Number
25/01/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	156,000
16/02/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	4,000,000
29/03/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	2,664,900
29/03/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	1,285,100
13/06/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	1,506,000
13/06/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	2,494,000
16/11/2017	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	3,600,000
20/12/2017	Inchmore	Marine Harvest (Scotland) Ltd	SAL	OVA	1,950,000
20/12/2017	Inchmore	Marine Harvest (Scotland) Ltd	SAL	OVA	1,950,000
31/01/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	216,592
07/02/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	1,884,000
08/02/2018	Inchmore	Marine Harvest (Scotland) Ltd	SAL	OVA	2,300,000
18/04/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	3,500,000
16/05/2018	Lochailort Recirculation Hatchery	Marine Harvest (Scotland) Ltd	SAL	OVA	3,800,000
15/05/2018	Inchmore	Marine Harvest (Scotland) Ltd	SAL	OVA	1,300,000

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob:+44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [Redacted]@gov.scot

w: <http://www.gov.scot/Topics/marine>



Redacted -
response from Marii

From: [Redacted]@gov.scot>

Sent: 24 January 2019 07:29

To: foi@marine.ie; institute.mail@marine.ie

Subject: Freedom of Information Request Fol/18/03773 - ova imports, biosecurity and disease risk

Good Morning,

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lump sucker ova into Scotland for the use on salmon farms'.

You have an interest in the information which has been requested because some of this relates to communications held between the Marine Institute and Marine Scotland – please see attached. Therefore, I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itpublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]

Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

Attached document FoI-18-03773 – Marine Institute.docx released previously and available at <https://www.gov.scot/publications/foi-18-03773/>

From: [Redacted]@gov.scot>
Sent: 24 January 2019 07:31
To: [Redacted]@mattilsynet.no; [Redacted]@mattilsynet.no
Subject: Freedom of Information Request FoI/18/03773 - ova imports, biosecurity and disease risk

Good Morning

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on 'bio-security and disease risk in relation to the import of salmon ova and lumpsucker ova into Scotland for the use on salmon farms'.

You have an interest in the information which has been requested because some of this relates to communications held between yourself (Mattilsynet) and Marine Scotland – please see attached. Therefore, I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by close of play on **Friday 25 January 2019**.

I should also inform you that all names and personal information including email, telephone numbers and job titles, which can identify any individual, will be redacted as personal information in line with current procedures.

Many thanks for considering this and I look forward to your response.

Kind regards,

[Redacted]
Marine Scotland – Science
Scottish Government | Marine Laboratory, PO Box 101| 375, Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
S/B: +44 (0)131 244 2500
Mob:+44 (0) [Redacted]
Fax: +44 (0)1224 295620

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.scotland.gov.uk/marinescotland>

Attached documents Fol-18-03773 – Mattilsynet 2018.docx; and Fol-18-03773 – Mattilsynet 2016.docx released previously and available at <https://www.gov.scot/publications/foi-18-03773/>

From: [Redacted][@migdalesmolt.co.uk](mailto:[Redacted]@migdalesmolt.co.uk)
Sent: 14 June 2018 12:30
To: [Redacted] (MARLAB)
Cc: [Redacted] kintailsalmon@gmail.com; [Redacted] Migdale Smolt (kintailhatchery@gmail.com)
Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Hi [Redacted],

As you have explained below, this consultation is a courtesy and we have no veto on information released for public perusal. While Migdale Smolt Ltd has no reason for this information not to be available, it comes with a caveat.

[Redacted – out of scope]

Best Regards,

[Redacted]
Migdale Smolt Ltd
Dornoch Road
Bonar Bridge
Sutherland
IV24 3EB

Tel: [Redacted]
Mob: [Redacted]

From: [Redacted][@gov.scot](mailto:[Redacted]@gov.scot)
Sent: 07 June 2018 15:34
To: [Redacted][@migdalesmolt.co.uk](mailto:[Redacted]@migdalesmolt.co.uk)
Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)	Species	Stage	Number
18/01/2017	Mill Burn (Old Mill)	Kintail Hatchery	Migdale Smolts Ltd	SAL	OVA	2,000,000

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]
Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob:+44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

From: [\[Redacted\]@scottishsalmon.com](mailto:[Redacted]@scottishsalmon.com)
Sent: 08 June 2018 12:52
To: [Redacted] (MARLAB)
Cc: [\[Redacted\]@scottishsalmon.com](mailto:[Redacted]@scottishsalmon.com)
Subject: FW: Request for information under the Environmental Information (Scotland) Regulations 2004
Importance: High

Dear [Redacted]

Thank you for notifying TSSC of the intended release of information on ova imports. We object in the strongest terms to confidential supplier information being available to the public, on the grounds of its extreme commercial sensitivity.

We request confirmation from Marine Scotland that no release of this information will take place.

Regards

[Redacted]

8 Melville Crescent, Edinburgh
Scotland, EH3 7JA
Tel: +44 (0)131 [Redacted]
Mob: +44 (0) [Redacted]
www.scottishsalmon.com



**The Scottish
Salmon Company**
SCOTLAND'S FINEST
Sea Loch Fresh Salmon



From: [Redacted]@gov.scot

Sent: 07 June 2018 15:27

To: [Redacted]@scottishsalmon.com

Subject: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Consignee on certificate (if different from operator)
11/01/2017	Tulloch Hatchery	The Scottish Salmon Company	
15/02/2017	Geocrab Hatchery	The Scottish Salmon Company	
01/03/2017	Geocrab Hatchery	The Scottish Salmon Company	
23/02/2017	Geocrab Hatchery	The Scottish Salmon Company	
09/11/2017	Tulloch Hatchery	The Scottish Salmon Company	
22/11/2017	Kinlochmoidart Hatchery	The Scottish Salmon Company	
15/11/2017	Barvas Hatchery	The Scottish Salmon Company	

01/02/2018	Tulloch Hatchery	The Scottish Salmon Company	
30/01/2018	Barvas Hatchery	The Scottish Salmon Company	
30/01/2018	Amhuinnsuidhe Hatchery	The Scottish Salmon Company	
01/03/2018	Kinlochmoidart Hatchery	The Scottish Salmon Company	
27/02/2018	Geocrab Hatchery	The Scottish Salmon Company	
11/01/2017	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company
01/02/2017	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company
16/02/2017	Kinlochmoidart Hatchery	Sunbeam Aquaculture	The Scottish Salmon Company
15/11/2017	Mingarry Hatchery	Hebridean Smolts Ltd	The Scottish Salmon Company
01/03/2018	Ormsary Hatchery	Landcatch Natural Selection Ltd	The Scottish Salmon Company

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]
Senior Fish Health Inspector
Marine Scotland Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB
Tel: +44 (0)131 244 [Redacted]
Mob: +44 (0) [Redacted]
Fax: +44 (0)131 244 0944
S/B: +44 (0)131 244 2500
e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)
w: <http://www.gov.scot/Topics/marine>

From: [\[Redacted\]@stir.ac.uk](mailto:[Redacted]@stir.ac.uk)
Sent: 08 June 2018 10:14
To: [Redacted] (MARLAB)

Subject: Re: Request for information under the Environmental Information (Scotland) Regulations 2004

Dear [Redacted]

We have no objection to sharing this information.

Thanks

[Redacted] *BVM&S, MSc, PHD, MRCVS*
Professor of Aquatic Population Health and Welfare
Institute of Aquaculture
Faculty of Natural Sciences
University of Stirling
Stirling, Scotland, UK
FK9 4LA
Tel: +44 (0) [Redacted]
Email: [Redacted]@stir.ac.uk

On 7 Jun 2018, at 15:30, [Redacted]@gov.scot wrote:

Dear [Redacted]

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for information on imports of Atlantic salmon ova into Scotland during 2017 and 2018. Through the Trade in Animals and Related Products (Scotland) Regulations 2012, Marine Scotland holds data on the date of import, the company which has imported ova into Scotland, the site the ova were placed onto, the amount, the country of origin and the company of origin.

You have an interest in the information which has been requested because your company is one of those that imported ova during 2017/2018, and the details described above may be released in relation to your company. The information relating to your company is as follows:

Date	Site of destination	Operator	Species	Stage	Number	Source Country
04/01/2017	Temperate Facilities	University of Stirling	SAL	OVA	24,000	NOR
20/02/2018	Niall Bromage Freshwater Field Station	University of Stirling	SAL	OVA	40,000	NOR

I am writing to ask you for your views on whether this information should be disclosed, before we make a decision on the request. Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <http://www.scotland.gov.uk/about/foi> or on the Scottish Information Commissioner's website at: <http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.asp>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by 15 June 2018.

Regards

[Redacted]

Senior Fish Health Inspector

Marine Scotland Science

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen AB11 9DB

Tel: +44 (0)131 244 [Redacted]

Mob: +44 (0) [Redacted]

Fax: +44 (0)131 244 0944

S/B: +44 (0)131 244 2500

e: [\[Redacted\]@gov.scot](mailto:[Redacted]@gov.scot)

w: <http://www.gov.scot/Topics/marine>



T: 0131-244 [Redacted]
E: foi@gov.scot

Mr [Redacted]
Office of Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
KY16 9DS

Your ref: 201900504
Our ref: FOI/18/01553
16 July 2019

Dear [Redacted]

Application for Decision by the Scottish Information Commissioner
Applicant: Scottish Salmon Watch
Department/Agency: MARINE SCOTLAND

Thank you for your letter dated 1 July 2019 relating to Scottish Salmon Watch's request dated 4 June 2019 for information on salmon ova imports since 1 January 2017.

Regulation 10(5)(e) – Confidentiality of commercial or industrial information

I can confirm that we wish to maintain reliance on regulation 10(5)(e) to withhold information containing data on the imports of salmon ova to Scotland relating to Scottish Sea Farms (SSF).

When dealing with the initial request, Marine Scotland contacted all companies that had imported ova into Scotland since 1 January 2017, asking for their views on whether the information we held relating to them should be disclosed. In response, SSF set out their views against disclosing the specific information as they considered that it was excepted under regulation 10(5)(e) of the EIRs (although they incorrectly cited regulation 12(5)(e), which is the equivalent regulation under the EIRs in England). In support of this, SSF gave their reasonings and provided extracts of specific confidentiality clauses within contractual agreements that they have in place with their suppliers and contract growers. A copy of that correspondence is attached below:

[ATTACHMENT PROVIDED ELSEWHERE IN THIS RESPONSE]

We consider that there is a clear commercial nature to this information as it contains details of third party operators and source companies that have imported salmon ova into Scotland and, as detailed above, Scottish Seas Farms have entered into a mutual confidentiality



agreement with Aqua Gen AS, and Landcatch Natural Selection Limited. We believe that this shows that the information concerned is commercially confidential in nature, as it is covered by the terms of this agreement, and thus falls within the scope for assessment under Regulation 10(5)(e).

We believe that disclosure of this information would breach the terms of the confidentiality agreement in place, and cause substantial harm to the interests of SSF. If the information were released it would disclose company or commercial strategy in the production of salmon in freshwater, which would substantially prejudice future production strategies. In their email of 12 June 2018, attached above, SSF stated *"Specifically, the information categories relating to third party 'Operator' and 'Site of Destination' (Ormsary Hatchery, Landcatch Natural selection Ltd.), 'Source Country' for entries Republic of Ireland as Marine Harvest Ireland are the only supplier in that country and all entries under category 'Number' and 'Source Company', as this information is subject to confidentiality clauses within contractual agreements provided by law between Scottish Sea Farms Ltd., and third party producer or egg supplier respectively and as such the disclosure of the information would invalidate our contractual obligations. This confidentiality is protecting a legitimate economic interest as disclosure this information would reveal company or industrial commercial strategy for production of salmon in freshwater and intellectual property knowhow on commercial strategy of genetic selection programme which is based on an extensive research and development by Scottish Sea Farms Ltd."*

In our review response dated 19 September 2018 we provided a further release, which disclosed the number of salmon ova imported, although we continued to withhold the information highlighted within our schedule of information provided to you on 20 May 2019.

We accept that SSF do not have a veto on disclosure, and the final decision on whether information should be released sits with Marine Scotland/Scottish Ministers. However, having taken account of the views expressed by SSF we believe the above shows that the information concerned is confidential, as it is covered by the terms of this agreement.

We recognise that similar information relating to other companies has been released, however this is because those other companies did not object to the release of that information. SSF were the only company to provide evidence of a confidentiality agreement that they had in place with their suppliers and contract growers.

Consideration of the public interest test

We recognise that there is some public interest in release in order to promote openness and transparency, and to inform public debate, as the information relates to aquaculture, which is an industry of some importance to the Scottish economy and therefore may be of interest to some people.

However, we feel that there is a stronger public interest in avoiding significant harm to the commercial interests of Scottish Sea Farms by breaching its confidentiality agreement made between Aqua Gen AS, and Landcatch Natural Selection Limited. The public interest in protecting the confidentiality of companies that deal with the Scottish Government is high. Commercial companies should be able to trust that the Scottish Government can protect confidential information, and not release information that will cause substantial prejudice to their interests. We feel that maintaining this trust, and not damaging the commercial interests of companies that deal with the Scottish Government outweighs the public interest in the release of the information in this case.

Additional release of information

As requested in your further email dated 10 July 2019, attached below is a copy of the information sent to [Redacted] on 17 May 2019:

[ATTACHMENT PASTED AT THE END OF THIS DOCUMENT]

I would be grateful if all the comments provided in italics above, and the contents of the email received from [Redacted] of SSF, dated 12 June 2018 (attached to this submission), were not included in the Commissioner's decision notice, nor shared with the requester or anyone else.

I hope this is sufficient to allow you to conclude your investigations. However, if you require any further information, please do not hesitate to contact me.

Yours sincerely

[Redacted]
FOI Adviser

Attachment

From: [Redacted] (MARLAB)
Sent: 17 May 2019 16:32
To: [Redacted] (salmonfarmingkills@gmail.com)
Subject: Release of further information relating to Fol/18/01553

Dear [Redacted]

REQUEST UNDER THE ENVIRONMENTAL INFORMATION (SCOTLAND) REGULATIONS 2004 (EIRs)

Further to your application to the Scottish Information Commissioner in relation to your request for information on salmon ova imports during 2017 and 2018 (Fol/18/01553), I am writing to advise you that we have now given further consideration to the information held within the scope of your request.

I can confirm that we have reconsidered the information previously withheld and have determined that some of this information can now be disclosed, and a copy of this information is attached. However, a small amount of information is being withheld because an exception under regulation 11(2) of the EIRs (personal information) applies to that information as it is personal data of a third party, and disclosing it would contravene the data protection principles in Article 5(1) of the General Data Protection Regulation and in section 34(1) of the Data Protection Act 2018. We also applied the exception under regulation 11(2) of the EIRs in relation to our original response sent to you in July 2018, please accept my apologies as you were not advised of this in the initial response sent relating to this request.

You will also note that some information has been redacted which is considered to be out of scope of your original request.

Should you have any queries or questions regarding this then please do not hesitate to contact me.

Regards,
[Redacted]



FoI-18-01553 -
Ministerial briefing

