

Email <REDACTED> - Out of scope

From: <REDACTED> <REDACTED>@gov.scot>
Sent: 01 April 2020 13:10
To: <REDACTED> <REDACTED>@gov.scot>
Subject: RE: confirmed positive 2001976

Hi <REDACTED>,

<REDACTED> – Out of scope

Thank you for the info I will discuss with <REDACTED> and then contact <REDACTED> and see if we can get to the bottom of it.

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>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <REDACTED>@gov.scot>
Sent: 01 April 2020 12:53
To: <REDACTED> <REDACTED>@gov.scot>
Subject: RE: confirmed positive 2001976

Hi <REDACTED>

<REDACTED> – Out of scope

The site had been treating with slice but I was told that it had been completed the previous week by the site manager.

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

From: <REDACTED> <REDACTED>@gov.scot>
Sent: 01 April 2020 12:47
To: <REDACTED> <REDACTED>@gov.scot>
Subject: FW: confirmed positive 2001976

Hi <REDACTED>,

<REDACTED> – Out of scope

I have had a positive result for one of your samples from Kyles of Vuia (see attached). I had a quick look on Aquadat and it lists Slice as a recent treatment. Was the site possibly feeding slice while you were there? Or if not do you remember when they had finished the slice treatment?

Thanks,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: +44 (0)131 <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED>
Sent: 03 April 2020 11:11
To: <REDACTED>@vmd.gov.uk>
Subject: FW: confirmed positive 2001976

Good morning <REDACTED>,

Apologies for not copying you into the original e-mail <REDACTED> mentioned she had discussed this with you yesterday. Please see the e-mail below and the attached document for your information and approval.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED>

Sent: 09 April 2020 10:47

To: <REDACTED> <<REDACTED>@vmd.gov.uk>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>;

<REDACTED>@vmd.defra.gsi.gov.uk; <REDACTED> <REDACTED>@vmd.gov.uk>;

<REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>

<REDACTED>@vmd.gov.uk>

Subject: RE: confirmed positive 2001976

Good morning <REDACTED>,

When we received the notification of the positive result for Avermectins I reviewed the summary of product characteristics for SLICE to refresh my memory. I had noted the recommendations in point 4.9 (The paragraph past the “recommended method of incorporation”) where it states that “The recommended maximum number of marine treatments is 5 per 2 year growth cycle and not more than 3 per 12 month period.” For this reason I asked the business how many SLICE treatments the stock have had at the site (please see attached). The site was stocked in February 2019 and the fish have had 6 SLICE treatments in a 12 month period. That is double the recommended number of treatments. Now the question would be whether going over the recommendation in the summary of product characteristics is significant? And would VMD want to pursue this matter with the vet?

We have received all the requested information from the business and I would be happy to provide copies if you would like them. Considering the circumstances at this stage any residues should have diminished to below the MRL and additional testing seems superfluous (this would also pose significant logistical issues due to the current lockdown). Are there any further questions or steps you would like us to take at this stage?

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

Emails <REDACTED> - Out of Scope

From: <REDACTED>
Sent: 03 April 2020 10:30
To: <REDACTED> <REDACTED>@scottishsalmon.com>
Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>
Subject: RE: Kyles of Vuia treatment records

Good morning <REDACTED>,

I hope you are well. I was wondering if it would be possible to provide the requested information to me today. So I can brief the other agencies before the weekend.

I am hoping to also be able to send the result paperwork to you later today.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED>
Sent: 02 April 2020 14:27
To: <REDACTED> <<REDACTED>@scottishsalmon.com>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>
Subject: RE: Kyles of Vuia treatment records

Hi <REDACTED>

That's much appreciated, thank you.

Part of the problem is that we normally work with physical copies. We are trying to get it all sorted out so that we can provide you with digital copies. It's difficult to say how long it will take but I will do my best to get them to you as soon as I possibly can.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <<REDACTED>@scottishsalmon.com>

Sent: 02 April 2020 13:41

To: <REDACTED> <REDACTED>@gov.scot>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>

Subject: Re: Kyles of Vuia treatment records

Hiya,

Ok that's no problem, we will collate and send over as soon as we can.

When would you expect the forms to be with you? Are you able to send them digitally or will they be physical copies sent to the business address?

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 02 April 2020 10:27

To: <REDACTED> <@scottishsalmon.com>

Cc: <REDACTED>@gov.scot

Subject: RE: Kyles of Vuia treatment records

Hi <REDACTED>,

Considering other agencies are involved due to the possible impact on the human food chain it would be very useful if you could supply copies of the treatment record, the veterinary prescription and the veterinary instructions along with a copy of the pertinent movement records for the harvests on the 6th and 30th of March 2020. It would be important to know which cages received the slice treatment and which cages were harvested from.

We are currently awaiting appropriate copies of the forms to send to you with the details for the positive results and I will get that to you ASAP. In total 11 samples were collected from Kyles of Vuia from two pens for different residues. Out of these there was one positive result for Avermectins with the confirmed result of 130 µg/kg with the maximum residue level (MRL) being 100 µg/kg.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector

Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED>@scottishsalmon.com>

Sent: 02 April 2020 08:24

To: <REDACTED> <REDACTED>@gov.scot>

Subject: Re: Kyles of Vuia treatment records

Hiya,

No problem, im collating just now. Are you able to do a screen share so I can show you these records? I can send you an invite to my UC-one room - you don't need any software, you can join my room online.

Are you able to give me any info on the actual VMD results? How many fish sampled, how many returned positive, what levels were the positive?

Ta

<REDACTED>

<REDACTED>

Unit 1, Smithy Lane

Lochgilphead PA31 8TA

Tel: +44 (0)131 718 8500

DD: <REDACTED>

Mob: <REDACTED>

www.scottishsalmon.com

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 02 April 2020 07:30

To: <REDACTED>

Subject: Kyles of Vuia treatment records

Good morning,

Following on from our telephone conversation yesterday I have collated the requirements for the treatment records:

- The name of the product
- The date of administration
- The quantity administered
- The withdrawal period (please also include the date the withdrawal period completed)
- The identification of the animals treated
- The method of administration
- The name of the person who administered the product
- The concentration of the product

Further to the treatment record, as discussed, please provide a copy of the prescription for the slice treatment in February 2020.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector

Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <<REDACTED>@gov.scot>

Sent: 22 April 2020 12:19

To: <REDACTED> <<REDACTED>@vmd.gov.uk>; <REDACTED>

<<REDACTED>@vmd.gov.uk>

Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>

<<REDACTED>@vmd.gov.uk>; <REDACTED> <<REDACTED>@vmd.gov.uk>

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>,

Thank you for that clarification.

At the time the samples were collected the site was stocked with 14 cages, 2 of those cages were sampled for Avermectins. One sample was compliant (RIM 2001975) sampled from pen 13, and one sample was non-compliant (RIM 2001976) sampled from pen 11. Neither of these cages were harvested the following week. Fish that were removed for harvest came from pen 1 and pen 2, so the harvested batches were not sampled. However, to our knowledge all the cages on site have

been treated with SLICE the same number of times (6 times in a 12 month period), which means that the statutory withdrawal period should have been applied to all cages on site. So if the 500 degree days statutory withdrawal period applies then a harvest has taken place from a cage that should have been in withdrawal for SLICE at the time.

Can you please advise how you would like us to proceed in this matter?

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <<REDACTED>@vmd.gov.uk>

Sent: 21 April 2020 17:45

To: <REDACTED> <REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>,

Yes, if the number of treatments is exceeding that as described in the SPC then the 500 degree-day withdrawal period should be applied, as the use isn't in accordance with that approved Marketing Authorisation. My understanding is that the rule on "3 treatments per 12 month period" pertains to the bio accumulative properties of the compound in the salmon.

Apologies if I missed it below, but has it been confirmed that the sampled fish came from a harvest batch – or was it still being reared? I only ask as if it's the latter than it may not be a breach of withdrawal period?

Best wishes,

<REDACTED>

<REDACTED> | *Residues Surveillance Unit* | Operations
Veterinary Medicines Directorate | New Haw, Surrey, KT15 3LS
T: <REDACTED> | E: <REDACTED>@vmd.gov.uk

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 21 April 2020 12:38

To: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>
Cc: <REDACTED>@gov.scot; <REDACTED> <REDACTED>@vmd.gov.uk>;
<REDACTED> <<REDACTED>@vmd.gov.uk>
Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>,

Thank you very much for getting back to me.

It was not point 4.11 we were concerned about but we were seeking clarification on point 4.9 of the SPC.

"The recommended maximum number of marine treatments is 5 per 2 year growth cycle and not more than 3 per 12 month period."

The site was stocked in February 2019 and the fish have had 6 SLICE treatments in a 12 month period.

Can you advise if the statutory withdrawal period should be applied if exceeding the recommended maximum number of marine treatments in a given time period? If so then how should we proceed?

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <REDACTED>@vmd.gov.uk>
Sent: 21 April 2020 11:59
To: <REDACTED> <REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>
Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Morning <REDACTED>,

Our position would be that when the product is used outside the terms of the Marketing Authorisation i.e. a different dosing regimen in this case, then the minimum statutory Cascade withdrawal period should apply – which is 500 degree days.

The Withdrawal Period(s) section of the Slice [SPC](#) states:

4.11 Withdrawal period(s)

Zero days.

To ensure that tissue residues do not exceed the MRL, fish must not be treated more than once in the 60 days prior to the first fish being harvested for human consumption

My understanding from the Safety team here is that the above 60 days stipulation in the SPC pertains to the potential for the compound to accumulate in the target species with repeated exposure/treatment – which is likely why the non-compliant sample was identified as a result of the pattern of use in this scenario.

With regards to a point of contact, it's currently a bit of a collaborative effort until new staffing arrangements are in place for <REDACTED> role – but <REDACTED> and I would be a good first point of contact until then. <REDACTED> and I are looking after the Residues team overall, which currently includes myself, <REDACTED>, <REDACTED>, <REDACTED> and <REDACTED>.

I hope that's helpful, but let us know if you need any more information.

Best wishes,
<REDACTED>

<REDACTED> | Residues Surveillance Unit | Operations
Veterinary Medicines Directorate | New Haw, Surrey, KT15 3LS
T: <REDACTED> | E: <REDACTED>@vmd.gov.uk

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 21 April 2020 09:37

To: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>

Cc: <REDACTED>@gov.scot; <REDACTED> <<REDACTED>@vmd.gov.uk>;
<REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>,

<REDACTED> – Out of scope

There was a further e-mail that I sent on the 9th April after I had received the full records from the business. I have copies of all the records I have requested now and they appear to contain all required information.

However, the outstanding query is what the VMD's policy position is on not following the recommendations in the summary of product characteristics (SPC) regarding the frequency of treatments? Our understanding of the guidance on cascade is that if treatments are administered at a frequency against the recommended guidelines it should be prescribed under cascade? Can you clarify this and whether you believe a 500 degree day withdrawal should have therefore been applied?

Full details are laid out in my e-mail from the 9th of April.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

Email - <REDACTED> – Out of scope

From: <REDACTED>@fss.scot <REDACTED>@fss.scot>

Sent: 23 April 2020 14:14

To: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>

<REDACTED>@vmd.gov.uk>; <REDACTED>@gov.scot; Incidents@fss.scot

Cc: <REDACTED>@gov.scot; <REDACTED>@fss.scot; <REDACTED>

<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>;

<REDACTED> <REDACTED>@vmd.gov.uk>; RiskAssessment@fss.scot

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>

<REDACTED> – Out of Scope

Offhand, I don't know if there are any previous food RAs on avermectins in salmon but I'd tend to agree with you that this is a small non-compliance with no realistic food safety concerns (particularly since avermectins are also used for anti-parasitic treatment in humans). From other emails it looks as if record keeping is OK and my feeling is that as a simple vet med residues non-compliance this would be for VMD/APHA to follow up, rather than a food safety incident per se.

Welcome your thoughts (if you're still accessing your vmd email) - or those of new contacts in VMD.

Regards, <REDACTED>

Note - following coronavirus measures, my office number should transfer to my mobile number and work email below is still valid -

<REDACTED>

<REDACTED>

Food Standards Scotland

Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

<REDACTED>

<REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED> <<REDACTED>@gov.scot>

Sent: 06 April 2020 11:26

To: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>

Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Yes, I saw that when I first looked into it. However, since there is a possibility that different cages were treated differently in preparation for harvest or treatment I was relying on the company providing their records to make sense of it. However, I will follow up with VMD as well.

Thanks,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector

Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED>(MARLAB)

Sent: 06 April 2020 11:23

To: <REDACTED> <REDACTED>@gov.scot>

Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>

I see from the log in sheets that there was a second Avermectin sample collected – 2001975. It might be worth following up with VMD to ask what the result was for that one as it would provide additional information for the investigation.

Cheers

<REDACTED>
Fish Health Inspectorate Technical Manager
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <REDACTED>@gov.scot>
Sent: 06 April 2020 11:10
To: <REDACTED> <REDACTED>@scottishsalmon.com>
Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@scottishsalmon.com>
Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

I am afraid there was a misunderstanding. There were 11 samples collect not 11 fish sampled. I also only get informed of results for positive samples to conduct an investigation. I do not have access to any negative results. The 11 samples will also not all have been for Avermectins. There are a range of different residues that are tested for. You will receive the remaining results in the way you normally receive these results. I believe VMD supply these directly.

I would be grateful if you could supply the documents as discussed today and as soon as possible.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500

Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

Email <REDACTED> - Internal discussions

From: <REDACTED> <<REDACTED>@scottishsalmon.com>
Sent: 07 April 2020 16:05
To: <REDACTED> <<REDACTED>@gov.scot>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@scottishsalmon.com>
Subject: Re: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>

Apologies for the delay. Treatment record, movement record with harvest dates and prescription attached.

Please let me know if you require anything further.

Kind Regards

From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 06 April 2020 11:09
To: <REDACTED>
Cc: <REDACTED>@gov.scot; <REDACTED>
Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

I am afraid there was a misunderstanding. There were 11 samples collect not 11 fish sampled. I also only get informed of results for positive samples to conduct an investigation. I do not have access to any negative results. The 11 samples will also not all have been for Avermectins. There are a range of different residues that are tested for. You will receive the remaining results in the way you normally receive these results. I believe VMD supply these directly.

I would be grateful if you could supply the documents as discussed today and as soon as possible.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector

Marine Scotland - Science

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

Tel: +<REDACTED>

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

Mobile: +<REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED><<REDACTED>@scottishsalmon.com>

Sent: 08 April 2020 12:13

To: <REDACTED>) <<REDACTED>@gov.scot>; <REDACTED>) (MARLAB)

<<REDACTED>@gov.scot>

Cc: <REDACTED><<REDACTED>@scottishsalmon.com>

Subject: Fw: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

The cages that were harvested from were cages 1 & 2.

I will collate the information you have asked for and send through asap.

With regards to the testing for EmBz where treatments last longer than 14 days - the reason this stipulation is on the prescription is to determine whether the fish have reached the minimum effective tissue residue, because there is perhaps more likelihood of some fish not receiving their full dose. In some circumstances, where appetite/health, other treatment or weather interrupt the in-feed treatment, the same amount of prescribed medicated feed is spread over more days - the fish are not fed more medicated feed than is prescribed. The testing is recommended to assure us of an effective treatment after an extended feed period, and help plan further treatment interventions where required.

Warm Regards

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>
Sent: 08 April 2020 11:09
To: <REDACTED>
Cc: <REDACTED>@gov.scot; <REDACTED>
Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

As a matter of urgency we need to know which pens were included in the harvest.
This is priority information to enable Food Standards Scotland to assess the risk to human health. We must have this information today (by return).

From the treatment record you provided it is not clear whether cages were fed the medicated feed every day or alternating days as indicated on the phone. Can you please provide detailed records that show on which days feed was administered? Further, the treatment record indicates the treatment lasted for 15 days and the veterinary instructions stipulate that tissue levels should be tested for emamectin benzoate for any treatment lasting longer than 14 days. Can you confirm whether testing has been conducted? If so, please provide details and results of these tests. This would be particularly pertinent for the pens that were included in the harvest. Could you also please provide details of what biomass and count the harvested pens had and what biomass and count was removed at harvest?

The treatment record you provided is also missing the following: the name of the person administering the treatment (person overseeing the filling of the hopper with the medicated feed) and the withdrawal period.

Further, to understand the possible circumstances of this positive result it is also pertinent to know how many slice treatments the stock at Kyles of Vuia have received in the last 12 months and 24 months.

This is an urgent matter and requires a full response today. I will pass on the details currently available to the relevant agencies.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB
Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@scottishsalmon.com>
Sent: 29 April 2020 11:26
To: <REDACTED> <<REDACTED>@gov.scot>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@scottishsalmon.com>
Subject: Re: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Sorry for the delay getting back you - <REDACTED>

Kyles Vuia had fish input on 30/01/2019, 2/03/2019 & 5/03/2019. All cages have received 6 SLICE treatments since input.

Thanks

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>
Sent: 23 April 2020 15:11
To: <REDACTED>
Cc: <REDACTED>@gov.scot; <REDACTED>
Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Discussions are still ongoing with regards to this result but I just wanted to confirm that all of the stock at Kyles of Vuia was stocked onto the site in February 2019 and that all of the stock have received 6 slice treatments?

Grateful if you could get back to me to confirm the above.

Kind Regards,

<REDACTED>
<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science
Scottish Government | Marine Laboratory | 375 Victoria Road| Aberdeen | AB11 9DB
Tel: <REDACTED>
S/B: +44 (0)131 244 2500

Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> (MARLAB)
Sent: 08 April 2020 16:34
To: <REDACTED> (MARLAB) <REDACTED>@gov.scot>
Subject: FW: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>

We have now received the rest of the information requested from SSC.
<REDACTED> is going to contact VMD to ask for clarification on the multiple SLICE treatments which have been carried out as there have been more than as recommended in the product data sheet.

cheers

<REDACTED>
Fish Health Inspectorate Technical Manager
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@gov.scot>
Sent: 08 April 2020 16:34
To: <REDACTED><<REDACTED>@scottishsalmon.com>
Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@scottishsalmon.com>
Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Thank you very much for providing the requested documents and information.

We will discuss this with VMD and FSS and we will be in touch if we require any further information.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED> @scottishsalmon.com>

Sent: 08 April 2020 15:35

To: <REDACTED> <REDACTED>@gov.scot>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@scottishsalmon.com>

Subject: Re: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Please see attached, as requested:

- **Daily feed record** - please note this report reflects kg of actual feed, whilst the treatment report submitted yesterday reports amount of SLICE/active ingredient.

- **Pre harvest biomass & count** - cages 1 & 2

- **Harvest Records** - cages 1 & 2

- **Treatment Record w/ Withdrawal period** - please note that the withdrawal period is prescribed as zero, and therefore this section is blank in FishTalk, because there is no withdrawal period

- **SLICE treatments** - 6 treatments administered during the 19S1 cycle (input Feb 2019)

- <REDACTED> is responsible for overseeing all treatments. The logistics of feeding SLICE means that multiple site staff will be involved in loading hoppers and feeding the fish, and we do not keep digital records of this. <REDACTED> has ultimate responsibility for administration.

Finally, for further clarification on the statement regarding tissue residue sampling. The veterinary instruction stipulates that treatments that take place over more than 14 days should be sampled to check for flesh residue. To be clear, an extended treatment with the

same total treatment amount does not increase the risk that flesh residues will be higher than intended, conversely it is a greater concern that effective flesh levels to achieve sealice clearance may not have been reached. The rationale for this stipulation is to ensure that a top-up or additional treatment may be arranged if tissue levels were not high enough. Given that on this occasion with a larger site biomass, a further top-up will not have been possible due to CAR licence constraint, it would not have been useful to do additional testing from this point of view and it was not done. From the point of view of testing medicine residue for food safety reasons, given that the withdrawal period is zero and that these fish were not harvested for over 2 weeks after the treatment, it would not have been considered at the time that flesh residue testing was required, and it is not regular practice nor a regulatory requirement to do this. It is well understood that the tissue half-life of EMBZ is around ~15days, which suggests that even an outlier within the population should reduce its flesh levels fairly quickly to below MRL and almost certainly within 2 weeks.

I believe everything you have asked for is in the attached sheets, but please let me know if there is anything else you require.

Kind Regards

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 08 April 2020 11:09

To: <REDACTED>

Cc: <REDACTED>@gov.scot; <REDACTED>

Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Thank you for sending these through. However some of the information I requested is missing.

As a matter of urgency we need to know which pens were included in the harvest. This is priority information to enable Food Standards Scotland to assess the risk to human health. We must have this information today (by return).

From the treatment record you provided it is not clear whether cages were fed the medicated feed every day or alternating days as indicated on the phone. Can you please provide detailed records that show on which days feed was administered? Further, the treatment record indicates the treatment lasted for 15 days and the veterinary instructions stipulate that tissue levels should be tested for emamectin benzoate for any treatment lasting longer than 14 days. Can you confirm whether testing has been conducted? If so, please provide details and results of these tests. This would be particularly pertinent for the pens that were included in the harvest. Could you also please provide details of what biomass and count the harvested pens had and what biomass and count was removed at harvest?

The treatment record you provided is also missing the following: the name of the person administering the treatment (person overseeing the filling of the hopper with the medicated feed) and the withdrawal period.

Further, to understand the possible circumstances of this positive result it is also pertinent to know how many slice treatments the stock at Kyles of Vuia have received in the last 12 months and 24 months.

This is an urgent matter and requires a full response today. I will pass on the details currently available to the relevant agencies.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science
Scottish Government | Marine Laboratory | 375 Victoria Road| Aberdeen | AB11 9DB
Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <REDACTED>@scottishsalmon.com>

Sent: 07 April 2020 16:05

To: <REDACTED> <REDACTED>@gov.scot>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@scottishsalmon.com>

Subject: Re: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

Apologies for the delay. Treatment record, movement record with harvest dates and prescription attached.

Please let me know if you require anything further.

Kind Regards

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 06 April 2020 11:09

To: <REDACTED>

Cc: <REDACTED>@gov.scot; <REDACTED>

Subject: RE: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

I am afraid there was a misunderstanding. There were 11 samples collect not 11 fish sampled. I also only get informed of results for positive samples to conduct an investigation. I do not have access to any negative results. The 11 samples will also not all have been for Avermectins. There are a range of different residues that are tested for. You will receive the remaining results in the way you normally receive these results. I believe VMD supply these directly.

I would be grateful if you could supply the documents as discussed today and as soon as possible.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector

Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED>@scottishsalmon.com>

Sent: 06 April 2020 10:26

To: <REDACTED> <REDACTED>@gov.scot>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED>

<REDACTED>@scottishsalmon.com>

Subject: Re: Kyles of Vuia positive VMD result paperwork

Hi <REDACTED>,

thanks for this - can we get a record of the other sample results? You mentioned there were 11 fish sampled, what were the levels in the other 10 fish please?

Warm Regards

<REDACTED>

<REDACTED>

Unit 1, Smithy Lane
Lochgilphead PA31 8TA
Tel: +44 (0)131 718 8500
DD: <REDACTED>
Mob: <REDACTED>
www.scottishsalmon.com

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 06 April 2020 10:21

To: <REDACTED>

Cc: <REDACTED>@gov.scot

Subject: Kyles of Vuia positive VMD result paperwork

Dear <REDACTED>,

As discussed on the phone and via e-mail please find attached the result paperwork from the labs regarding the positive sample at Kyles of Vuia (FS0927). I will be in touch once we have received and reviewed the documents I have requested.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science
Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB
Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED>(MARLAB)

Sent: 07 April 2020 15:43

To: <REDACTED>(MARLAB) <REDACTED>@gov.scot>

Cc: <REDACTED> <<REDACTED>@gov.scot>

Subject: Kyles of Vuia requests for records

Hi <REDACTED>

As discussed, here's the detail of which records have been requested (in the one titled Kyles of Vuia treatment records). Also attached are copies of the result paperwork and an email from FSS on what additional information may be required, dependent on whether the harvests have included the affected batch.

Cheers

<REDACTED>

Fish Health Inspectorate Technical Manager
Marine Scotland - Science

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

Tel: <REDACTED>

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

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED>@gov.scot>

Sent: 09 April 2020 10:47

To: <REDACTED> <REDACTED>@vmd.gov.uk>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>;

<REDACTED>@vmd.defra.gsi.gov.uk; <REDACTED> <REDACTED>@vmd.gov.uk>;

<REDACTED> <<REDACTED>@vmd.gov.uk>; <REDACTED>

<REDACTED>@vmd.gov.uk>

Subject: RE: confirmed positive 2001976

Good morning <REDACTED>,

When we received the notification of the positive result for Avermectins I reviewed the summary of product characteristics for SLICE to refresh my memory. I had noted the recommendations in point 4.9 (The paragraph past the "recommended method of incorporation") where it states that "The recommended maximum number of marine treatments is 5 per 2 year growth cycle and not more than 3 per 12 month period." For this reason I asked the business how many SLICE treatments the stock have had at the site (please see attached). The site was stocked in February 2019 and the fish have had 6 SLICE treatments in a 12 month period. That is double the recommended number of treatments. Now the question would be whether going over the recommendation in the summary of product characteristics is significant? And would VMD want to pursue this matter with the vet?

We have received all the requested information from the business and I would be happy to provide copies if you would like them. Considering the circumstances at this stage any residues should have diminished to below the MRL and additional testing seems superfluous (this would also pose significant logistical issues due to the current lockdown). Are there any further questions or steps you would like us to take at this stage?

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

Email <REDACTED> - Internal discussions

From: <REDACTED> <<REDACTED>@gov.scot>

Sent: 23 April 2020 15:51

To: <REDACTED> <<REDACTED>@vmd.gov.uk>; FSS Incidents Mailbox
<Incidents@fss.scot>

Cc: <REDACTED> (<REDACTED>) <<REDACTED>@fss.scot>; <REDACTED>
<REDACTED>@fss.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>;
<REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>

Yes, the positive sample was from cage/pen 11 which is down on the treatment record in the column labelled "Fish group Unit" as KV 11.

<REDACTED> - Out of Scope

Kind regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 23 April 2020 15:30
To: <REDACTED> <<REDACTED>@gov.scot>; FSS Incidents Mailbox
<Incidents@fss.scot>
Cc: <REDACTED> <<REDACTED>@fss.scot>; <REDACTED>
<<REDACTED>@fss.scot>; <REDACTED>) (MARLAB) <<REDACTED>@gov.scot>;
<REDACTED><<REDACTED>@vmd.gov.uk>;
<REDACTED><<REDACTED>@vmd.gov.uk>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Afternoon all,

We've been discussing this finding with colleagues from the VMD Safety and Enforcement Teams today and hope to have our final thinking over to you later today.

Just to double-check my understanding of the treatment/harvest records <REDACTED>, am I correct that the non-compliant sample was taken from group KV11? As the sample was from a non-harvested batch the primary issue for us would be the deviation from the product SPC with regards to treatment frequency and pattern of use.

Best wishes,
<REDACTED>

<REDACTED> | *Residues Surveillance Unit* | Operations
Veterinary Medicines Directorate | New Haw, Surrey, KT15 3LS
T: +<REDACTED> | E: <REDACTED>@vmd.gov.uk

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>
Sent: 23 April 2020 15:24
To: Incidents@fss.scot
Cc: <REDACTED>@fss.scot; <REDACTED>@fss.scot; <REDACTED>@gov.scot;
<REDACTED> <<REDACTED>@vmd.gov.uk>; <REDACTED>
<<REDACTED>@vmd.gov.uk>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Thank you for response clarifying FSS position.

The name of the business of the site in question is The Scottish Salmon Company (FB0169) and the site is located in Loch Roag on the Isle of Lewis. Do you need a grid reference number or coordinates?

<http://aquaculture.scotland.gov.uk/> Scotland's aquaculture is useful for looking up locations for sites. So that may be useful for you as well.

I will be on leave tomorrow but my colleague <REDACTED> (CCed) is aware of the case and will be able to assist in my absence otherwise I will be back to work on Monday.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

Emails <REDACTED> - Out of Scope

From: <REDACTED> <<REDACTED>@vmd.gov.uk>

Sent: 28 April 2020 07:08

To: <REDACTED> <REDACTED>@gov.scot>

Cc: <REDACTED> <REDACTED>@fss.scot>; <REDACTED>

<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

<REDACTED>

I have been copied in on the correspondence ref this case, in my enforcement role, and am now thinking a warning letter probably needs to go to the vet. However, before I do anything I would be grateful for a quick chat, just to clarify a couple of points. It appears to me that we either have :

- Off SPC use in accordance with the cascade. So, 6 treatments in a 12 month period, which is twice that on the SPC
- Off SPC use not in accordance with the cascade, and thus a breach of the Vet Med Regs.

Could you please let me know when would be a convenient time to give you a call.

Thanks, and best wishes to you

<REDACTED>

<REDACTED> | Veterinary Medicines Directorate

Direct line: <REDACTED> | Email: <REDACTED>@vmd.gov.uk |

Address: Woodham Lane, New Haw, Addlestone, Surrey KT15 3LS

From: <REDACTED>@gov.scot <REDACTED>@gov.scot>

Sent: 24 April 2020 07:45

To: <REDACTED>@fss.scot; <REDACTED>@gov.scot; Incidents@fss.scot

Cc: <REDACTED>@fss.scot; <REDACTED> <REDACTED>@vmd.gov.uk>;

<REDACTED> <REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Good morning

In <REDACTED> absence the grid reference for the site is NB137355. Here's the link to the site on Scotland's Aquaculture website:

http://aquaculture.scotland.gov.uk/data/site_details_record.aspx?site_id=FS0927

If you need any further information please let me know.

Regards

<REDACTED>

Fish Health Inspectorate Technical Manager

Marine Scotland - Science

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

Tel: <REDACTED>

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

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED>@fss.scot>

Sent: 23 April 2020 16:15

To: <REDACTED> <REDACTED>@gov.scot>; FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> <REDACTED>@fss.scot>; <REDACTED> (MARLAB)

<REDACTED>@gov.scot>; <REDACTED>@vmd.gov.uk>; <REDACTED>

<REDACTED>@vmd.gov.uk) <REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED> et al

The Scottish Salmon Co have several sites in Loch Roag, so really need a site name/grid ref.

Regards, <REDACTED>

Note - following coronavirus measures, my office number should transfer to my mobile number and work email below is still valid -

<REDACTED>

<REDACTED>

Food Standards Scotland

Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

<REDACTED>

<REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED> <REDACTED>@gov.scot>

Sent: 23 April 2020 15:24

To: FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> <REDACTED>@fss.scot>; <REDACTED>

<REDACTED>@fss.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>;

<REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>

<REDACTED>@vmd.gov.uk) <REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Thank you for response clarifying FSS position.

The name of the business of the site in question is The Scottish Salmon Company (FB0169) and the site is located in Loch Roag on the Isle of Lewis. Do you need a grid reference number or coordinates?

<http://aquaculture.scotland.gov.uk/> Scotland's aquaculture is useful for looking up locations for sites. So that may be useful for you as well.

I will be on leave tomorrow but my colleague <REDACTED> (CCed) is aware of the case and will be able to assist in my absence otherwise I will be back to work on Monday.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

Email <REDACTED> – Out of scope

From: <REDACTED> <REDACTED>@gov.scot>
Sent: 30 April 2020 15:19
To: FSS Incidents Mailbox <Incidents@fss.scot>
Cc: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>;
<REDACTED> <REDACTED>@fss.scot>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins RCA form

Hi <REDACTED>,

I sent out the report earlier and copied you in. As far as completing the form I think it may be better for you to contact the business directly. If you require any contact details please let me know.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox
Sent: 30 April 2020 11:30
To: <REDACTED> <REDACTED>@gov.scot>
Cc: FSS Incidents Mailbox <Incidents@fss.scot>; <REDACTED>
<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>;
<REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@fss.scot>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins RCA form

Thanks <REDACTED>,

Quick question – For all incidents that we deal with we record what the root cause of the incident is to help ourselves and businesses to identify preventative measures,

potential for lessons learned and for our information - will the root cause of this incident be in your report?

I have attached our root cause analysis form which you may want to ask the business to complete it if you feel it is appropriate.

Appreciate that in the end this was not a food safety issue.

Cheers,

<REDACTED>

From: <REDACTED> <REDACTED>@gov.scot>

Sent: 30 April 2020 11:09

To: FSS Incidents Mailbox <Incidents@fss.scot>; <REDACTED>
<REDACTED>@fss.scot>; <REDACTED> <REDACTED>@vmd.gov.uk>

Cc: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>; FSS Scientific Risk Assessment
<RiskAssessment@fss.scot>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Apologies for the late reply. I thought I had already replied. From my point of view the FHI's part of the investigation is concluded with the VMD Enforcement team taking over the investigation from us. I am just finalising my report to VMD and I will copy you into it when it goes out

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox

Sent: 28 April 2020 12:40

To: <REDACTED> <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@fss.scot>; <REDACTED> <REDACTED>@vmd.gov.uk>

Cc: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>

<REDACTED>@vmd.gov.uk>; FSS Scientific Risk Assessment
<RiskAssessment@fss.scot>; FSS Incidents Mailbox <Incidents@fss.scot>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

From an incidents point of view we are now happy that there is no food incident following Will's assessment and I have a few things on my plate so will not have time to TC today.

We would however be grateful if you could copy us into further correspondence for our information so that we can see/understand what the conclusion of this issue will be.

Thanks again!

<REDACTED>

From: <REDACTED> <REDACTED>@gov.scot>
Sent: 28 April 2020 10:50
To: <REDACTED> <REDACTED>@fss.scot>; <REDACTED>
<REDACTED>@vmd.gov.uk>
Cc: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>; FSS Incidents Mailbox <Incidents@fss.scot>; FSS Scientific Risk Assessment <RiskAssessment@fss.scot>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Thank you for the offer. I think if you are content that this doesn't constitute a food incident then it will fall to VMD as <REDACTED> has outlined. However, I am happy for you or anyone from the Incident team to join via TC if you feel this would be valuable. I am also happy to speak to anyone individually if there are any further questions or discussions to be had. I am available on my mobile or via Skype.

Kind Regards,
<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <REDACTED>@fss.scot>
Sent: 28 April 2020 10:22
To: <REDACTED> <REDACTED>@gov.scot>; <REDACTED>
<REDACTED>@vmd.gov.uk>
Cc: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<REDACTED>@vmd.gov.uk>; FSS Incidents Mailbox <Incidents@fss.scot>; FSS
Scientific Risk Assessment <RiskAssessment@fss.scot>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for
information

Hi <REDACTED>

Happy to participate by TC/Skype if needed. From the information I have any food safety risk would be negligible and I'm copying in our incidents team so that they are aware and in case they want to participate too.

Regards, <REDACTED>

Note - following coronavirus measures, my office number should transfer to my mobile number and work email below is still valid -

<REDACTED>
<REDACTED>
Food Standards Scotland
Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL
<REDACTED>
<REDACTED>
<REDACTED>@fss.scot
www.foodstandards.gov.scot

Email <REDACTED> - Out of scope

From: <REDACTED> <REDACTED>@vmd.gov.uk>
Sent: 28 April 2020 07:08
To: <REDACTED> <REDACTED>@gov.scot>
Cc: <REDACTED> <REDACTED>@fss.scot>; <REDACTED>
<REDACTED>@vmd.gov.uk>; <REDACTED> <REDACTED>@vmd.gov.uk>
Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for
information

Hi <REDACTED>

<REDACTED>

I have been copied in on the correspondence ref this case, in my enforcement role, and am now thinking a warning letter probably needs to go to the vet. However, before I do anything I would be grateful for a quick chat, just to clarify a couple of points. It appears to me that we either have :

- Off SPC use in accordance with the cascade. So, 6 treatments in a 12 month period, which is twice that on the SPC
- Off SPC use not in accordance with the cascade, and thus a breach of the Vet Med Regs.

Could you please let me know when would be a convenient time to give you a call.

Thanks, and best wishes to you

<REDACTED>

<REDACTED> | <REDACTED> | **Veterinary Medicines Directorate**

Direct line: <REDACTED> | Email: <REDACTED>@vmd.gov.uk |

Address: Woodham Lane, New Haw, Addlestone, Surrey KT15 3LS

From: <REDACTED>@gov.scot

Sent: 24 April 2020 07:45

To: <REDACTED>@fss.scot; <REDACTED>@gov.scot; Incidents@fss.scot

Cc: <REDACTED>@fss.scot; <REDACTED> <REDACTED>@vmd.gov.uk>;

<REDACTED> <REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Good morning

In <REDACTED> absence the grid reference for the site is NB137355. Here's the link to the site on Scotland's Aquaculture website:

http://aquaculture.scotland.gov.uk/data/site_details_record.aspx?site_id=FS0927

If you need any further information please let me know.

Regards

<REDACTED>

Fish Health Inspectorate Technical Manager

Marine Scotland - Science

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

Tel: <REDACTED>

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

e: <REDACTED>@gov.scot

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

From: <REDACTED> <REDACTED>@fss.scot>

Sent: 23 April 2020 16:15

To: <REDACTED> <REDACTED>@gov.scot>; FSS Incidents Mailbox

<Incidents@fss.scot>

Cc: <REDACTED> <REDACTED>@fss.scot>; <REDACTED> (MARLAB)
<REDACTED>@gov.scot>; <REDACTED> <REDACTED>@vmd.gov.uk>;
<REDACTED> <REDACTED>@vmd.gov.uk) <<REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED> et al

The Scottish Salmon Co have several sites in Loch Roag, so really need a site name/grid ref.

Regards, <REDACTED>

Note - following coronavirus measures, my office number should transfer to my mobile number and work email below is still valid -

<REDACTED>

<REDACTED>

Food Standards Scotland

Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

<REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED><<REDACTED>@gov.scot>

Sent: 23 April 2020 15:24

To: FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> <<REDACTED>@fss.scot>;

<REDACTED><<REDACTED>@fss.scot>; <REDACTED>(MARLAB)

<<REDACTED>@gov.scot>; <REDACTED><<REDACTED>@vmd.gov.uk>;

<REDACTED>@vmd.gov.uk) <<REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Thank you for response clarifying FSS position.

The name of the business of the site in question is The Scottish Salmon Company (FB0169) and the site is located in Loch Roag on the Isle of Lewis. Do you need a grid reference number or coordinates?

<http://aquaculture.scotland.gov.uk/> Scotland's aquaculture is useful for looking up locations for sites. So that may be useful for you as well.

I will be on leave tomorrow but my colleague <REDACTED> (CCed) is aware of the case and will be able to assist in my absence otherwise I will be back to work on Monday.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED><<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox

Sent: 23 April 2020 15:12

To: <REDACTED> <REDACTED>@gov.scot>

Cc: <REDACTED>@fss.scot>; <REDACTED> <REDACTED>@fss.scot>;

<REDACTED>(MARLAB) <REDACTED>@gov.scot>; <REDACTED>

<<REDACTED>@vmd.gov.uk>; <REDACTED>(<REDACTED>@vmd.gov.uk)

<<REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Thanks for this.

I have just had a meeting with colleagues and as far as we can tell this would be one for VMD or APHA to take forward as there is no risk to health identified. We will however review the information which you sent to us and get back to you if we need anything further.

I just have one more query – For info can you confirm the name of the business who own the fish farm and the exact location – I think it may be in the wester Isles? Apologies if I have missed this from previous information.

Kind Regards,

<REDACTED>

From: <REDACTED> <<REDACTED>@gov.scot>

Sent: 23 April 2020 13:37

To: FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> <<REDACTED>@fss.scot>;

<REDACTED><<REDACTED>@fss.scot>; <REDACTED> (MARLAB)

<<REDACTED>@gov.scot>; <REDACTED> <<REDACTED>@vmd.gov.uk>;

<REDACTED> (<REDACTED>@vmd.gov.uk) <<REDACTED>@vmd.gov.uk>

Subject: RE: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

Please find attached a compressed zip file containing the treatment, harvest and movement record in question.

As for your questions:

- How long 500 degree days really are?
Degree days are used with regards to fish because they are poikilotherm, which means their metabolic rate depends on the water temperature. So the water temperature (degrees centigrade) is multiplied by the number of days to get degree days. Obviously the water temperature changes so it is difficult to say for certain how long the withdrawal would have been. I could request temperature logs from the company as they record the temperature every day. However, when the case inspector was on site he measured the temperature as 5.5C, which means 500 degree days at 5.5C would have been 91 days. But considering that water temperatures would start to warm approaching spring it would have likely been less.
- Who would take any enforcement action with the business with regards to not following withdrawal periods? <REDACTED> would this be one for VMDs enforcement branch? I could also ask the question to APHA colleagues.
This is one for VMD to advise on. As we understand it, the business has followed the prescribed withdrawal period.
- What systems a primary producer in this sector has in place for withdrawing/recalling product from their customers/the market (if any) when they have identified issues with the product which has been sent on to the market.
This is unfortunately not something I can advise on. We deal with fish health and have no interaction with the process once fish are harvested. However, from information available online it would suggest that systems are in place to enable product recall. See link below to article from 2014.

<https://www.fishfarmermagazine.com/archive-2/morrisons-recalls-fresh-scottish-salmon-fishupdate-com/>

Happy to discuss on the phone if you require any further background information or anything isn't clear. Apologies I had forgotten to switch on my mobile this morning. It is now switched on if you would still like to speak to me.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox
Sent: 23 April 2020 13:23
To: <REDACTED> <<REDACTED>@gov.scot>
Cc: FSS Incidents Mailbox <Incidents@fss.scot>; <REDACTED><<REDACTED>@fss.scot>; <REDACTED><<REDACTED>@fss.scot>
Subject: 028-2020 Confirmed positive in Salmon for Avermectins Request for information

Hi <REDACTED>,

I just tried to call you.

Just wanted to inform you that after discussions with my manager we have now decided to now make this issue a food incident. Grateful if you can send on the requested information as soon as you can so as to facilitate a risk assessment.

Cheers,

<REDACTED>

From: <REDACTED> <<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox
Sent: 23 April 2020 08:49
To: <REDACTED> <<REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@fss.scot>; FSS Incidents Mailbox <Incidents@fss.scot>; <REDACTED>
<<REDACTED>@fss.scot>
Subject: Confirmed positive in Salmon for Avermectins 2001976

Hi <REDACTED>,

Thanks for getting back to me.

This new information does raise a few questions - I will discuss with our Science risk assessment colleagues and get back to you. It's reassuring that the fish harvested would likely have been below the MRL at the time for harvest and I suppose it would be difficult to prove that they were not.

It would also be good to understand;

- How long 500 degree days really are?
- Who would take any enforcement action with the business with regards to not following withdrawal periods? <REDACTED> would this be one for VMDs enforcement branch? I could also ask the question to APHA colleagues.

- What systems a primary producer in this sector has in place for withdrawing/recalling product from their customers/the market (if any) when they have identified issues with the product which has been sent on to the market.

Grateful if you could send through all records of treatment/feeding, as well as the details for the harvests that took place - It would be good for us to view for our information at the very least.

Happy to discuss further over the phone – as I stated before we have not dealt with a positive RIM issue in Salmon before to my knowledge so any advice/comments on my query's above would be welcome.

Kind Regards,

<REDACTED>

<REDACTED>

Incidents Officer

Scottish Food Crime and Incidents Unit

Food Standards Scotland

3rd Floor Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

Office <REDACTED>

Mobile <REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED> <<REDACTED>@gov.scot>

Sent: 22 April 2020 12:21

To: FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>;

<REDACTED><<REDACTED>@fss.scot>;

<REDACTED><<REDACTED>@vmd.gov.uk>

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976

Hi <REDACTED>,

Thank you for getting back to me.

I have now received the complete records from the company as requested. This includes a comprehensive record of the treatment/feeding, as well as the details for the harvests that took place on the 5th and 29th March, the stock details prior to the harvest and the dates of the slice treatments applied to the stock on site since input. If you need copies of any of these to pass on to your colleagues for risk analysis please let me know.

I have discussed the situation in detail with my colleague who was in charge of sample collection before me. From previous knowledge of how emamectin benzoate lasts in the flesh and taking into consideration that the second Avermectin sample was compliant it would suggest that the extra time that passed between the sample collection and the harvest taking place that fish would have likely been below the MRL at the time of harvest. However, I feel it is important to reiterate that the batches that were harvested were not the ones sampled.

Having reviewed the records provided by the company there are no issues with record keeping. However, as we see it the potential issue lies in the number of treatments given to the stock in the timeframe (6 treatments of SLICE in 12 months at sea). The summary of product characteristics (SPC) for SLICE states in point 4.9 that:

“The recommended maximum number of marine treatments is 5 per 2 year growth cycle and not more than 3 per 12 month period.”

We have sought clarification from VMD (<REDACTED> CCed) and the policy position appears to be that the statutory withdrawal period of 500 degree days should have been applied in this case due to the treatment not having been applied in accordance with the approved Marketing Authorisation. Which means that the harvest would have taken place when the fish should have been under statutory withdrawal.

Grateful if you could advise what implications this will have from FSS view.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED>) <<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox

Sent: 21 April 2020 15:50

To: <REDACTED>) <<REDACTED>@gov.scot>

Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>;

<REDACTED><<REDACTED>@fss.scot>; FSS Incidents Mailbox <Incidents@fss.scot>

Subject: Confirmed positive in Salmon for Avermectins 2001976

Hi <REDACTED>,

Sorry for the delay in getting back to you I have been on leave and also wanted to look at what VMDs assessment was of the issue.

From the information we have received so far there looks to be no risk to health for consumers from this issue plus there has been no distribution from the affected cage anyway so this is not a food incident.

<REDACTED> commented below that the main issue may potentially be poor record keeping on vet meds by the business but I'm not sure who would be the competent authority who would enforce this but it would not be FSS - possibly APHA?

As <REDACTED> said If, or when, you have the further information you have requested we should have a clearer picture of how this is best taken forward, and by which body. We have contacts at APHA so I will be happy to pass the issue on to them to see if they would investigate the vet meds issue if there is one.

Kind Regards,

<REDACTED>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>

Sent: 20 April 2020 14:09

To: <REDACTED> <<REDACTED>@vmd.gov.uk>; <REDACTED>

<<REDACTED>@gov.scot>; FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (FSS)

<<REDACTED>@fss.scot>; <REDACTED>) <<REDACTED>@fss.scot>;

<REDACTED><<REDACTED>@vmd.gov.uk>;

<REDACTED><<REDACTED>@vmd.gov.uk>;

<REDACTED><<REDACTED>@vmd.gov.uk>

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED> and all

If I recall correctly, the non-compliance is a relatively small breach at 140µg/kg (MRL 100).

It is not, as pointed out earlier in the exchanges, a health risk, but regardless of that, the main issue is whether proper records have been kept.

Records of treatments with veterinary medicines based on vet advice, and movement records.

If there is concern that a lax approach has been taken on vet med records then this should be investigated further; either by FSS or passed to VMD's Enforcement branch to investigate further.

If, or when, you have the further information you have requested, <REDACTED>, it would be helpful if you set out which regulations you feel may have been breached under the Animal and Animal Products (Examination for Residues and Maximum Residue Limits) (England and Scotland) Regulations 2015 and/or the Veterinary Medicines Regulations 2013.

That should give a clearer picture of how this is best taken forward, and by which body.

<REDACTED> – just to let you know that I retired last Friday, and am just tying up some loose ends today.

Best wishes to all, and stay safe.

<REDACTED>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 16 April 2020 11:18
To: <REDACTED>@gov.scot; Incidents@fss.scot
Cc: <REDACTED>@gov.scot; <REDACTED>@fss.scot; <REDACTED>@fss.scot;
<REDACTED><<REDACTED>@vmd.gov.uk>;
<REDACTED><<REDACTED>@vmd.gov.uk>;
<REDACTED><<REDACTED>@vmd.gov.uk>
Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>

Thank you for your email, sorry have not come back to you. I have passed your emails to <REDACTED> to consider and advise how he wishes to proceed. Speaking to <REDACTED> earlier this week, he said he would have another read of your findings and send email on how to proceed.

I have copied <REDACTED> into this email.

KRs

<REDACTED>

From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 16 April 2020 11:11
To: Incidents@fss.scot; <REDACTED> <<REDACTED>@vmd.gov.uk>
Cc: <REDACTED>@gov.scot; <REDACTED>@fss.scot; <REDACTED>@fss.scot
Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Good morning,

Since I have not had a response from FSS or VMD I just wanted to check if you are content with the information supplied? Is there any further information you require? What further actions would you like me to take if any?

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED>
Sent: 08 April 2020 15:01
To: FSS Incidents Mailbox <Incidents@fss.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk) <<REDACTED>@vmd.gov.uk>
Cc: <REDACTED>(MARLAB) <<REDACTED>@gov.scot>; <REDACTED>) (FSS)
<<REDACTED>@fss.scot>; <REDACTED>) <<REDACTED>@fss.scot>
Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Dear all,

I have had further information from the business, which however was still missing some pertinent information. This has been requested and I am expecting a quicker turn around than last time.

However, the business has confirmed that salmon from the affected cage were not included in the harvests on 5 and 29 March. The movement record indicated that 15,900 fish were removed for harvest on the 5 March 2020 and 7,057 fish on the 29 March 2020. Fish that were removed for harvest came from cage 1 and 2. The samples that we collected for analysis for Avermectins came from pen 11 and 13. The sample from cage 13 was compliant for Avermectins, while the sample from cage 11 was non-compliant.

From the records provided, we know that all pens on the site were treated with SLICE (medicated in-feed treatment) from the 4-18 February 2020. The business contact indicated to me on the phone when I initially spoke with her that the feed was fed in an abnormal pattern (possibly alternating days) due to fish being on starve for other sea lice treatments. The provided treatment records are not clear on this and I have requested further details on this.

I have also received a copy of the prescription which asks to test tissue levels of emamectin benzoate (active substance in SLICE) for treatments over 14 days. This I have been told is intended to check, in instances of poor feeding/health, whether the fish have reached the minimum effective tissue residue rather than check the MRL has not been exceeded and doesn't appear to have been conducted in this case.

The prescription gives a zero day withdrawal for the treatment, which clearly indicates it was not a sampling error. In the past we were instructed by VMD that it is the vet's responsibility to set a suitable withdrawal period and that if any residue violations resulted from this that it would be the vet's responsibility.

Kind regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox

Sent: 03 April 2020 15:27

To: <REDACTED>) <<REDACTED>@gov.scot>

Cc: <REDACTED>) (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>
(MARLAB) <<REDACTED>@gov.scot>; <REDACTED> <REDACTED>(FSS)
<<REDACTED> @fss.scot>; <REDACTED><<REDACTED>@fss.scot>

Subject: FW: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>,

Just to let you know that I will be on holiday next week so my colleague
<REDACTED> will be the point of contact for FSS regarding this issue.

You can call her on <REDACTED> or <REDACTED>. I have also copied her into
this email.

Kind Regards,

<REDACTED>

<REDACTED> Incidents Officer

Scottish Food Crime and Incidents Unit

Food Standards Scotland

3rd Floor Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

Office <REDACTED>

Mobile <REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED>) <<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox

Sent: 02 April 2020 18:54

To: <REDACTED><<REDACTED>@gov.scot>

Cc: <REDACTED>) (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>
(MARLAB) <<REDACTED>@gov.scot>; FSS Incidents Mailbox <Incidents@fss.scot>;
<REDACTED> <<REDACTED>@fss.scot>; FSS Scientific Risk Assessment

<RiskAssessment@fss.scot>

Subject: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Hi <REDACTED>,

Thanks again for the telephone updates you have provided to me so far.

Just to confirm;

- You advised that the higher levels found in the fish may be due to a change to the salmon's usual medicated treatment.
- You understand that there has been 2 harvests of salmon since the positive sample came back but it has not been confirmed if the harvest came from the same batch of salmon.
- You informed me that investigations are on-going and you will keep FSS updated.

FYI I have discussed this issue with <REDACTED> from our scientific risk assessment team. <REDACTED> has informed me that from the information provided so far the risk to health is low in his opinion.

Once we receive more information we will review and may request a risk assessment from colleagues at the Food Standards Agency.

Grateful if you could keep us updated on investigations and if possible confirm;

- If Salmon from the affected batch has entered the food chain which business(es) bought the salmon
- What quantities were dispatched and when.
- If there may have been a possible issue with the feed - should it be tested?
- When you think investigations on what happened will be completed

As discussed this is an unusual notification for FSS so apologies if any of my requests are not business as usual for MS. However until we have further information we will not be classifying this as a food incident.

Kind Regards,

<REDACTED>

<REDACTED>

Incidents Officer

Scottish Food Crime and Incidents Unit

Food Standards Scotland

3rd Floor Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

Office <REDACTED>

Mobile <REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED><<REDACTED>@fss.scot> **On Behalf Of** FSS Incidents Mailbox
Sent: 01 April 2020 15:34
To: <REDACTED>) <<REDACTED>@gov.scot>
Cc: <REDACTED>) (MARLAB) <<REDACTED>@gov.scot>;
<REDACTED>(MARLAB) <REDACTED>@gov.scot>;
<REDACTED><<REDACTED>@fss.scot>; FSS Scientific Risk Assessment
<RiskAssessment@fss.scot>; FSS Incidents Mailbox <Incidents@fss.scot>
Subject: RE: confirmed positive 2001976

Good afternoon <REDACTED>,

The FSS incidents team have been made aware by FSA colleagues of the attached sample 2001976 containing a confirmed emamectin residue in salmon reported today. As it is unusual for FSS to receive such notifications regarding residues in fish (it's usually cattle or sheep). We would be grateful if you could inform us;

- If you believe there may be a risk to the food chain given this result. (appreciate the sample was taken in February)
- What is Marine Scotland's next steps as far as investigations goes and how long do you think investigations may take.
- Are these types of positive samples common?

FYI I will be sending the attached document to our science colleagues to get their assessment on whether there is/was a risk to consumers as per our usual procedures with positive residue samples.

Happy to discuss over the phone.

Take care and stay safe.

Cheers,

<REDACTED>

<REDACTED>

Incidents Officer

Scottish Food Crime and Incidents Unit

Food Standards Scotland

3rd Floor Pilgrim House, Old Ford Road, Aberdeen, AB11 5RL

Office <REDACTED>

Mobile <REDACTED>

<REDACTED>@fss.scot

www.foodstandards.gov.scot

From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 01 April 2020 12:48
To: <REDACTED>@vmd.gov.uk
Cc: FoodIncidents <FoodIncidents@food.gov.uk>; <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED>(MARLAB) <<REDACTED>@gov.scot>
Subject: RE: confirmed positive 2001976

Please note, this e-mail originated from outside the FSA. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi <REDACTED>,

I hope you are well. I will look into it and get back to you.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 01 April 2020 12:41
To: <REDACTED><<REDACTED>@gov.scot>
Cc: FoodIncidents <FoodIncidents@food.gov.uk>; <REDACTED>(MARLAB) <<REDACTED>@gov.scot>
Subject: FW: confirmed positive 2001976

Hello <REDACTED>

Please find attached documents for non-compliant 2001976. Could you investigate for us when convenient?

Thanks
<REDACTED>

From: <REDACTED><<REDACTED>@fera.co.uk>
Sent: 01 April 2020 11:46
To: <REDACTED> <<REDACTED>@vmd.gov.uk>
Cc: Residues_Statutory_Programme_Positives <Residues_Statutory_Programme_Positives@fera.co.uk>
Subject: confirmed positive 2001976

Hi <REDACTED>

A copy of Forms A & B and a Certificate of Analysis for sample 2001976 containing a confirmed emamectin residue reported today, is attached.

Kind Regards

<REDACTED>



<REDACTED>Fera Science Ltd.

<REDACTED>@fera.co.uk | Tel <REDACTED>

From: <REDACTED> <<REDACTED>@gov.scot>

Sent: 06 April 2020 07:56

To: FSS Incidents Mailbox <Incidents@fss.scot>

Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>; <REDACTED> (MARLAB) <REDACTED>@gov.scot>; <REDACTED> (FSS) <REDACTED>@fss.scot>; <REDACTED> <REDACTED>@fss.scot>

Subject: RE: Confirmed positive in Salmon for Avermectins 2001976 - update and request

Good morning,

Apologies for not getting back on Friday. I was hoping to get an update from the company with more information before getting back to you. I can confirm the details below are my current understanding of the situation. Despite attempts to contact the business I have had no further communication at this point. I will try and get a hold of them today and get back to you as soon as I have any new details. I will of course keep you abreast of the investigation.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 04 May 2020 07:28
To: <REDACTED> <<REDACTED>@gov.scot>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>;
<REDACTED><<REDACTED>@vmd.gov.uk>;
<REDACTED><<REDACTED>@vmd.gov.uk>;
<REDACTED><<REDACTED>@vmd.gov.uk>; FSS Incidents Mailbox
<Incidents@fss.scot>; <REDACTED><<REDACTED>@fss.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk>; <REDACTED><<REDACTED>@vmd.gov.uk>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Morning <REDACTED>

Thank you for your email of 30th April, which included the full investigation report into the positive result reported to you on 01 April 2020 from Kyles of Vuia.

KRs

<REDACTED>

<REDACTED>|*Operations |Residues Surveillance Unit*

Veterinary Medicines Directorate |Direct line: <REDACTED>

Email: <REDACTED>@vmd.gov.uk|Address: New Haw, Addlestone, Surrey KT15 3LS

From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 30 April 2020 12:33
To: <REDACTED><<REDACTED>@vmd.gov.uk>
Cc: <REDACTED>@gov.scot; <REDACTED><<REDACTED>@vmd.gov.uk>;
<REDACTED><<REDACTED>@vmd.gov.uk>; <REDACTED>
<<REDACTED>@vmd.gov.uk>; Incidents@fss.scot; <REDACTED>@fss.scot;
<REDACTED> <<REDACTED>@vmd.gov.uk>; <REDACTED>
<<REDACTED>@vmd.gov.uk>
Subject: Investigation report for positive result at Kyles of Vuia April 2020

Hi <REDACTED>,

Please find attached a cover letter and the full investigation report into the positive result reported to us on 01 April 2020 at Kyles of Vuia.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

Morning <REDACTED>,

<REDACTED>

Just to let you know <REDACTED> came back to me this morning to acknowledge the content of the email I sent. The case is therefore closed for the VMD.

Thanks for you help with this one, keep safe.

Kind regards,
<REDACTED>

<REDACTED> | **Enforcement | Operations I Veterinary Medicines Directorate**
Direct line: <REDACTED> | **Mobile:** <REDACTED> | **Email:**
<REDACTED>@vmd.gov.uk | **Address:** Woodham Lane, New Haw, Addlestone,
Surrey KT15 3LS



From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 14 May 2020 09:31
To: <REDACTED> <<REDACTED>@vmd.gov.uk>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Good morning <REDACTED>,

<REDACTED>

That's good to know. Thank you. I am not expecting anything back from the company with regards to this but if I hear any further I will be in touch as well.

Kind Regards,
<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 13 May 2020 10:45
To: <REDACTED> <<REDACTED>@gov.scot>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

HI <REDACTED>,

<REDACTED>

No problem at all, the email was sent to <REDACTED> this morning, removing the lines you suggested. I will let you know if anything further crops up.

Kind regards,
<REDACTED>

<REDACTED> | Enforcement | Operations I Veterinary Medicines Directorate
Direct line: <REDACTED> | **Mobile:** <REDACTED> | **Email:**
<REDACTED>@vmd.gov.uk | **Address:** Woodham Lane, New Haw, Addlestone,
Surrey KT15 3LS



From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 13 May 2020 08:29
To: <REDACTED> <<REDACTED>@vmd.gov.uk>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Good morning,

<REDACTED>

That's great. Glad to help. If there is anything else please feel free to get in touch any time. Thanks very much for keeping me in the loop with the action you are taking in this case.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 12 May 2020 15:11
To: <REDACTED> <<REDACTED>@gov.scot>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Hi <REDACTED>,

<REDACTED>

Thank you for this, its much appreciated.
The email had not gone out yet, which is good.
I will liaise with the residues team as they drafted this part of the email, and go from there.

Kind regards,
<REDACTED>

<REDACTED> | Enforcement | Operations I Veterinary Medicines Directorate
Direct line: <REDACTED> | **Mobile:** <REDACTED> | **Email:**
<REDACTED>@vmd.gov.uk | **Address:** Woodham Lane, New Haw, Addlestone,
Surrey KT15 3LS



From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 12 May 2020 09:09
To: <REDACTED> <<REDACTED>@vmd.gov.uk>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Hi <REDACTED>,

Thank you for your swift reply and for letting me see the text for the email destined to go out to the vet.

I'm not sure if this will have gone out already but I just thought I'd mention it just in case it hasn't. I think the wording is maybe slightly inaccurate in the sentence highlighted below. First we only have the treatment record of the most recent treatment so don't know how the previous 5 treatments were administered and from my recollection of the records it wasn't as straight forward as alternating days. I believe some pens received treatments for up to 10 (non-consecutive) days while other received treatment over 7 (non-consecutive) days. It might be best to remove the reference to the number of days of treatments (two highlighted sections) completely.

Hope you are well. Stay safe.

Kind Regards,
<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

Tel: +<REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 12 May 2020 08:29
To: <REDACTED> <<REDACTED>@gov.scot>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Morning <REDACTED>,

Thank you for confirming so quickly, I really appreciate it.
Our intention is to send the following text via email to <REDACTED>, as the prescribing vet, this morning.

The Veterinary Medicines Directorate (VMD) is the body responsible for ensuring all veterinary medicines in the United Kingdom are marketed in accordance with the Veterinary Medicines Regulations 2013 (VMR). The VMD's aim is to protect public health, animal health and the environment and to promote animal welfare by assuring safety, quality and efficacy of veterinary medicines. One of the purposes of the VMR is to prevent veterinary medicines being purchased or administered in a way that could potentially damage the health of both humans and animals.

The VMD have been made aware that a sample of Salmon from The Scottish Salmon Company site Kyles of Vuia was tested for residues and returned a positive result for traces of Emamectin exceeding the Maximum Residue Limit (MRL) .

Whilst this incident does not strictly constitute a residues violation, as the non-compliant sample originated from a fish which was not harvested, care should be taken when using a non-standard treatment regimen which deviates from that as outlined in the Summary of Product Characteristics (SPC); Emamectin is a particularly bioaccumulative compound which accumulates in the flesh of salmon, and this will have contributed to the sample testing above the MRL.

*The medicine records for these fish demonstrate that the stock on site received six treatments of Slice 2 mg/g Premix for Medicated Feeding Stuff in a 12 month period, **administered over 14 alternate days**, as opposed to the regimen outlined in the SPC of a maximum of three treatments a year, **administered over 7 consecutive days**.*

There are implications of prescribing and using the product in this fashion; treatment in this way is defined as cascade use, so a 500 degree day withdrawal period is applicable to all fish treated. Please see the [cascade prescribing guidance](#) for further information.

Regulation 8 (para 6) of the VMR states : No person may administer a veterinary medicinal product to an animal unless (a) the product has a marketing authorisation authorising its administration in the United Kingdom, and the administration is in accordance with the marketing authorisation.

In this case the evidence suggests that Section 4.9 of the SPC may not have been followed. The product has therefore not been administered in accordance with the Marketing Authorisation. This is a breach of the VMR.

We have decided on the basis of the information held at present not to take further action on this occasion.

By way of a reply to this email, please acknowledged that you have read and understood its contents.

I think we have all we need for now, but please let me know if you need anything from our side.

Stay safe.

Kind regards,
<REDACTED>

<REDACTED> | Enforcement | Operations | Veterinary Medicines Directorate
Direct line: <REDACTED> | Mobile: <REDACTED> | Email:
<REDACTED>@vmd.gov.uk | Address: Woodham Lane, New Haw, Addlestone,
Surrey KT15 3LS



From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 12 May 2020 07:56
To: <REDACTED> <<REDACTED>@vmd.gov.uk>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Hi <REDACTED>,

I can confirm that the site is authorised with Marine Scotland Science FHI under the site name Kyles of Vuia and the site number is FS0927.

Please let me know if there is anything else you need. I'd be keen to be kept apprised with regards to the enforcement letter.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500

Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 11 May 2020 15:29
To: <REDACTED> <<REDACTED>@gov.scot>
Subject: RE: Investigation report for positive result at Kyles of Vuia April 2020

Hi <REDACTED>,

I hope all is well with you with all that is going on.

I am in the process of drafting an enforcement letter, well email in this case, to the individual concerned with this case.

Please can I just double check the site name in question is Kyles of Vuia as stated in your inspection report?

Thank you in advance.

Kind regards,
<REDACTED>

<REDACTED> | **Enforcement | Operations I Veterinary Medicines Directorate**
Direct line: <REDACTED> | **Mobile:** <REDACTED> | **Email:**
<REDACTED>@vmd.gov.uk | **Address:** Woodham Lane, New Haw, Addlestone,
Surrey KT15 3LS



Hi <REDACTED>,

Thank you for the quick reply and suggested wording. I will amend and send out the letter to the company today.

Kind Regards,

<REDACTED>

<REDACTED>
Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>
S/B: +44 (0)131 244 2500
Mobile: <REDACTED>
e: <REDACTED>@gov.scot
w: <http://www.gov.scot/Topics/marine>

Document 45

From: <REDACTED> <<REDACTED>@vmd.gov.uk>
Sent: 05 May 2020 15:08
To: <REDACTED> <<REDACTED>@gov.scot>; <REDACTED>
<<REDACTED>@vmd.gov.uk>
Cc: <REDACTED> (MARLAB) <<REDACTED>@gov.scot>
Subject: RE: Wording for letter to TSSC

Hi <REDACTED>

Thanks for this – I've just made a few small tweaks, and cut and pasted the exact wording from the SPC.

Best wishes,
<REDACTED>

Inspection of the treatment records showed that the maximum recommended number of marine treatments as outlined in the Summary of Product Characteristics (SPC) of 5 per 2 year growth cycle, and not more than 3 per 12 month period, had been exceeded and was possibly a contributing factor for the non-compliant sample. The policy position, as set out by the Veterinary Medicines Directorate (VMD), is that all use outside of the approved Marketing Authorisation and SPC constitutes cascade use, and a statutory minimum withdrawal period of 500 degree days applies.

<REDACTED> | Residues Surveillance Unit | Operations
Veterinary Medicines Directorate | New Haw, Surrey, KT15 3LS
T: <REDACTED> | E: <REDACTED>@vmd.gov.uk

From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>
Sent: 05 May 2020 14:36
To: <REDACTED> <REDACTED>@vmd.gov.uk>; <REDACTED>
<<REDACTED>@vmd.gov.uk>
Cc: <REDACTED>@gov.scot
Subject: Wording for letter to TSSC

Hi <REDACTED>,

I hope you are well.

I have been working to close off the investigation into the positive sample and I have drafted a letter to the business (TSSC). I have copied the paragraph with regards to the policy to treatments not in line with the SPC below. Could you please let me know if you are content with the wording? Grateful for any comments.

Inspection of the treatment records showed that the maximum recommended number of marine treatments of no more than 3 in a 12 month period according to the Summary of Product Characteristics (SPC) for Slice had been exceeded and was possibly a contributing

factor for the non-compliant sample. The policy position, as set out by the Veterinary Medicines Directorate (VMD), is that all use not in accordance with the approved Marketing Authorisation and details set out in the SPC should be applied under cascade with the statutory minimum withdrawal of 500 degree days set.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

Hi <REDACTED>,

I have received your letter.

Warm Regards

<REDACTED>

<REDACTED>

Unit 1, Smithy Lane

Lochgilphead PA31 8TA

Tel: +44 (0)131 718 8500

DD: <REDACTED>

Mob: <REDACTED>

www.scottishsalmon.com

From: <REDACTED>@gov.scot <<REDACTED>@gov.scot>

Sent: 06 May 2020 10:29

To: <REDACTED> <<REDACTED>@scottishsalmon.com>

Subject: Kyles of Vuia non-compliant sample

Dear <REDACTED>,

Please find attached the formal letter concluding the FHI's investigation into the non-compliant sample at Kyles of Vuia. I am only issuing this letter electronically and would appreciate if you could please confirm receipt.

Kind Regards,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

From: <REDACTED>

Sent: 14 May 2020 11:14

To: <REDACTED> (MARLAB) <<REDACTED>@scotland.gsi.gov.uk>; <REDACTED> (MARLAB) <<REDACTED>@gov.scot>

Subject: Kyles of Vuia case closed

Hi,

Just to let you both know I have heard back from VMD Enforcement this morning. <REDACTED> has acknowledged the e-mail from VMD with regards to the use of the cascade for any treatments not in line with the MA and the SPC and the case is now closed from their point of view.

Thanks,

<REDACTED>

<REDACTED>

Senior Fish Health Inspector
Marine Scotland - Science

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

Tel: <REDACTED>

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

Mobile: <REDACTED>

e: <REDACTED>@gov.scot

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

SLICE Treatment Start Dates	
Site: KylesVuia	
	Start Date: 18/03/2019
	Start Date: 14/05/2019
	Start Date: 09/07/2019
	Start Date: 03/09/2019
	Start Date: 08/11/2019
	Start Date: 04/02/2020



Kyles of Vuia letter
(toTSSC) - Redacted



Cover Letter - VMD



VP 200113 009-20



VMD investigation



FoI 202000038615

investigation report - TSSC Kyles Vuia Slice report - Kyles of Vuia information to release



Kyles of Vuia
2001976-positive resu

From: <REDACTED> <<REDACTED>@Sepa.org.uk>
Sent: 22 February 2017 10:13
To: <REDACTED> <<REDACTED>@gov.scot>
Cc: <REDACTED> <<REDACTED>@sepa.org.uk>; <REDACTED>
<<REDACTED>@sepa.org.uk>

Subject: Summary brief - Regulation of the use of the sea louse treatment SLICE at Scottish fish farms

<REDACTED>

My apologies for delay in issue I had difficulties accessing systems yesterday – I am available on my mobile only today should you need to get hold of me.

<REDACTED> – out of scope

Thanks
<REDACTED>



Summary brief -
Regulation of the use

From: <REDACTED> <<REDACTED>@sepa.org.uk>
Sent: 24 February 2017 17:11
To: <REDACTED> (<REDACTED>) <<REDACTED>@gov.scot>; <REDACTED> <REDACTED>@gov.scot>
Cc: <REDACTED> <REDACTED>@gov.scot>; Communications Rural Economy & Environment
<CommunicationsRuralEconomy&Environment@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>;
<REDACTED> <<REDACTED>@sepa.org.uk>; Communications Duty Box
<CommunicationsDutyBox@gov.scot>
Subject: RE: Fish farm enquiries

Hi all, responses to questions from the Scotland on Sunday and Sunday Herald are below for info.

Regards,

<REDACTED>

Scotland on Sunday

<REDACTED> Out of scope

Can you explain the dangers to human health, farmed fish or the wider marine environment from excessive levels of some chemicals - eg ememectin, calicide, azamethisphos - in either the seabed or the fish?

“Aquaculture can have an adverse effect on the environment and, to control this, we promote compliance with legislation through the application of the Water Environment (Controlled Activities) (Scotland) Regulations 2011.

“While SEPA accepts that the environment in the immediate vicinity of a fish farm will be impacted by the emissions arising from the farm – including medicine residues, SEPA seeks to provide protection of the wider environment from discharges of pollutants such as chemicals or medicines used by fish farmers by placing limits on the scale or rate of releases of these substances.

“Those limits are set using the best available evidence, and based on the anticipated frequency and dose of treatment. This helps ensure the residues in the environment are within independently derived safe environmental standards and environmental impacts are within acceptable levels. Where medicines are used in accordance with the licences issued by SEPA we would not expect the residues present to pose a risk to the environment beyond the immediate vicinity of the cages and are unlikely to pose a risk to human health even if a person were willing to consume substantial quantities of mud from the seabed close to a fish farm.

“As well as measures taken by SEPA with the aim of ensuring environmental protection, the licensing of medicines by the Veterinary Medicines Directorate involves steps to ensure that animals, in this case fish, treated with medicines pose no risk to human health when they are eaten by consumers and that the use of the medicine itself does not harm the treated animal.

“The levels of use of the various medicines available to treat lice fluctuate depending upon the effectiveness of each product, and the treatment strategies adopted by fish farm operators and vets involved in the treatment of the farmed fish. Provided that the amount of medicine used in each individual treatment event does not exceed the limits imposed by SEPA, then the environment should remain protected.”

Sunday Herald

Please note - We cannot comment on a data set provided by a third party even where that data has originated from SEPA. We would require to carry out cross-checking on this data. We can provide answers to your questions from our raw data however our relevant staff have been busy with other operational demands and have unfortunately not been able to do this within your timescale. The following has been provided to explain how we initially calculated the raw data.

- **Are those numbers right, approximately right, or wrong?**

SEPA’s approach to setting chemo-therapeutent consent limits is based on the comparison of Environment Quality Standards (EQSs) with predictive modelling results. Environmental Quality Standards for in-feed chemicals may be applied in two main ways:

1. A non consent-limiting concentration of chemical permitted within the seabed sediment which, if exceeded, may trigger a requirement for enhanced monitoring. The “trigger value”.
2. A consent-limiting concentration of chemical permitted within the seabed sediment. The “limit value”.

SEPA applies these two separate levels of EQSs over two different areas.

1. The trigger value is applied in the near-field, to protect sediment worker species below and in close proximity to the cages. For Slice samples this is known as the cage edge sample.
2. The limit value is applied in the far-field, to protect all other species at greater distance from the cages. This is known as the AZE sample.

Only this second value is a true “EQS” set with the aim of protecting the environment from the effects of fish farming and thus only breaches of this standard (0.763µg/kg wet weight of emamectin benzoate), as opposed to the near field of trigger value should be considered as EQS breaches.

- **How many fish farms have breached EQSs?**

Assessment of fish farm sediment samples against an EQS is based on the calculation of the mean concentration of residues in the samples, derived by taking the three replicates at any station and calculating a mean value. Samples taken at the AZE (referred to in the Excel Spreadsheet as 100m or 150m samples) with an average residue of more than 0.763µg/kg of emamectin benzoate are considered to be above EQS values. Thus, samples from the far field stations at 100 or 1150m from the cages with mean values above 0.763µg/kg of emamectin benzoate will be considered breaches of EQS.

- **How many lochs have been contaminated in breach of the limits?**

The number of sites with emamectin benzoate levels above EQS at the edge of the allowable zone of effects is established as detailed above. This provides information on the situation at the edge of the allowable zone of effects but it is not possible to extrapolate this over the whole area of the sea loch as in general terms the accumulation of such residues in sediments will be greatest within the vicinity of the AZE and is unlikely to extend a significant distance into any water body beyond this point. Furthermore, the timing of sampling for Slice is set to coincide with the time at which the maximum quantity of the residue is present on the seabed. SEPA has determined that emamectin benzoate breaks down into “non-toxic” sub-compounds within a defined half-life period and following this sampling period the quantity of residue on the seabed will continue to reduce. The sample results therefore represent a “worst-case” in terms of the concentration of residues present.

- **How many of those have resulted in enforcement action?**

SEPA’s enforcement philosophy is to use the minimum amount of formal regulation necessary to secure compliance. The form of enforcement action, alone or in combination, which will be used will differ depending on the particular nature of the non-compliance, the harm caused and the history of the responsible person in question. An exceedance of an EQS in the environment is not in itself indicative of non-compliant or illegal activity on the part of the operator and thus an EQS breach would not necessarily precipitate significant enforcement action unless, for example there was evidence that it had occurred as a result of the operator breaching the

conditions in the licence for a fish farm relating to medicine use. Where cases are referred to the PF these will be reported where the case results in a conviction. At the moment we have two licences in which Slice conditions have been varied, in line with SEPA's Marine Cage Fish Farm CAR Licence Review document, following the submission of sea louse residue monitoring results.

From: <REDACTED>

Sent: 21 February 2017 15:34

To: <REDACTED>@gov.scot'; <REDACTED>@gov.scot'

Cc: <REDACTED>@gov.scot'; CommunicationsRuralEconomy&Environment@gov.scot; <REDACTED>; <REDACTED>

Subject: Fish farm enquiries

Hi, to make you aware – we have received a couple of enquiries about fish farms this week.

The Scotsman –

The journalist said that 58 salmon farms were rated by SEPA as 'poor' in 2015 which is up from 37 in 2014. Failures included unsatisfactory seabed surveys, overdosing of chemicals and excessive chemical residues.

The journalist is looking for comment on the following points –

- *It seems some sites have failed for three years in a row. Can you tell me what action, if any, has been taken against the offenders - have there been any prosecutions?*
- *Can you explain the dangers to human health, farmed fish or the wider marine environment from excessive levels of some chemicals - eg ememectin, calicide, azamethisphos - in either the seabed or the fish.*

Sunday Herald –

Can Sepa please say how many fish farms it reckons have breached EQSs, and how many lochs have been contaminated in breach of the limits? And can Sepa say how many of those have resulted in enforcement action?

When I have a response I'll share with you for info.

Regards,

<REDACTED>

<REDACTED>

<REDACTED>

Scottish Environment Protection Agency | Strathallan House | Castle Business Park | Stirling FK9 4TZ

T.: <REDACTED>

e.: [e.: <REDACTED>@sepa.org.uk](mailto:<REDACTED>@sepa.org.uk)

w.: www.sepa.org.uk

From: <REDACTED> <<REDACTED>@sepa.org.uk>
Sent: 03 March 2017 14:46
To: <REDACTED> <<REDACTED>@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>
Subject: Sunday Herald Fish farms enquiry
Importance: High

<REDACTED>

<REDACTED> Out of Scope

Could one of you, or a colleague, please help with queries for an article I am researching for the Sunday Herald this weekend? I would be grateful if you could get back to me as soon as possible before noon tomorrow (Friday), and I would appreciate an acknowledgement of this email.

Information released this week to the anti-fish-farming campaign <REDACTED> suggests the following:

<REDACTED> Out of Scope

- Emails from August 2016 show that SSPO asked Sepa to reconsider an article that it was intending to publish on the regulation of emamectin, in the light of a new scientific report SARF PAMP-2. The [SARF report](#) concluded that the use of emamectin “was associated with substantial, wide-scale reductions in both the richness and abundance of non-target crustacea”. SSPO argued that Sepa’s proposed article “could undermine commercial confidence in the industry” and could lead to media coverage that would “probably damage all of our reputations”. SSPO chief executive, Scott Landsburgh, told A’hearn in an email on 8 August 2016 that the proposed article would “become the centre of media attention and will make it difficult for some accommodation in the future” and urged publication to be reconsidered. As far as I can see, there is no record of Sepa having published such an article in 2016, suggesting that it agreed to SSPO’s suggestion not to publish.

Following the article in the Sunday Herald last weekend about emamectin pollution of sea lochs and the release of the above information to <REDACTED>, Sepa yesterday [published an article](#) on its plans for regulating the fish farming industry. It said that the SARF report published in August had found an unexpected association between impacts on the marine environment and the use of emamectin. It continued:

"Based on this new evidence, SEPA is reviewing all fish farm licences permitting the use of SLICE, tightening conditions for the medicine’s use after discussions with VMD. We are beginning the issuing of these new licences this week, and this will be completed by the end of April. This restriction will remain in place while SEPA and the industry carry out further research to either confirm or confound the apparent link between SLICE use and possible environmental effects.

"We are also now considering the findings of a review we commissioned of the environmental quality standards for SLICE to ensure they are up to date and provide adequate environmental protection. In this way, the impacts of sea louse medicines are monitored by SEPA on an ongoing basis, and corrective regulatory actions taken where necessary."

So in essence it looks like the fish farming industry, <REDACTED> Out of Scope - successfully persuaded Sepa to stop the publication of an article about regulating emamectin in August 2016. But, after publicity and freedom of information requests, Sepa decided this week to publish a new policy tightening up the regulation of emamectin from fish farms.

<REDACTED> Out of Scope

- 1) Can Sepa confirm that it did bow to pressure from SSPO in August 2016 and withdraw the planned publication of a proposed article on the regulation of emamectin? And can Sepa respond to likely criticisms that this was inappropriate?**

SEPA considers a wide range of views in its decision-making process, but the final decision is always our own, as it was in this case.

- 2) Can Sepa explain why it decided to publish a new policy on emamectin this week? Would Sepa like to comment further on the reasons behind the move, and say exactly what new restrictions are being placed on the use of emamectin? Is it being banned in any areas?**

Sector Plans are a core component of delivery of our Regulatory Strategy *One Planet Prosperity*, published last August. This week we began the roll-out of communications about that approach, with a focus on aquaculture as the first sector we are considering in detail. We have not published a new policy on emamectin, but are tightening SEPA licences to more closely reflect the product conditions of use, and are also strengthening the approval processes contained within our licences. We have not banned the product's use.

- 3) Sepa says it is "reviewing all fish farm licences permitting the use of SLICE". Can you say roughly how many that is?**

There are currently around 360 licences permitting the use of SLICE.

<REDACTED>

From: <REDACTED> <<REDACTED>@sepa.org.uk>

Sent: 21 March 2017 17:15

To: <REDACTED> <<REDACTED>@gov.scot>; <REDACTED> (<REDACTED> <<REDACTED>@gov.scot>

Cc: <REDACTED> <<REDACTED>@gov.scot>; Communications Rural Economy & Environment

<CommunicationsRuralEconomy&Environment@gov.scot>; <REDACTED> <<REDACTED>@gov.scot>

Subject: Responses to latest fish farm enquiries

Hi, to make you aware – we've received a few further media enquiries regarding fish farms. The following responses have been sent to the publications. Please see below for information.

Regards,
<REDACTED>

<REDACTED> Out of Scope

2 – STORNOWAY GAZETTE – Request for comment on press release issued by Outer Hebrides Against Fish Farms.

Our response –

SEPA Chief Executive, Terry A'Hearn said: "I believe that what the public wants from SEPA as a regulator is action, not words, and that has been our priority. Our two key actions were to review licence limits for all fish farms, which we have started, and to commission further scientific research to provide additional, robust evidence to inform future action in relation to the use of SLICE. SEPA's approach to regulation is clearly set out in our Regulatory Strategy, published last August, which we will implement independently, objectively and accountably. This is our focus. It's for others to debate the broader opinions being expressed."

<REDACTED> Out of Scope

<REDACTED>
<REDACTED>

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

From: <REDACTED> <REDACTED>@Sepa.org.uk>
Sent: 13 April 2017 10:49
To: <REDACTED> <REDACTED>@gov.scot>
Subject: SEPA update - DZR & EQS review

<REDACTED> please note details as discussed yesterday, my apologies I am working off iPhone today and finished for a weeks leave.

EMAMECTIN BENZOATE EQS REVIEW REPORT

SEPA are now completing the necessary steps to progress with the peer review process for the WRC review report of Emamectin Benzoate EQS. A recommendation in this report is to implement a revised standard; a substantial tightening of the current EQS for this chemical. SEPA are adopting a precautionary approach as we do in other situations where a reviewed EQS recommends an amendment to a standard. This means that for all new site applications and for variation applications

where an increase in use of this chemical is requested we will be adopting the proposed EQS standard in our determination of such applications, in terms of technical variations providing the new EQS does not allow for an increase Emamectin Benzoate, then the original licence volumes shall be maintained, unless ecological impact is evidenced or we have particular site specific concerns. For existing sites the current standard remains in place and will do so at this time provided no relevant ecological impact is evidenced at site.

SEPA verbally advised SSPO (Scottish Salmon Producers Organisation) of the above at a meeting on Friday 7 April and are contacting all current applicants of this approach. A regulatory position statement will be completed and made available when we instruct the peer review process.

SEPA are also in discussions with VMD on this matter.

<REDACTED> Out of Scope

Regards
<REDACTED>

<REDACTED>
<REDACTED>
<REDACTED>