

MEMORANDUM

From: [REDACTED]
Location: APHA Inverness
Tel: [REDACTED]
Mobile: [REDACTED]
Date: 06/09/2018

To: [REDACTED], VLS
Cc: [REDACTED], VA

Re: **SALMON DISPOSAL AT WHITESHORE COCKLES**
Whiteshore, Kyles, Paible, Isle of North Uist, HS6 5DY
Map ref: NF754672 ABP reg number U1141549 (haulier)

Background

1. The site at Whiteshores has been operating as a burial site for dead salmon since 2004. I have only visited the site once on the 12th December 2012 with Mr [REDACTED], CnES and [REDACTED], SG as a fact finding visit (copy of report attached).
2. The premises is not approved under the ABP legislation but is a registered as a haulier (U1141459) dated 04/03/2013.
3. A letter from Scottish Government dated 3rd September 2013 outlined the current situation confirming that the operation did not comply with the remote area derogation and was not under official supervision as a licenced landfill site and a deadline of the 1st January 2014 was set for fish farms to stop using the site.
4. The site has continued to operate on the understanding that it would stop once it had full ABP approval as a method 1 processing plant.

Current situation

1. A completed APBR07 application for approval to process cat 2 ABP using method 1, was received in June 2015.
2. The applicant, Mr [REDACTED] was intending to have the infrastructure completed in March and the processing unit installed by June 2015.
3. To date the shed and infrastructure has been completed and on order placed for the processor which should arrive in 3-4 months. After installation the plant requires validation that will require at least 30 days of operation to be completed and a site

visit by APHA therefore the earliest the plant could be fully approved by would be the end of January 2019.

4. The fish farming industry are of the belief that the site has a derogation to bury salmon and that it is a legal method for the disposal of salmon morts.

Options

1. As the premises is not ABP approved or operating as a licenced landfill site, it should be stopped from operating by the local authority, Comhairle nan Eilean Sair as soon as practical.
2. The site continues to operate until it has full ABP approval as a processing plant.
3. A date is set by which the premises must stop operating as a burial site regardless of the stage of ABP approval.

Recommendation

1. With the caveat that any decision would have to be made in consultation with the Scottish Government and Comhairle nan Eilean Sair, I would recommend option 3 as the most proportionate option.

██████████, VO

[REDACTED]

[REDACTED]

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**Information for inclusion in FoI on burial of salmon farm mortalities at
Whiteshore Cockles, North Uist.**

In January 2016 the Scottish Government applied to the European Commission for a derogation to allow the continued burial of salmon farm mortalities at Whiteshore Cockles. The derogation was permitted on the grounds that the site operator undertook to install a disposal system that meets the requirements of the animal by-product regulations; burial would continue only until installation was complete. The installation has taken longer than originally planned, Scottish Government understand that the disposal site will be operational later this year.



Redwood Court, Tytherington Business Park,
Macclesfield, Cheshire, SK10 2XH

Tel: +44 (0)1625 666798

hello@tidyplanet.co.uk
www.tidyplanet.co.uk

Whiteshore Cockles
Whiteshore
Kyles, Paible
Isle of North Uist
HS6 5DY

22nd February 2019

Dear [REDACTED],

Further to my telephone call last week, I wanted to provide you with a detailed update on the current state of the order for the fish mort system.

Following your order placement last September where we had agreed on the supply of a system to process up to 20 tonnes of fish mort per day, we completed the detailed design of the system based on this requirement and placed a number of orders for the individual items of equipment that make up the fish mort to fertiliser system. Many of these items were on 5 – 6 month delivery and we now have these in our workshop.

However following the higher incidence of mortality that you experienced at the end of last where you on occasion received up to 40 tonnes of mort in 24 hours and over 1000 tonnes in one month, we had to suspend the work on the dryers as they would not be able to process more than 20 tonnes per day. In addition, as confirmed by Animal Health, you are not able to store mort for longer than 48 hours following receipt to your site and this mean that we had to re-design the main part of the drying and separation system to move from a fixed capacity batch type system to a semi continuous system that provides you with a significantly increased capacity of up to 50 tonnes per day.

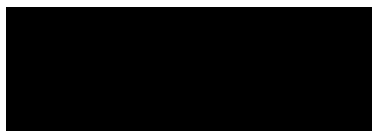
As the system is bespoke to your requirements and is significantly smaller than a commercial fish waste processing facility and yet substantially larger than a farm based system, we have had to design a continuous cooker and batch dryer from scratch and this has taken much longer than anticipated as there is no pre-existing equipment to base our design on.

We have had to test each stage of the process to ensure that it will be as efficient as we need it to be as there is a limited supply of electricity and other services on the site and now that we have completed this, we have finalised the new designs and gone back to our manufacturers for lead times.

I'm very sorry to inform you that the best lead times we can get for this specialised equipment manufacture is 28 weeks, as the designs have to be approved by an international body for pressure rated equipment and their lead times have been extended as a result of a rush for approvals before the end of March in case there are any implications following Brexit.

I wish to assure you that we are doing everything that we can to reduce the manufacturing times in order to minimise the delay, but this is the result of the need to increase the capacity of the equipment whilst delivering a solution that meets your requirements.

Kind regards,



[REDACTED]
Managing Director
Tidy Planet Limited





T: [REDACTED]
E: [REDACTED]

Mr [REDACTED]
Whiteshore Cockles Ltd
Whiteshores
Kyle
Pailble
Isle of North Uist
HS6 5DY

4 October 2018

Dear Mr [REDACTED]

I am writing to you to seek an update on the progress you are making towards installing a fish waste drying system at Whiteshore Cockles Ltd.

As you will be aware, when we contacted the European Commission about seeking an extension to continue disposing of salmon mortalities by burial at Whiteshore Cockles Ltd we initially sought a 6 month derogation. This derogation was granted but the timing has well exceeded the original 6 months. The Scottish Government will not allow the burial of fish waste to continue indefinitely at Whiteshore Cockles Ltd.

To keep Scottish Ministers updated, I would be grateful if you could provide me with a timeline that sets out the progress you have made so far and when you expect the system to be operational. The timeline should contain a breakdown of important milestones, such as planned changes to infrastructure plus equipment delivery and installation dates. Validation time by the Animal and Plant Health Agency for approving the fish waste drying system under the Animal By-Products (Enforcement) (Scotland) Regulations 2013 should also be considered.

Please could you provide me with this information by 26 October 2018. A copy of this letter has been sent to Comhairle nan Eilean Siar, the Scottish Environment Protection Agency and the Animal and Plant Health Agency.

Yours sincerely

[REDACTED SIGNATURE]

Animal Health – Disease Prevention





T: [REDACTED]
E: [REDACTED]

Mr [REDACTED]
Whiteshore Cockles Ltd
Whiteshore
Kyles, Paible
Isle of North Uist
HS6 5DY

28 October 2019

Dear Mr [REDACTED]

**ANIMAL BY-PRODUCTS (ENFORCEMENT) (SCOTLAND) REGULATIONS 2013
DISPOSAL OF FISH WASTE BY BURIAL IN NORTH UIST**

Thank you for your email of 9 October requesting an extension to the derogation to allow Whiteshore Cockles Ltd to continue to bury fish waste as per the current practice.

You had indicated that the Scottish Environment Protection Agency (SEPA) requires your fish waste drying equipment to have a permit for "Part A" activity under the Pollution Prevention and Control (Scotland) Regulations 2012. SEPA have confirmed that no animal by-products can be processed until a PPC permit is in place. From my discussions with my colleagues in the Animal and Plant Health Agency (APHA), I understand that SEPA will take a minimum of 4 months from receipt of a satisfactory application to issue a PPC permit.

Going on your original timescale that your equipment could be installed and operational in November, your site will not have SEPA consent to operate until May/June 2020 at the earliest. As SEPA consent is needed before your site can be approved under the Animal By-Products (Enforcement) (Scotland) Regulations 2013, we can confirm that authority is granted to continue to bury fish waste on site with the condition that burial ends when your site is granted a PPC permit.

A copy of this letter has been sent to Comhairle nan Eilean Siar, SEPA and the Animal and Plant Health Agency.

Yours sincerely

[REDACTED SIGNATURE]

Animal Health – Disease Prevention

