

From: Redacted

Sent: 12 May 2021 12:47

To: Redacted

Subject: Sea Lice Reporting - Disclosure of Possible Offence

Sea Lice Reporting - Disclosure of Possible Offence

CC: **Redacted** (Salmon & Trout Conservation Scotland), **Redacted** (Salmon & Trout Conservation Scotland) **Redacted** (BBC Scotland)

Dear **Redacted**,

I am writing to formally report the possible misreporting of sea lice data by The Scottish Salmon Company (TSSC) at Meall Mhor marine cage fish farm on Loch Fyne and that an offence may have taken place under Section 2 of the Aquaculture and Fisheries (Scotland) Act 2007.

I received intelligence from someone associated with the salmon farm that sea lice numbers may not be being reported in accordance with the relevant act (Section 2 of the Aquaculture and Fisheries (Scotland) Act 2007) and that a criminal offence may be taking place.

(Section 2 of the Aquaculture and Fisheries (Scotland) Act 2007)

Information: offences

(1) A person commits an offence who—

(b) in purported compliance with a requirement of an order under section 1 knowingly provides any information or compiles a record which is false in a material particular,

I attended the site on 24 April 2021, between the hours of 09:00 and 20:00hrs. (Calendar Week 16). Police Officers also attended between 19:00hrs and 20:00hrs, a report can be provided to confirm.

I gathered extensive drone and underwater footage during this time. The underwater footage was documented using high resolution slow-motion cameras specifically set-up to reveal the sea lice loading on the salmon contained within the farm, for the purposes of reviewing sea lice loading afterwards. I have provided samples of this, as well as images, below. The raw footage with proof of time and exact location (accurate to 5m) can be provided.

I subsequently asked for an independent assessment of that underwater footage. This was provided by a trained employee of another salmon farming company. This was to confirm species of sea lice present, life stages, numbers of females and whether or not the levels of infestation were commensurate with previous counts reported by TSSC for the salmon farm.

This individual confirmed the sea lice present were Leps (and so should be counted for the purposes of reporting weekly sea lice numbers), were present in high numbers at all life stages, with significant numbers of gravid and non gravid females and that the numbers observed were significantly in excess of that which the sea lice counts being previously reported would suggest.

It is therefore extremely difficult to understand how TSSC could report a figure of 0.1 average sea lice per fish, given what is clearly much higher levels than that in this footage.

The sea lice counts reported by TSSC for this salmon farm are as follows:

- Week 13: 1.09
- Week 14: 0
- Week 15: 0.07
- Week 16: 0.1

My footage was collected at the end of Week 16 and so is relevant only to the figure of 0.1 reported for that week. The life cycle of sea lice is such that it is impossible that the presence of females in such numbers could have occurred over the course of one or two days in that week.

The mathematical basis for a salmon farm reporting a count of 0.1 (Gravid/Non Gravid Females) is that exactly/only one Gravid/Non Gravid Female Leps sea lice must be present on every multiple of 10 fish sampled.

The images and footage which I have supplied below, show much higher levels of the relevant sea lice. While some sea lice are very obvious, many require a degree of experience to identify. However, almost every fish shows tell tales of mobiles and adults behind the dorsal and adipose fins, revealed by the white scarring. Indeed it is almost impossible to find a fish in the footage that doesn't have multiple gravid females present. This is in stark contrast to a sea lice count which equates to no more than a single gravid/non gravid female per 10 fish.

While individual images can face the accusation of being selective, this is overcome by the raw footage, of which there is nearly 60mins and thousands of fish. I am more than happy to make all of the raw footage available to the FHI, if requested. This can ultimately be viewed frame by frame in high resolution and sea lice counted on individual fish.

It is the case that I was only able to directly observe sea lice abundance in three cages out of nine that were stocked. Of course I recognise the possibility that sea lice levels were different in the other cages. However, very detailed low level drone footage of those cages has numerous indicators that the fish were in a similar state.

Given the possibility that a criminal offence may have taken place, coupled with the strength of documentary evidence and the opinion of a corroborating independent expert, I would expect the FHI to investigate this making full use of all the powers available to it.

Those being:

1. An unannounced inspection of the site.
2. An enhanced (SLA) sea lice inspection by a senior FHI inspector. Including a supervised count of sea lice on salmon in all remaining cages.

3. Collection and copying of documents required to be held by the operator under the Record Keeping Order 2008, which show the numbers of fish samples in Week 16, when they were sampled, what counts were observed and who carried out the counts. (I would expect this documentation to be copied and held by the FHI so that it is accessible under FOI at a later date)

As mentioned I have substantial amounts of ultra high resolution footage which I can make available to you and your teams.

I look forward to seeing what action the FHI takes.

Yours

Redacted

HI-RES IMAGES &

FOOTAGE*: <https://drive.google.com/drive/folders/146JioTc0pZiOpLOG4yETdYz2ncSAiJ3d?usp=sharing>

*Footage needs to be downloaded to view at highest quality and detail.

SAMPLE IMAGES





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