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Enclosure 01 – Email from SEPA to Scottish Government.

**From:** [REDACTED]@sepa.org.uk>

**Sent:** 22 May 2020 11:01

**To:** [REDACTED]@gov.scot>; [REDACTED]

[REDACTED]@gov.scot>;

[REDACTED]@gov.scot'

[REDACTED]@gov.scot>

**Cc:** [REDACTED]@sepa.org.uk>; [REDACTED]

[REDACTED]@sepa.org.uk>

**Subject:** Aquaculture media coverage - for information

Good morning,

For information given policy interests please find below SEPA's response to an enquiry from The Ferret regarding aquaculture and formaldehyde.

Peter Pollard, Head of Ecology at the Scottish Environment Protection Agency, said:

"Fish farm operators require an authorisation from us before they can use formalin to treat their fish. When granting authorisation, we place strict limits on the quantities that can be used. The limits are set to keep discharges to levels that the receiving rivers and lochs can accommodate without compromising environmental quality standards. We routinely carry out audits of farms authorised to use formalin to check that operators are complying with the limits."

"We share an aspiration with the sector for a future where fish farmers are increasingly less reliant on chemical and medicine based controls."

NOTES:-

- Formalin (active ingredient, formaldehyde) is used to treat a range of conditions including white spot and bacterial gill disease.
- Discharges to rivers and lochs from fish farms are controlled under the Water Environment (Controlled Activities) (Scotland) Regulations 2011
- Formaldehyde, the active ingredient of formalin, is readily biodegradable with no potential for bioaccumulation in the aquatic environment.
- In Scotland, the environmental standards for the protection of freshwater are 5 micrograms per litre (ug/l) (annual average) of formaldehyde and 50ug/l (maximum allowable concentration).
- Strict limits on the use of products containing formaldehyde (e.g. formalin) are set using river and fresh water loch modelling to identify the environmental capacity of each water course.
- SEPA audits these authorisation limits as part of routine compliance checks.

SEPA can confirm an investigation is ongoing into a complaint regarding the use of formaldehyde at Loch Tralaig fish farm.

Kind regards

[REDACTED]

Scottish Environment Protection Agency, Strathallan House, Castle Business Park, Stirling, FK9 4TZ  
t: [REDACTED] e: [REDACTED]@sepa.org.uk web: [www.sepa.org.uk](http://www.sepa.org.uk)

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

Registered office: Strathallan House, Castle Business Park, Stirling FK9 4TZ. Under the Regulation of Investigatory Powers Act 2000, the email system at SEPA may be subject to monitoring from time to time.

Dh'fhaodadh gum bi am fiosrachadh sa phost-d seo agus ceanglachan sam bith a tha na chois dìomhair, agus cha bu chòir am fiosrachadh a bhith air a chleachdadh le neach sam bith ach an luchd-faighinn a bha còir am fiosrachadh fhaighinn. Chan fhaod neach sam bith eile cothrom fhaighinn air an fhiosrachadh a tha sa phost-d no a tha an cois a' phuist-d, chan fhaod iad lethbhreac a dhèanamh dheth no a chleachdadh a-rithist. Mura h-ann dhuibhse a tha am post-d seo, feuch gun inns sibh dhuinn sa bhad le bhith cur post-d gu [postmaster@sepa.org.uk](mailto:postmaster@sepa.org.uk)

Oifis chlàraichte: Taigh Srath Alain, Pàirc Gnothachais a' Chaisteil, Sruighlea FK9 4TZ. Fo Achd Riaghladh nan Cumhachdan Rannsachaidh 2000, dh'fhaodadh gun tèid an siostam puist-d aig SEPA a sgrùdadh bho àm gu àm.

Enclosure 02 – Email to Scottish Government.

**From:** MS Communications

**Sent:** 27 May 2020 11:38

**To:** [REDACTED] yahoo.com

**Subject:** RE: E - Formaldehyde in the lochs - [REDACTED]

Good morning [REDACTED]

Thank you for your email which was passed onto ourselves from the Central Enquiry Unit.

I have now forwarded your email onto the relevant department within Marine Scotland. They will be in contact in due course, although there may be delays due to our response to COVID commitments.

MS Communications

[Marine Scotland Directorate](#)  
[The Scottish Government](#)

In 2020 we are showcasing Scotland's coasts, rivers, canals, lochs and inland waters and the work we are doing to protect our marine environment and wildlife.

Join the conversation #YCW2020



**From:** [REDACTED] yahoo.com>

**Sent:** 24 May 2020 14:13

**To:** Central Enquiry Unit <[CEU@gov.scot](mailto:CEU@gov.scot)>

**Subject:** Formaldehyde in the lochs

Hello:

I'm writing from [REDACTED] I am disheartened and angry about the situation described in this article, which I have shared freely on social media...

[Toxic fish farm pesticide polluted ten lochs across Scotland](#)



1.1 Pkte bod ni l aope è a l k hpa` paj  
lk\_do] \_rkoo O\_kp] j`

Ten lochs across Scotland have been polluted by a toxic pesticide used by fish farms to control fungus, parasites and disease.

The government simply must do more to protect the natural assets in its care!

Sincerely,



Sent from Yahoo Mail on [redacted]

Enclosure 03 – Scottish Government emails.

**From:** [REDACTED]  
**Sent:** 11 June 2020 14:09  
**To:** [REDACTED] gov.scot>  
**Cc:** [REDACTED] gov.scot>  
**Subject:** RE: Formalin clarification

Thank you [REDACTED]

This is useful.

[REDACTED]  
Regards,

[REDACTED]  
Marine Scotland – Science  
Scottish Government | Marine Laboratory, PO Box 101 | 375, Victoria Road | Aberdeen AB11 9DB  
Tel: +44 (0)131 244 [REDACTED]  
S/B: +44 (0)131 244 [REDACTED]  
Mob:+44 (0)777 [REDACTED]  
Fax: +44 (0)1224 [REDACTED]  
e: [REDACTED] gov.scot  
w: <http://www.scotland.gov.uk/marinescotland>

**From:** [REDACTED] gov.scot>  
**Sent:** 11 June 2020 12:19  
**To:** [REDACTED] gov.scot>  
**Cc:** [REDACTED] gov.scot>  
**Subject:** Formalin clarification

Hi [REDACTED]

As discussed, a bit of background to the roles in relation to formalin. This is my understanding of the current situation.

Restrictions on the use of formaldehyde changed from 1 January 2016 when it was classified as a category 1B carcinogen. The regulatory roles are complicated as formalin can be administered as a medicinal treatment or as a biocide e.g. for disinfection.

The use of formalin as a medicinal treatment falls under the remit of the Veterinary Medicines Directorate (VMD). There are currently no formalin treatments authorised for fish within the UK i.e. no companies have a UK marketing authorisation. However, there are authorised products within the EU which can be brought into the UK under a Special Import Certificate (issued by the VMD). These products require to be prescribed by a veterinary surgeon. Formalin administered on a farm as a medicinal treatment requires to be recorded in a treatment record in accordance with



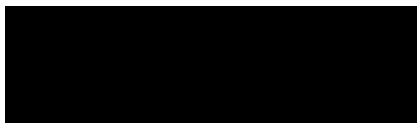
the Veterinary Medicines Regulations 2013. During inspections by the Fish Health Inspectorate (FHI), treatment records are inspected and recently administered treatments are recorded in case information. There is no requirement for farms to report medicinal treatments to the FHI.

The use of formalin as a biocide falls under the remit of the Health and Safety Executive (HSE). Formalin administered as a biocide does not require to be recorded in the treatment/medicine records. The FHI have no remit in relation to formalin administered as a biocide. Whilst there is no requirement to record biocide use in the treatment records some farms do record it in this way. This has perhaps led to some confusion regarding whether a record relates to a medicinal treatment or a biocide application.

SEPA licence activities under the Water Environment (Controlled Activities) (Scotland) Regulations 2011. The licence will specify which substances or products are permitted to be used and may include conditions for use. This is based on the substance or product itself, rather than how it is administered. SEPA will be able to advise on any reporting requirements they have for formalin use.

Happy to discuss.

Cheers



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

Tel: +44 (0)131 [redacted]

S/B: +44 (0)131 [redacted]

e: [redacted]@gov.scot

w: <https://www.gov.scot/marine-and-fisheries/>

In 2020 we are showcasing Scotland's coasts, rivers, canals, lochs and inland waters and the work we are doing to protect our marine environment and wildlife. Join the conversation #YCW2020



Enclosure 04 – Email to Cabinet Secretary for the Environment, Climate Change and Land Reform.

**From:** [REDACTED]@issf.org.uk <[info@issf.org.uk](mailto:info@issf.org.uk)>

**Sent:** 12 August 2020 15:18

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

<[CabSecECCLR@gov.scot](mailto:CabSecECCLR@gov.scot)>

**Cc:** Scottish Ministers <[Scottish\\_Ministers@gov.scot](mailto:Scottish_Ministers@gov.scot)>

**Subject:** Formaldehyde use in freshwater fish farms

Please find attached a letter from Inside Scottish Salmon Feedlots for the attention of the Cabinet Secretary for Environment, Climate Change and Land Reform.

Please don't hesitate to contact me if you require any further information.

Yours sincerely,

[REDACTED]

--

[REDACTED]

[www.issf.org.uk](http://www.issf.org.uk)

[REDACTED]

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## Enclosure 04.1 – Attachment.

Roseanna Cunningham  
Cabinet Secretary for Environment, Climate Change and Land Reform  
scottish.ministers@gov.scot

Gillian Martin  
Convenor, Environment, Climate Change and Land Reform Committee  
[ecclr.committee@parliament.scot](mailto:ecclr.committee@parliament.scot)

12 August 2020

Ref: Formaldehyde use in freshwater fish farms

Dear Roseanna & Gillian,

Alerted by local community groups as well as Freedom of Information investigations it was reported in the media that salmon farming companies have been discharging large quantities of Formaldehyde into freshwater lochs in the North and West of Scotland, in a largely uncontrolled and unrestricted manner. Given the chemical is classified as “cancer causing” as well as being toxic to ecosystems there is considerable, and understandable, concern about this activity on both public and environmental health grounds. As a leading campaigning organisation, critical of the environmental impacts of open cage salmon farming, we were approached by locals and community groups to seek support from the wider public in Scotland to call for a ban on the use of Formaldehyde in freshwater lochs by all fish farming companies until a public consultation on its safety and use can be held.

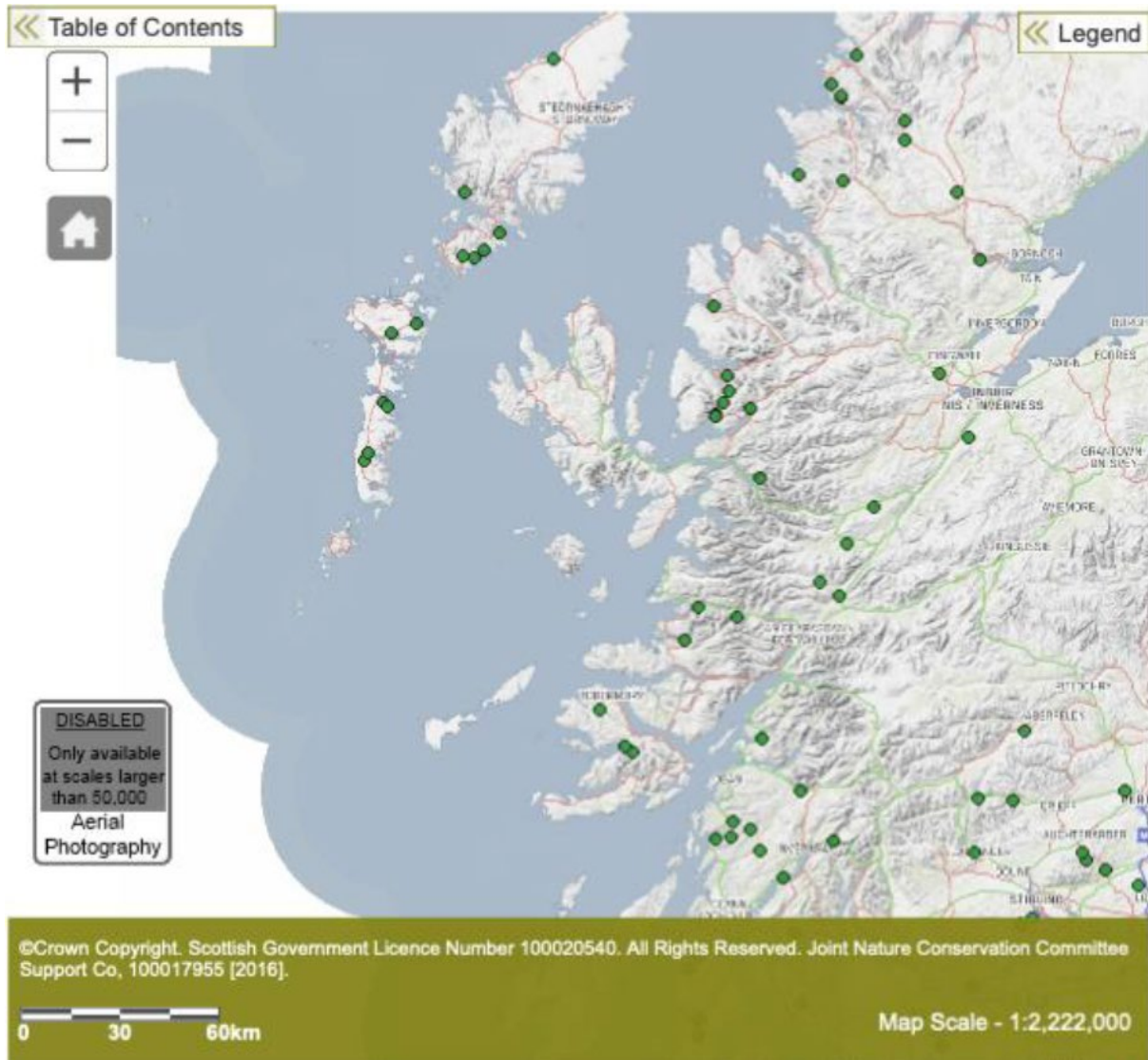
In a very short space of time 9,500 people have signed the following petition:

<https://you.38degrees.org.uk/petitions/stop-toxic-salmon-farm-chemicals-polluting-scottish-lochs>

Signatures were limited to UK residents only, who had to supply a valid post code and email address. The petition circulated organically on social media. Understandably there is scepticism about the veracity of signatures and the true level of support concerning online petitions. For our part we considered this a local issue and sought support on that basis, as a small community led campaign. For reference, more information on who signed the petition and how they interacted with it is contained in Appendix 1 below.

Minister, we now respectfully call on you to ban the use of Formaldehyde in freshwater lochs by all fish farming companies until a public consultation on its safety and use can be held.

We do of course recognise that Formaldehyde has been used in terrestrial farming for many years and also that the chemical does breakdown relatively rapidly in water. However, the effects of its use in a freshwater ecosystem in the quantities reported are not well researched or understood and many people would expect a more precautionary approach to have been taken and far greater consultation, given the potential for widespread use in a number of lochs and river catchments throughout North and West Scotland.



### Freshwater fish farms (North and West of Scotland)

Having reviewed existing literature it is not clear or well understood to what extent Formaldehyde on freshwater fish farms will directly impact wild fish, of any species, at the alevin, fry or parr stages or indeed aquatic invertebrates and other foundation organisms that are in proximity to freshwater fish farms. The extent to which its effects may cascade through an entire ecosystem, diminishing biodiversity, is therefore not well understood and the risks are unquantified.

In terms of the regulation of the use of Formaldehyde on freshwater fish farms it is not clear who the relevant authority is or if the substance is considered a medicine or a biocide for the purposes of regulation. There is no public register of use, nor a process for independently auditing the self-reported figures of fish farm operators contained in FOI disclosures. It is not clear under what circumstance operators are required to report use and whether this would capture all usage.

Clearly local communities are not routinely consulted on the introduction and usage of such chemicals. In locations where the public has a right to roam and no physical barrier exists between the use of a cancer causing chemical and the public, the lack of consultation seems inadequate. Wild swimmers for example, unaware of the issue, will no doubt freely interact with the chemical, potentially at high concentrations.

From a lack of proper regulation flows public uncertainty and mistrust. Without proper regulation of toxic chemicals, which should include independent and transparent monitoring and reporting, fish farming will never be able to allay the fears of the public about the use of this chemical in very large quantities in freshwater bodies, sometimes forming part of public water supplies.

This raises a wider question, the extent to which the Scottish Government has made any proactive efforts to better understand the environmental impact of fish farming on the freshwater environment since it was raised as a significant issue by the ECCLR committee in its detailed report on the Environmental Impacts of Salmon Farming (2018).

[https://www.parliament.scot/S5\\_Environment/Inquiries/20180305\\_GD\\_to\\_Rec\\_salmon\\_farming.pdf](https://www.parliament.scot/S5_Environment/Inquiries/20180305_GD_to_Rec_salmon_farming.pdf)

Overall the Committee concluded:

351. Scotland needs an ecosystems-based approach to planning the industry's growth and development in both the marine and freshwater environment, identifying where salmon farming can take place and what the carrying capacity of that environment is. A cohesive framework is needed.

347. The Committee is deeply concerned that the development and growth of the sector is taking place without a full understanding of the environmental impacts. The Committee considers an independent assessment of the environmental sustainability of the predicted growth of the sector is necessary

In respect of Research, the committee held the view that,

328. There are knowledge gaps in:

- the environmental impacts on freshwater lochs

In respect of Additional Environmental Issues, the committee noted that,

331. The Atlantic Salmon Trust (AST) considers the report largely neglects impacts in freshwater ecosystems through salmon smolt production intended for coastal aquaculture. In particular they suggest cage farming of fin-fish, particularly in freshwater lochs, has the potential to generate significant amounts of organic waste which can result in alterations to the fish population structure.

Convenor, it is for this reason that we are also formally calling for a firm commitment that there will be ample opportunity for scrutiny by the ECCLR Committee in both this and the next parliamentary session of the Scottish Government's progress in assessing and regulating salmon farming's impacts on the freshwater environment.

We trust you will give these requests the consideration they deserve given the concern of local communities, and I look forward to conveying your response in due course.


































Yours sincerely,



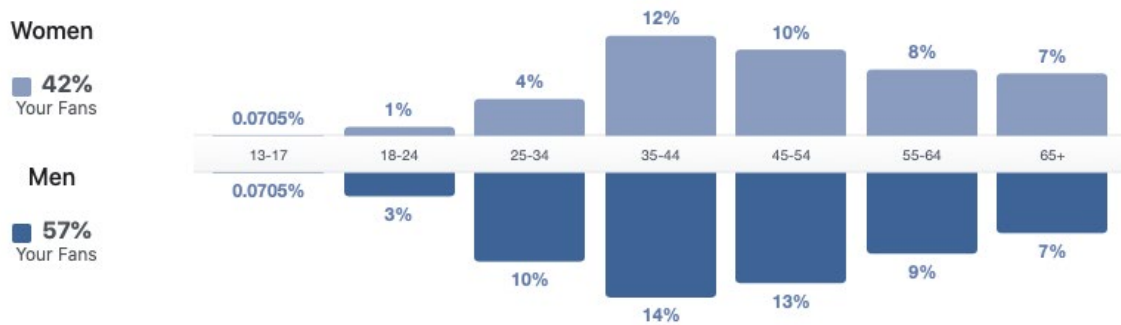
www.issf.org.uk

## Appendix 1

### Natural Weekly Engagement with all issf.org.uk content on Facebook

Page	Total Page Likes	From last week	Posts This Week	Engagement This Week
1  Scottish National Party (...)	321.1K 	0%	11	190.4K 
2  Surfers Against Sewage	139.2K 	▲0.2%	21	56.5K 
3  Scottish Green Party	61.4K 	0%	9	4.3K 
4  Scottish Labour Party	28.7K 	▼0.1%	4	1.8K 
5  Scottish Conservatives	28.1K 	▲0.1%	18	29.7K 
6  Scottish Liberal Democr...	4.4K 	0%	13	436 
YOU 7  Inside Scottish Salmon ...	4.3K 	▲1.1%	6	5.5K 
8  Scottish Sea Farms Ltd	3.4K 	▲0.9%	12	2.9K 
9  Mowi Scotland	3.2K 	▲0.3%	8	1K 
10  Proud to farm Scottish ...	1.7K 	▲0.1%	3	167 
11  Salmon Business	1.4K 	▲0.3%	39	623 

### Demographics of issf.org.uk Facebook page followers



Location of those engaging with sample Formaldehyde campaign content below

City	Your Fans
Glasgow, Scotland	171
Edinburgh, Scotland	157
London, England	143
Aberdeen, Scotland	104
Inverness, Scotland	104
Perth, Scotland	57
Stornoway, Scotland	49
Dublin, Ireland	45
Manchester, England	44
Dundee, Scotland	43
Falkirk, Scotland	33
Portree, Scotland	32
Stirling, Scotland	32
Elgin, Scotland	30
Fort William, Scotland	28
Paris, Île-de-France, Fr...	27
Belfast, Northern Ireland	27
Ayr, Scotland	25
Derry, Northern Ireland	24
Birmingham, England	24
Oban, Scotland	24
Pitlochry, Scotland	23
Bristol, England	23
Rouen, Haute-Norman...	23
Lamlash, Scotland	23

Formaldehyde campaign supporting organisations





Compassion in World Farming  
@farm.animals

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view 1 more comment



Compassion in World Farming  
20 June at 20:45 · 🌐

Last year in Scotland 22 tonnes of formaldehyde, which causes cancer, were poured into cages to disinfect farmed salmon. Please speak out and sign this petition.



YOU.38DEGREES.ORG.UK

### Stop Toxic Salmon Farm Chemicals Polluting Scottish Lochs

More than 22 tonnes of formaldehyde, which causes cancer and is used...

👍❤️👍 658

130 comments 353 shares

Like

Comment

Share

Most relevant ▾

Write a comment...

Sign Up

Send Message

4.5 out of 5 · Based on the opinion of 310 people



ABOUT COMPASSION IN WORLD FARMING

Campaigning for a food and farming revolution.

Compassion is recognised as the leading international farm animal welfare organisation. Our vision i...

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Invite your friends to like this Page

139,912 people like this

136,399 people follow this

179 check-ins



Patagonia ✓  
@PatagoniaUK

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Patagonia  
28 May · 🌐

SCREENING UPDATE: Hi everyone, this screening has now been rescheduled for next week, Wednesday June 10th - 7pm BST. Thanks -

Join us for a screening of "Artifishal" – a film about people, rivers and the fight for the future of wild fish.... See more



14,915 Views

Patagonia

10 June at 19:00 · 🌐

Like Page

Join us for a screening of "Artifishal" – a film about people, rivers and the fight for the future of wild fish.

Starting in North America and then heading ac... See more

Learn More

Community

See all

Invite your friends to like this Page

1,697,822 people like this

1,699,193 people follow this

About

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eu.patagonia.com/enGB/home

Clothing (brand)

Suggest Edits

Page transparency

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Facebook is showing information to help you better understand the purpose of a Page. See actions taken by the people who manage and post content.


Confirmed Page owner: Patagonia Europe Coöperatief U.A.

English (UK) · English (US) · Polski · Español · Português (Brasil)

Information about Page Insights data  
Privacy · Terms · Advertising · AdChoices · Cookies · More -  
Facebook © 2020



## Sample Formaldehyde campaign content and engagement



**Inside Scottish Salmon Feedlots**


8 June at 14:18 · 🌐

⋮

ACTION | If you've had enough of Norwegian billionaires using Scotland as a sewer, and the Scottish Government doing nothing about it, take two mins to take action against salmon farmers and make Scotland cleaner, healthier and happier, now and for our kids.

Sign the petition: <https://you.38degrees.org.uk/.../stop-toxic-salmon-farm-chemi...>

News Coverage: [https://bit.ly/formaldehyde\\_fish\\_farms...](https://bit.ly/formaldehyde_fish_farms...) See more



✔ **Get more likes, comments and shares**  
When you boost this post, you'll show it to more people.

**66,910**  
People reached

**8,510**  
Engagements

Boost Post

👍👎👏 208

55 Comments

355 shares

👍 Like

💬 Comment

➦ Share

👇

**Performance for your post**

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**66,910** People Reached

---

**28,813** 3-second video views

---

**1,469** Reactions, comments & shares ⓘ

<b>762</b> 👍 Like	<b>201</b> On post	<b>561</b> On shares
<b>9</b> ❤️ Love	<b>1</b> On post	<b>8</b> On shares
<b>4</b> 😂 Haha	<b>0</b> On post	<b>4</b> On shares
<b>7</b> 😲 Wow	<b>0</b> On post	<b>7</b> On shares
<b>19</b> 😞 Sad	<b>4</b> On post	<b>15</b> On shares
<b>38</b> 😡 Angry	<b>12</b> On post	<b>26</b> On shares
<b>270</b> Comments	<b>68</b> On Post	<b>202</b> On Shares
<b>360</b> Shares	<b>355</b> On Post	<b>5</b> On Shares

**7,041** Post Clicks

<b>435</b> Clicks to Play ⓘ	<b>609</b> Link clicks ⓘ	<b>5,997</b> Other Clicks ⓘ
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**NEGATIVE FEEDBACK**

<b>13</b> Hide post	<b>8</b> Hide all posts
<b>0</b> Report as spam	<b>0</b> Unlike Page

Reported stats may be delayed from what appears on posts

[Redacted] [Redacted]  
11 June at 09:14 · 🌐

Farming salmon in sea lochs is incredibly harmful/toxic to the environment. Please read this, sign the petition and stop buying farmed salmon. Thank you!

[Show Attachment](#)

5 Comments 1 share

Like Comment Share

[View 1 more comment](#)

[Redacted] [Redacted] most salmon in the shops is farmed and it does terrible harm to the local aquatic environment because of the food that they are fed and the chemicals that they are given to suppress disease. They harbour huge numbers of lice that go on to i... [See more](#)

1  
Like · Reply · 2w

[Redacted] replied · 4 Replies

[Redacted] Done 1

Like · Reply · 2w

[Redacted] likewise, signed. I haven't eaten salmon in years, farmed or otherwise. Firstly because of the damage it does, and secondly because it seems to me that pretty much all freshwater fish are riddled with parasites... even saltwater fish require some thought in selection and cooking..

2  
Like · Reply · 2w · Edited

[Redacted] replied · 6 Replies

[Redacted] The damage to wild salmon AND sea trout is undisputed by those in the know. [Redacted] have seen it for myself in the [Redacted]. The Scottish Parliament has to take action; how can they let this go on?

1  
Like · Reply · 2w

Comment as Inside Scottish Salmon Feedlots

  10 June at 13:36 · 🌐 ⋮

Please sign this petition to stop Norwegian billionaires polluting and destroying scottish lochs and fresh water!

[Show Attachment](#)

 Like  Share

 10 June at 11:55 · 🌐 ⋮

[Show Attachment](#)

 1 Comment 1 share

 Like  Comment  Share 

  Signed and shared  1

[Like · Reply · 2w · Edited](#)



 10 June at 10:35 · 🌐 ⋮

Hope this is ok to post but feel it's important to listen to and sign 😊

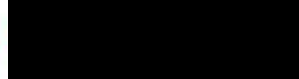
[Show Attachment](#)

   and 23 others 3 Comments 7 shares

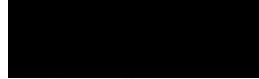
 Like  Share

 Signed  1

[Like · 2w](#)

 Signed

[Like · 2w](#)

 Signed

[Like · 2w](#)

[Redacted] 9 June at 08:45 · [Redacted]

Please support & sign the petition... shocking this is going on...

Show Attachment

[Redacted] and 4 others 2 Comments 1 share

Like Comment Share

[Redacted] Thanks [Redacted] xx

Like · Reply · 2w

[Redacted] Completely dead seabed for around 400 metres around each cage.



😱 2

Like · Reply · 2w

[Redacted] holy sh\$t! When did you see that?

Like · Reply · 2w

[Redacted] Hi [Redacted] We didn't expect anything like this! [Redacted] the con... See more

Like · Reply · 2w

[Redacted] OMG that's crazy! Hope you're well anyhow! Are you still in [Redacted]

Like · Reply · 2w

[Redacted] well and [Redacted] now (well [Redacted] Life still great [Redacted] ?

Like · Reply · 2w

[Redacted] 8 June at 21:53 · [Redacted]

Take a moment to watch, learn and hopefully sign the petition  
<https://you.38degrees.org.uk/.../stop-toxic-salmon-farm-chemi...>  
Show Attachment

[Redacted] and 1 other 3 Comments

Like Comment Share

[Redacted] Signed 🙄🙄 literally you can't eat anything now without some billionaire poisoning us!! I feel an Erin brocokvitch coming on!

Like · Reply · 3w 1

[Redacted] replied · 2 Replies

[Redacted] Signed xx 🙄 1

Like · Reply · 2w

[Redacted] Signed x 🙄 1

Like · Reply · 2w

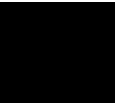
Write a comment... 🗨️ 📷 GIF 🗑️

[Redacted] 8 June at 21:48 · [Redacted]

Show Attachment

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Comment as Inside Scottish Salmon Feedlots 🗨️ 📷 GIF 🗑️

  8 June at 21:35 · 🌐



Open-cage salmon farming in Scotland's lochs and rivers is incredibly environmentally damaging - but the effects are hard to see as they impact aquatic and marine environments. The profitability of salmon farming means the large Norwegian-owned corporations enjoy light-touch environmental regulation from the Scottish Government. This case - the dumping huge quantities of formaldehyde into Scottish lochs - is just another line in a long list of extremely polluting behaviour fr...

[See more](#)

[Show Attachment](#)

   and 18 others 2 Comments 2 shares

---

 Like  Comment  Share 

 8 June at 21:21 · 🌐

Please take a couple of minutes to listen to  and his fantastic fight for change - especially if, like me, a piece of your heart is in The Highlands ❤️

[Show Attachment](#)

   12 7 Comments

---

 Like  Comment  Share 

[View 3 more comments](#)

 **Inside Scottish Salmon Feedlots** Thanks  and everyone else. It's appreciated.  1

Like · Reply · 2w

   2 ...

Like · Reply · 2w

   replied · 1 Reply

  Done!  1

Like · Reply · 2w





Inside Scottish Salmon Feedlots

23 June at 10:34 · 🌐

SO CLOSE | 8,000 have signed the petition, 2,000 to go.  
 If you've had enough of Norwegian billionaires using Scotland as a sewer, and the Scottish Government doing nothing about it, take two mins to take action against salmon farmers and make Scotland cleaner, healthier and happier, now and for our kids.  
 Sign the petition:<https://you.38degrees.org.uk/.../stop-toxic-salmon-farm-chemi.....> See more



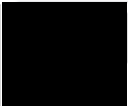

🟢 **Get more likes, comments and shares**  
 When you boost this post, you'll show it to more people.


<b>31,463</b> People reached	<b>4,666</b> Engagements	<a href="#">Boost Post</a>
👍❤️👎 155      24 Comments    216 shares		
👍 Like	💬 Comment	➦ Share

Performance for your post



<b>31,463</b> People Reached		
<b>14,929</b> 3-second video views		
<b>907</b> Reactions, comments & shares		
<b>473</b> Like	<b>149</b> On post	<b>324</b> On shares
<b>15</b> Love	<b>7</b> On post	<b>8</b> On shares
<b>1</b> Haha	<b>0</b> On post	<b>1</b> On shares
<b>3</b> Wow	<b>0</b> On post	<b>3</b> On shares
<b>4</b> Sad	<b>1</b> On post	<b>3</b> On shares
<b>5</b> Angry	<b>1</b> On post	<b>4</b> On shares
<b>190</b> Comments	<b>41</b> On Post	<b>149</b> On Shares
<b>218</b> Shares	<b>216</b> On Post	<b>2</b> On Shares
<b>3,759</b> Post Clicks		
<b>241</b> Clicks to Play	<b>465</b> Link clicks	<b>3,053</b> Other Clicks
<b>NEGATIVE FEEDBACK</b>		
<b>4</b> Hide post	<b>2</b> Hide all posts	
<b>0</b> Report as spam	<b>1</b> Unlike Page	





Reported stats may be delayed from what appears on posts

  25 June at 09:56 · 🌐

Please sign and share -  petition needs to reach 10,000 signatures for the Scottish Government to take notice. We do not want formaldehyde in our lochs and seas. Our seas are not a sewer for fishfarms. Let's smash this.

[Show Attachment](#)

  8 Comments 3 shares

 Like  Comment  Share 

[View 5 more comments](#)

  Done  
[Like · Reply · 4d](#)

 Signed.  
[Like · Reply · 3d](#)

 Thanks everyone!  1  
[Like · Reply · 2d](#)

 [Comment as Inside Scottish Salmon Feedlots](#)    

  24 June at 23:26 · 🌐

[Show Attachment](#)



 Like  Comment  Share 

 [Comment as Inside Scottish Salmon Feedlots](#)    



[Redacted] 24 June at 18:54 · 🌐

Show Attachment

👍 Like    💬 Comment    ➦ Share    🍔

 Comment as Inside Scottish Salmon Feedlots    😊 📷 GIF 🗨️

[Redacted] 24 June at 18:26 · 🌐


Show Attachment

👍 Like    💬 Comment    ➦ Share    🍔

[Redacted] 24 June at 17:07 · 👥

Show Attachment

👍 Like    💬 Comment    ➦ Share

 Write a comment...    😊 📷 GIF 🗨️

[Redacted] 24 June at 15:26 · 🌐

Show Attachment

[Redacted] and 2 others

👍 Like    💬 Comment    ➦ Share    🍔

 Comment as Inside Scottish Salmon Feedlots    😊 📷 GIF 🗨️

[Redacted] 24 June at 07:47 · 🌐

Show Attachment

 [Redacted] 1 Comment

[Redacted] 23 June at 18:57 · 🌐

If you eat farmed salmon, (check the label) you are part of a very destructive intensive farming practise that is destroying areas of open water in Scotland.  
Please help by signing.

Show Attachment

👍 [Redacted]

👍 Like    💬 Comment    ➦ Share    🍔

 Comment as Inside Scottish Salmon Feedlots    😊 📷 GIF 🗨️

[Redacted] 23 June at 18:51 · 🌐

Show Attachment

👍 [Redacted]

👍 Like    💬 Comment    ➦ Share    🍔

 Comment as Inside Scottish Salmon Feedlots    😊 📷 GIF 🗨️

[Redacted] 23 June at 18:38 · 👥

Show Attachment

👍 [Redacted] 2 shares

👍 Like    💬 Comment    ➦ Share

[Redacted] Write a comment...    😊 📷 GIF 🗨️

[Redacted] 23 June at 18:27 · 🌐

Show Attachment

👍 [Redacted] 1 Comment 2 shares

 **Spearfish Scotland** ⋮  
23 June at 17:19 · 🌐

Using formaldehyde on caged fish can not be a good thing. Worth looking in to this campaign especially if you care about where your food is coming from. Maybe sign & share...

[Show Attachment](#)


  and 2 others

---

 Like     Comment     Share    




  ⋮  
23 June at 15:59 · 🌐

[Show Attachment](#)



 9 4 Comments 2 shares

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 Like     Comment     Share    

  If this was beef and antibiotics there would be far more uproar about this. So why can fish and the surrounding environment be polluted with antibiotics. I suppose the £148m export tag on it.  2

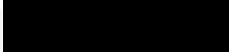
[Like · Reply · 6d](#)

 Signed and shared.  1

[Like · Reply · 6d](#)






 Signed and shared.  1



[Like · Reply · 6d](#)

 Signed

[Like · Reply · 4d](#)



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 Comment as Inside Scottish Salmon Feedlots    






  23 June at 12:35 · 🌐

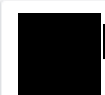

In just over 2 weeks they have gathered 8,000 signatures. They need 10,000 to really make it work. Please take 2 mins to sign the petition and ask others to do so. It is very important. Clean Scottish sea lochs or industrial dumping grounds, it's a simple choice and it affects us all and our children's future.

[Show Attachment](#)


  and 2 others 4 shares




 Like  Comment  Share 

 Comment as Inside Scottish Salmon Feedlots    

  23 June at 12:31 · 🌐



Hi Everyone,





I hope you don't mind me using this page for 

Salmon are sacred to many indigenous people around the world, and indeed, were once sacred to the people who first settled   Sacred meaning they carried a significant mythological function, holding together the bio', psycho', social values of the  ...

[See more](#)

[Show Attachment](#)

  7 Comments 1 share

 Like  Comment  Share 

 **Salmon Free** 23 June at 12:23 · 🌐

Sign here....

[Show Attachment](#)

 Like  Comment  Share 

 **The Seas Rich Harvest** 23 June at 12:11 · 🌐

[Show Attachment](#)

 Like  Comment  Share 

Enclosure 04.2 – Attachment.

**From:** Ask <Ask@sepa.org.uk>

**Sent:** 28 August 2020 14:33

**To:** [REDACTED] gov.scot>

**Cc:** [REDACTED] SEPA.org.uk>; [REDACTED]

[REDACTED] sepa.org.uk>

**Subject:** EXT05-A-F0192278 - Formaldehyde use in freshwater fish farms

Good Afternoon [REDACTED]

As promised, please find SEPA's response to your enquiry regarding Formaldehyde use in freshwater fish farms. This response was drafted and approved by [REDACTED] and [REDACTED]

### **Statement**

Salmon farming companies have been discharging large quantities of formaldehyde into freshwater lochs in the North and West of Scotland, in a largely uncontrolled and unrestricted manner.

### **Response**

Fish farm operators require an authorisation from us before they can use formalin to treat their fish. When granting authorisation, we place strict limits on the quantities that can be used. The limits are set to keep discharges to levels that the receiving rivers and lochs can accommodate without compromising environmental quality standards.

Notes:-

- Formalin (active ingredient, formaldehyde) is used to treat a range of conditions in farmed fish including white spot and bacterial gill disease.
- Discharges to rivers and lochs from fish farms are controlled under the Water Environment (Controlled Activities) (Scotland) Regulations 2011
- Formaldehyde, the active ingredient of formalin, is readily biodegradable with no potential for bioaccumulation in the aquatic environment.
- In Scotland, the environmental standards for the protection of freshwater are 5 micrograms per litre (ug/l) (annual average) of formaldehyde and 50ug/l (maximum allowable concentration).
- Strict discharge limits on the use of products containing formaldehyde (e.g. formalin) are set using river and fresh water loch modelling to identify the environmental capacity of the receiving loch or river.

### **Statement**

The effects of its use in a freshwater ecosystem in the quantities reported are not well researched or understood and many people would expect a more precautionary approach to have been taken and far greater consultation, given the potential for widespread use in a number of lochs and river catchments throughout North and West Scotland.

### **Response**

The environmental standards SEPA applies in to protect freshwaters are based on scientific data on the effects of formaldehyde on freshwater organisms, including species native to Scottish freshwater lochs.

## **Statement**

It is not clear or well understood to what extent formaldehyde on freshwater fish farms will directly impact wild fish, of any species, at the alevin, fry or parr stages or indeed aquatic invertebrates and other foundation organisms that are in proximity to freshwater fish farms. The extent to which its effects may cascade through an entire ecosystem, diminishing biodiversity, is therefore not well understood and the risks are unquantified

## **Response**

The environmental standards SEPA applies to protect freshwaters are based on scientific data on the effects of formaldehyde on freshwater organisms, including species native to Scottish freshwater lochs. The derivation of the standard took account of scientific toxicology data for fish species, including Atlantic salmon and brown trout as well as other freshwater animals.

## **Statement**

It is not clear who the relevant authority is or if the substance is considered a medicine or a biocide for the purposes of regulation.

## **Response**

All discharges to freshwater are regulated by SEPA, including discharges of formaldehyde from freshwater fish farm operations. Formaldehyde is used as a fish medicine and its use as a medicine is regulated by the Veterinary Medicines Directorate.

## **Statement**

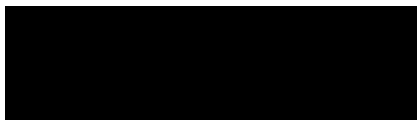
It is not clear under what circumstance operators are required to report use and whether this would capture all usage. There is no public register of use, nor a process for independently auditing the self-reported figures of fish farm operators contained in FOI disclosures.

## **Response**

All farm operators discharging formaldehyde are required to keep details of each occasion of formaldehyde use and to make these records available to SEPA staff for auditing purposes. Currently, not all farms are required to submit reports to us on their formaldehyde use. For farms that are required to submit reports on their formaldehyde use, the information is available on SEPA's public register. In due course, we will be standardising reporting requirements for all farms.

I trust this clarifies SEPA's position and if we can be of further assistance, please do get in touch.

Best wishes



[Ask@sepa.org.uk](mailto:Ask@sepa.org.uk) – dedicated mailbox for enquiries from MPs, MSPs, MEPs, Government Ministers and staff from the Scottish or UK Parliaments

Enclosure 04.3 – Attachment.

Cabinet Secretary for Environment, Climate Change  
and Land Reform

Roseanna Cunningham MSP

T : 0300 244 [REDACTED]

E : scottish.ministers@gov.scot

[REDACTED]@issf.org.uk

Our Reference: 202000077335

Your Reference: Formaldehyde use in freshwater fish farms

03 September 2020

Dear [REDACTED]

Thank you for your letter about your concerns of the use of formaldehyde at freshwater fish farms.

I would seek to assure you that salmon farming companies do not discharge large quantities of formaldehyde into freshwater lochs in the North and West of Scotland, in a largely uncontrolled and unrestricted manner.

My officials inform me that formaldehyde is used as a fish medicine and its use as a medicine is regulated by the Veterinary Medicines Directorate. Formalin (active ingredient, formaldehyde) is used to treat a range of conditions in farmed fish.

All discharges to freshwater are regulated by the Scottish Environment Protection Agency (SEPA) including discharges of formaldehyde from freshwater fish farm operations. Discharges to rivers and lochs from fish farms are controlled under the Water Environment (Controlled Activities) (Scotland) Regulations 2011.

Fish farm operators require an authorisation from SEPA before they can use formalin to treat their fish. When granting authorisation, SEPA places strict limits on the quantities that can be used. The limits are set to keep discharges to levels that the receiving rivers and lochs can accommodate without compromising environmental quality standards. The discharge limits on the use of products containing formaldehyde (e.g. formalin) are set using river and fresh water loch modelling to identify the environmental capacity of the receiving loch or river.

The environmental quality standards for the protection of freshwater used to set the discharge limits for formaldehyde are 5 micrograms per litre ( $\mu\text{g/l}$ ) (annual average) and 50  $\mu\text{g/l}$  (maximum allowable concentration). These environmental standards are based on scientific data on the effects of formaldehyde on freshwater organisms, including species native to Scottish freshwater lochs. The derivation of these environmental standards took account of scientific toxicology data for fish species, including Atlantic salmon and brown trout as well as other freshwater animals. Formaldehyde is readily biodegradable with no potential for bioaccumulation in the aquatic environment.

All farm operators discharging formaldehyde are required to keep details of each occasion of formaldehyde use and to make these records available to SEPA staff for auditing purposes. Currently, not all farms are required to submit reports to SEPA on their formaldehyde use. For farms that are required to submit reports on their formaldehyde use, the information is available on SEPA's public register. In due course, SEPA will be standardising reporting requirements for all farms.

Whilst I have considered and understand the points that you raised in your letter regarding the use of formaldehyde at freshwater fish farms I hope the above information reassures you that there are already effective regulations and controls in place.

Yours sincerely,

**Roseanna Cunningham**

Scottish Ministers, special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See

[www.lobbying.scot](http://www.lobbying.scot)

St Andrew's House, Regent Road, Edinburgh EH1 3DG

[www.gov.scot](http://www.gov.scot)