

CORRESPONDENCE

ANNEX A

Correspondence 1

From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Sent: 01 February 2024 10:22
To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Subject: RE: EIR release - Imports of Salmon eggs

Dear [Redacted R.11(2)],

Could you please release the latest import statistics on Ova like you did below?

Kind regards, [Redacted R.11(2)]

[REDACTED – out of scope of the request]

Correspondence 2

[Redacted R.11(2)] [Redacted R.11(2)]@kverva.no

Our Reference: 202400396759

Dear [Redacted R.11(2)],

Thank you for your correspondence received on 01/02/2024. Your query will be passed to the relevant area for consideration and has been given a reference number of 202400396759. Please quote this number in all correspondence. The Scottish Government aim to respond, where necessary, as quickly as possible and within the stated timescale as indicated on our website (<http://www.gov.scot/Contacts/>).

Yours sincerely

MiCase Correspondence system for SG and partner agencies

Correspondence 3

T : [Redacted R.11(2)]

E : [Redacted R.11(2)]@gov.scot [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no

Our Reference: 202400396759

5 February 2024

Dear [Redacted R.11(2)] ,

Acknowledgement of information request

Thank you for your recent request for ‘information relating to imports of salmon ova’.

As the information you have requested is ‘environmental information’ for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are applying the exemption at section 39 (2) of the Freedom of Information (Scotland) Act 2002 (FOISA), so that we do not also have to deal with your request under FOISA.

This exemption is subject to the ‘public interest test’. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

We received your request on Thursday 1 February 2024 and will respond in accordance with the EIRs by 29 February 2024. However, where possible, we will endeavour to provide information sooner than this. In the meantime, should you have any queries regarding this then please do not hesitate to contact me quoting the reference number: EIR 202400396759.

Yours sincerely

[Redacted R.11(2)] MD-SEDD - Aquaculture and Fish Health

Correspondence 4

To: [Redacted R.11(2)]@kverva.no

Subject: Your recent enquiry with Scottish Government and partner agencies - 202400396759

Date: 23/02/2024 11:17 Please find attached a response to your correspondence.

Correspondence 5

T : [Redacted R.11(2)]

E : [Redacted R.11(2)]@gov.scot [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no

Our Reference: 202400396759

Your Reference: RE: EIR release - Imports of Salmon eggs

23 February 2024

Dear [Redacted R.11(2)] ,

REQUEST UNDER THE ENVIRONMENTAL INFORMATION (SCOTLAND) REGULATIONS 2004 (EIRs)

Thank you for your request dated 1 February 2024 under the Environmental Information (Scotland) Regulations 2004 (EIRs).

Your request

You asked for import statistics relating to salmon ova following on from historical requests and release of information. Your last communication and request dealt with information up until 29 August 2022 (EIR 202200317956)

Response to your request

I enclose a copy of the information you have requested. This includes details of imports of salmon ova between 05/01/2021 to 02/02/2024.

We have re-released some information which was provided to you previously. You may note that there are some slight changes between the information provided to you now in comparison to information provided historically. These changes have been made following a review of the records and information held and reflect the correcting of any errors within that data. At the time of responding to all requests for information, the data released was considered to be accurate and correct.

Your right to request a review

If you are unhappy with this response to your EIRs request, you may ask us to carry out an internal review of the response, by writing to The Director of Marine Scotland Area 1B South, Victoria Quay The Shore Edinburgh EH6 6QQ

Or by emailing Directormarinescotland@gov.scot

Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request. If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner.

More detailed information on your appeal rights is available on the Commissioner's website at: [What can I do if I'm unhappy? | Scottish Information Commissioner \(itspublicknowledge.info\)](https://www.scot.nhs.uk/itspublicknowledge/info)

Yours sincerely

[Redacted R.11(2)] MD-SEDD - Aquaculture and Fish Health

Correspondence 6

From: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>

Sent: 21 March 2025 08:06

Subject: New e-mail address

Dear collaborators and contacts,

Following the recent change where SalMar Aker Ocean will go forward as SalMar Ocean, my e-mail address will be changed to [Redacted R.11(2)]@salmar.no (the old one will be in use for a very limited transition period). Please reach out to me on this new address 😊

[Redacted R.11(2)]

Med vennlig hilsen / Best regards

[Redacted R.11(2)] | Manager Sites & Regulatory, PhD

SalMarOcean AS | Industriveien 51, N-7266 Kverva

M: [Redacted R.11(2)] | @: [Redacted R.11(2)] @salmar.no

Correspondence 7

From: [Redacted R.11(2)]

Sent: 02 August 2024 15:58

To: [Redacted R.11(2)]' [Redacted R.11(2)]@kverva.no>

Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; Malcolm Pentland
<Malcolm.Pentland@gov.scot>

Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Hi [Redacted R.11(2)],

I hope you have enjoyed your summer holidays.

Please find attached copies of the estimated consenting timelines and supporting document for the SAO offshore salmon farm project.

As we discussed previously, these timelines are estimated and based on a best case approach. As this is the first time we are handling an application for [Redacted under regulation 10(5)(e) of the EIRs], work is continuing to clarify the processes for each of the consenting processes. Further detail is provided in the supporting document.

The early pre-application discussion stage [Redacted under regulation 10(5)(e) of the EIRs] will be key in providing further information to both SAO and the regulators on the likely evidence requirements to support the application.

Once you are able to provide details on the locations for the [Redacted under regulation 10(5)(e) of the EIRs] and begin the early pre application discussions, regulators will be able to provide advice on any constraints within the area (such as existing infrastructure, the presence of protected areas etc.), the likely level of environmental survey work required to support an application and whether the [Redacted under regulation 10(5)(e) of the EIRs] would be able to be considered as [Redacted under regulation 10(5)(e) of the EIRs] application or not.

[Redacted - out of scope] however my colleague [Redacted R.11(2)] (copied to this email) will be available to send on location data to the relevant regulators and coordinate meetings as needed.

Best regards

[Redacted R.11(2)]

Aquaculture Policy Manager

Marine Directorate

Scottish Government

e: [Redacted R.11(2)]@gov.scot



From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: Thursday, July 4, 2024 3:37 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; Malcolm Pentland <Malcolm.Pentland@gov.scot>

Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Hi [Redacted R.11(2)]

We should certainly have something ready before you return from summer holidays which we can send over in advance of our next meeting in early August, to inform those next discussions.

I hope you have a good break.

Best regards

[Redacted R.11(2)]

Aquaculture Policy Manager
Marine Directorate
Scottish Government

e: [Redacted R.11(2)]@gov.scot



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of Scotland**



Integrity



Inclusivity



Innovation



Collaboration



Kindness

From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Sent: Thursday, July 4, 2024 3:07 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; Malcolm Pentland
<Malcolm.Pentland@gov.scot>

Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

We are taking our summer holiday tomorrow, so were not going to work further on this before the summer. But if you are in the process of gathering timelines and are able to establish an estimate, it would be very useful for us to get this before you take your holiday so that we are ready for a “flying start” in early August.

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>
Sent: Thursday, July 4, 2024 3:43 PM
To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Cc: [Redacted R.11(2)]@gov.scot; Malcolm.Pentland@gov.scot
Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Hi [Redacted R.11(2)]

Can you remind me when you and your colleagues are beginning your summer break, and we can look to work towards that date to provide the timelines.

Thanks

[Redacted R.11(2)]

Aquaculture Policy Manager

Marine Directorate

Scottish Government

e: [Redacted R.11(2)]@gov.scot



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Integrity



Inclusivity



Innovation



Collaboration



Kindness

From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Sent: Thursday, July 4, 2024 2:33 PM
To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

[Redacted R.11(2)] it is.

Great, then we will await your feedback on the timeline.

As of further progress on coordinates, we are not yet in position to provide coordinates to a specific location. We have worked with [Redacted under regulation 10(5)(e) of the EIRs] on the location that we presented, but we still need to do some more work, [Redacted under regulation 10(5)(e) of the EIRs]

As we are now going into our summer holiday, we suggest that the goal before the summer should be the timeline you are able to provide. And then, after the summer, we will reconnect and start the more thorough work on the locations.

Does this sound like an ok plan to you?

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sent: Thursday, July 4, 2024 11:24 AM

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Good morning [Redacted R.11(2)]

[Redacted R.11(2)]' [Redacted - out of scope]

As Malcolm said we are working with our partners to pull together the timeline and so will get back to you with this in due course.

In reference to a separate action, would you be able to send over the coordinates for the proposed site locations – this will allow colleagues in Crown Estate Scotland to carry out an initial search of the areas for any potential constraints (such as existing infrastructure).

Crown Estate have asked that the coordinates be provided for the full spatial extent of the area needed, including for example anchorage points. Eastings and Northings would be their preferred format for the coordinates to be provided in if possible.

Best regards

[Redacted R.11(2)]

Aquaculture Policy Manager

Marine Directorate

Scottish Government

e: [Redacted R.11(2)]@gov.scot



From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Sent: Thursday, July 4, 2024 8:55 AM

To: Malcolm Pentland <Malcolm.Pentland@gov.scot>

Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Hei Malcolm and [Redacted R.11(2)],

[Redacted - out of scope]

[Redacted - out of scope] We really appreciate that you are making progress on these actions and are looking forward to hearing back from you.

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: Malcolm.Pentland@gov.scot <Malcolm.Pentland@gov.scot>

Sent: Wednesday, July 3, 2024 3:40 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Cc: [Redacted R.11(2)]@gov.scot

Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Dear [Redacted R.11(2)]

It was good to see you again on the call last week.

One of the things we agreed was that [Redacted R.11(2)] would act as a first point of contact for you and SalMar Aker Ocean colleagues. [Redacted – out of scope] [Redacted R.11(2)] [Redacted – out of scope] [Redacted R.11(2)] [Redacted - out of scope] We are putting in place arrangements to progress all the next step actions we discussed and to the same timeframes. In the meantime, can I ask that you use [Redacted R.11(2)] (copied) as your point of contact. In addition, please feel free to be in touch direct with me should you need.

We note the request for timeline and we are making contact with relevant partners to help establish that and will be back in touch.

Best wishes

Malcolm

Malcolm Pentland - Deputy Director, Marine Economy and Communities

Marine Directorate | Scottish Government

Mobile: [Redacted R.11(2)] | Email: malcolm.pentland@gov.scot



From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Sent: Thursday, June 27, 2024 10:15 AM
To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)]@salmarakerocean.no; trine.romuld@salmarakerocean.no; roy.reite@salmarakerocean.no; [Redacted R.11(2)]@salmarakerocean.no; Jim.Gallagher@scottishseafarms.com; Iain Wallace <Iain.Wallace@gov.scot>; Malcolm Pentland <Malcolm.Pentland@gov.scot>; [Redacted R.11(2)]@sepa.org.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@crownstatescotland.com; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Subject: RE: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Dear [Redacted R.11(2)] and all,

First, thank you for taking the time for this meeting – it was a good and constructive start to this process. The notes cover the most important discussions, but we want to clarify one of the points and have a comment on “next steps”.

Regarding the 6th point in the meeting minutes, it is important for us to state clearly that SalMar Aker Ocean needs predictability for a framework for [Redacted under regulation 10(5)(e) of the EIRs], which it seems will trigger [Redacted under regulation 10(5)(e) of the EIRs]. It is not realistic for us to reach a [Redacted under regulation 10(5)(e) of the EIRs] decision with [Redacted under regulation 10(5)(e) of the EIRs] within the framework.

For “next steps”, we think it would be appropriate to include a point, as we understood was agreed upon at the end of the meeting, to establish a timeline that shows the entire process,

with the various sub-processes and dependencies, from the workshop planned in August to the issuance of the permits. Furthermore, the timeline should clearly show the effect of the [Redacted under regulation 10(5)(e) of the EIRs] criteria being triggered. This timeline should be established as soon as possible so that we can start working on the most important workstreams.

We look forward to continued collaboration and appreciate your efforts in this process. Please feel free to reach out if you have any questions or need further clarification.

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sent: Tuesday, June 25, 2024 2:22 PM

To: [Redacted R.11(2)]@salmarakerocean.no; trine.romuld@salmarakerocean.no; roy.reite@salmarakerocean.no; [Redacted R.11(2)]@salmarakerocean.no; Jim.Gallagher@scottishseafarms.com; [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>; Iain.Wallace@gov.scot; Malcolm.Pentland@gov.scot; [Redacted R.11(2)]@sepa.org.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@crownstatescotland.com; [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@gov.scot

Cc: [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@gov.scot

Subject: Ocean Farm Project Meeting One Draft Minutes - Comments by End of Friday 28 June

Dear All

Thank you for your time yesterday. Please find attached a shore note of the meeting. I'd be grateful for any comments/ requested changes by close of play Friday this week (28 June).

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

Correspondence 8

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 11 October 2024 17:55

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Perfect- I'll pick this up with [Redacted R.11(2)] and issue an invite in due course.

Have a good weekend.

Kind regards

[Redacted R.11(2)]

From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Sent: Friday, October 11, 2024 10:07:28 AM

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)],

Thank you!

Yes, it would be very helpful if we can have a meeting with [Redacted R.11(2)]. Our availability the next to weeks are as follows:

In week 42 we are available at the following times (all Oslo time):

- From 13:00 Monday 14th
- From 13:00 on Wednesday 16th
- The whole of Friday 18th

In week 43 we are available at the following times (all Oslo time):

- From 13:00 Monday 21st
- Before 11:00 Thursday 24th
- The whole of Friday 25th

If you think it is better to arrange with [Redacted R.11(2)] directly, we are happy to do that.

When we have determined the timing of the meeting, we will provide the main questions from our side.

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sent: Thursday, October 10, 2024 11:11 AM

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)]

Just to follow up on this. I spoke to [Redacted R.11(2)] yesterday ([Redacted R.11(2)]@hient.co.uk) who is happy to discuss the procurement or development of [Redacted under regulation 10(5)(e) of the EIRs] with you. Highlands and Islands Enterprise may be able to provide you with some support to do so. I understand that [Redacted R.11(2)] has had a very initial discussion with [Redacted R.11(2)] on this matter too. [Redacted R.11(2)] [Redacted under regulation 10(5)(e) of the EIRs].

Are you happy to pick up a discussion with [Redacted R.11(2)]?

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

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From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Sent: Tuesday, October 8, 2024 3:55 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)],

Sounds like the call with HIE will get us an overview and some answers. Lets hope for that. In the meantime, great with this case study in [Redacted under regulation 10(5)(e) of the EIRs] – and really appreciate that you follow up this quickly and give us these updates.

It was also fortunate that you sent this today as we discussed some follow-up questions in the meeting with the leadership in SAO today. Maybe you can take this further to HIE. The two questions below is still valid, but some nuances had been very good to shed some light on:

[Redacted under regulation 10(5)(e) of the EIRs]

In sum, what we are after is the timelines for the [Redacted under regulation 10(5)(e) of the EIRs], both [Redacted under regulation 10(5)(e) of the EIRs], and how the access to [Redacted under regulation 10(5)(e) of the EIRs] will affect the process.

Let me know if some of this was unclear.

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sent: Tuesday, October 8, 2024 12:13 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)]

I've got a call scheduled with HIE tomorrow who will be better placed to advise. HIE is currently providing support to a number of [Redacted under regulation 10(5)(e) of the EIRs] projects in Scotland and will have a better overview of the process from start to finish.

If it helps in the interim, [Redacted under regulation 10(5)(e) of the EIRs]

So that is just over a year within the consenting system from initial EIA screening activities to submitting and deciding the application. It is the timeline preceding these events which I need to seek advice on – [Redacted under regulation 10(5)(e) of the EIRs], evidence gathering all of which leading to a successful application. Obviously this will be variable between companies,

however HIE may be best placed to give the overall estimate given their hand in a number of projects in Scotland.

I will come back to you asap and hope this is helpful for today.

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

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From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Sent: Friday, October 4, 2024 3:34 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)],

As there is a meeting in the SAO group leadership in Tuesday next week, I was just wondering if it is possible to get an estimate of the timeline of such a project within Tuesday at 12? A rough estimate would suffice.

If it is still in process, that is totally understandable, and not a problem at all.

Sincerely, [Redacted R.11(2)]

Sendt fra Outlook for iOS

Fra: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Sendt: Wednesday, October 2, 2024 8:15:02 AM
Til: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>
Emne: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)],

We have the same saying in Norway – and in my experience, it often proves to be right 😊 So totally understandable, and of course ok by us.

[Redacted under regulation 10(5)(e) of the EIRs] is what we are assessing now. We may also assess the possibilities of [Redacted under regulation 10(5)(e) of the EIRs], but this is out of scope for now. Regarding #2, sound very good – really appreciate the collaborative spirit and quick feedback!

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]



From: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>
Sent: Tuesday, October 1, 2024 3:05 PM
To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)]

[Redacted - out of scope] I hope you are ok liaising with [Redacted R.11(2)] on the 3 – 12nm consenting meeting arrangements. I thought it best not to cut across on my return and as [Redacted R.11(2)] works within my team. There is a saying in English ‘ too many cooks spoil the broth’. I’m not sure if it translates to Norwegian – essentially too many people contributing and commenting can lead to poorer results.

On your first question, I will pull some information together for you. But in large part the process [Redacted under regulation 10(5)(e) of the EIRs] consents. I will look to see if I can find [Redacted under regulation 10(5)(e) of the EIRs]

On your second question, I think the below queries are something which Highlands and Islands Enterprise could help you with. Could I have an initial discussion with [Redacted R.11(2)] and come back to you on that also? I know she is liaising with you separately on Ocean Farm. Any discussion would be on the basis of commercial confidentiality and I would not share your email on.

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

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From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Sent: Tuesday, October 1, 2024 12:42 PM

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

Hi [Redacted R.11(2)],

[Redacted - out of scope]

I'm reaching out regarding another [Redacted under regulation 10(5)(e) of the EIRs] we have at SalMar Aker Ocean, which is separate from the regulatory "fast-track," but still important for the [Redacted under regulation 10(5)(e) of the EIRs]. This concerns the [Redacted under regulation 10(5)(e) of the EIRs]

In this regard, I'm wondering if someone could assist with the following questions:

[Redacted under regulation 10(5)(e) of the EIRs]

I hope it's all right that I'm contacting you directly, as we're in the [Redacted under regulation 10(5)(e) of the EIRs].

I hope you can assist with this, and I look forward to hearing from you.

Best regards, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]

Mobile: [Redacted R.11(2)]



Kverva AS

Ferjemannsveien 10

7042 Trondheim, Norway

Correspondence 9

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 25 November 2024 11:54

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Subject: RE: Short talk about my role in SalMar Aker Ocean going forward

Dear [Redacted R.11(2)]

Thank you for reaching out. I fully agree that we've built a positive working relationship and it would be great to discuss the changes. You'll have received my out of office – [Redacted – out of scope] – I have returned now and could be available at the following times this week (UK time):

- Tuesday 26th anytime between 13:00 and 18:00
- Wednesday 27th between 11:00 and 13:00 or 16:00 – 18:00
- Thursday 28th between 10:00 and 11:00

Are any of these suitable?

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

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[Marine Directorate](#) | [Marine Directorate Blog](#) | [@ScotGovMarine](#) | [Marine Directorate LinkedIn](#)

From: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>
Sent: Monday, November 18, 2024 8:30 AM
To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Subject: Short talk about my role in SalMar Aker Ocean going forward

Dear [Redacted R.11(2)],

The constructive process between SalMar Aker Ocean and the Scottish Government is progressing nicely, and we have gotten far since our first meeting in Trondheim during Aqua-Nor in the fall of 2023. As we are now going into a phase where there will need to be close communication between SalMar Aker Ocean and the Scottish Government in order to start digging into details, my role will change going forward.

Can we have a 15-20 minutes meeting at your convenience so that I can explain why this change, and how I will be involved going forward? It is not dramatic, it has been the plan the whole time, but I would like to do it orally as I have been part of the process since the beginning, and I believe we've had very good communication this far.

I'm available today between 12pm and 2pm CET, all Wednesday and Friday except 12pm to 2pm CET.

Sincerely, [Redacted R.11(2)]

Med vennlig hilsen / Kind regards [Redacted R.11(2)]

Mobile: [Redacted R.11(2)]



Kverva AS

Ferjemannsveien 10

7042 Trondheim, Norway

Correspondence 10

From: [Redacted R.11(2)] [Redacted R.11(2)]@salmarakerocean.no>

Sent: 06 December 2024 10:21

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@SEPA.org.uk; [Redacted R.11(2)]@nature.scot; [Redacted R.11(2)]@crownstatescotland.com; [Redacted R.11(2)] [Redacted R.11(2)]@salmarakerocean.no>; [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Cc: Malcolm Pentland <Malcolm.Pentland@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: SV: Meeting Actions 4 December 2024 RE: Project meeting between SAO and regulatory/advisory bodies

Good morning,

First of all, SAO would like to echo [Redacted R.11(2)] and thank you all both for your time and useful guidance and feedback during the meeting. Many thanks also to SG for organising this larger group meeting and to you [Redacted R.11(2)] for swiftly sending out the actions. SAO has nothing to add and expect to provide [Redacted under regulation 10(5)(e) of the EIRs].

Kind regards,

[Redacted R.11(2)]

[Redacted R.11(2)] | **Manager Sites & Regulatory, PhD**

SalMar Aker Ocean AS | Industriveien 51, N-7266 Kverva

M: [Redacted R.11(2)] |@: [Redacted R.11(2)]@salmarakerocean.no

The logo for SalMarAkerOcean, featuring the company name in white text on a dark blue rectangular background.

Tenk på miljøet før du skriver ut denne meldingen. Denne meldingen er bare ment for mottakeren og kan inneholde fortrolige opplysninger eller annen privat informasjon. Hvis du mottar denne ved en feil, vær så vennlig å melde fra til avsenderen og slett originalen. All annen bruk av innholdet i e-posten er forbudt.

Fra: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sendt: torsdag 5. desember 2024 15:57

Til: [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@SEPA.org.uk; [Redacted R.11(2)]@nature.scot; [Redacted R.11(2)]@crownestatescotland.com; [Redacted R.11(2)] [Redacted R.11(2)]@salmarakerocean.no>; [Redacted R.11(2)] [Redacted R.11(2)]@salmarakerocean.no>; [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Kopi: Malcolm.Pentland@gov.scot; [Redacted R.11(2)]@gov.scot; [Redacted R.11(2)]@gov.scot

Emne: Meeting Actions 4 December 2024 RE: Project meeting between SAO and regulatory/advisory bodies

Hi All

Thanks again for your time yesterday. Please note a copy of the actions captured below.

Let us know if anything is missing. Otherwise, we will take those actions forward as agreed.

Please note I've included two points which were raised in side discussions after the meeting, which are useful to capture.

Meeting actions

- SEPA will continue to consider the application of organic standards and new depomod
 - Developer to share updated coordinates and [Redacted under regulation 10(5)(e) of the EIRs]
 - Crown Estate Scotland to commence informal proximity checks and regulators to consider our advice regarding the subsequent timing of the 'formal' pre-application stage (linked to action below)
 - SG/ Regulators/ Landlord will update the timetable with Crown Estate Scotland Lease milestones and, in turn, review any adjustments associated with other consenting milestones. New time table to be shared to all by end of year. Short TEAMS call to be arranged in January to agree our collective understanding of the timetable and application sequencing.
 - SG to establish contact with HSE and set up an introductory meeting.
 - Developer to provide clarity on lead/ applications relating to Ocean Farm.
 - SG to review [Redacted under regulation 10(5)(e) of the EIRs]
 - SG to send EIA information on by close of play 6 December.
-
- SG/Regulators to confirm representatives that wish to visit Ocean farm, with the intention of organising a fact finding visit during Summer 2025
 - SG to share Code of Good Practice for Scottish Finfish Aquaculture with developer

Captured post meeting

- During the review of the timetable, it would be useful to discuss structure and sequencing of community engagement (paying close attention to when/ where development details would be expected to become public knowledge)
- Useful to provide more detail on supporting information on the Crown Estate Scotland lease (include business plan information)

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

Correspondence 11

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 24 March 2025 14:36

To: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>

Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: RE: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

Good afternoon [Redacted R.11(2)],

We are unable to provide you with details of the requester as it falls under personal information which cannot be released.

Just to update you we have reviewed the redactions for the meeting minutes and have decided that some aspects of the information previously identified will not be redacted as the information is in the public domain – namely that SalMar Ocean have an interest in developing a farm of the east coast of Shetland as businesses representatives are quoted in a recent media story as saying:

“The entire eastern side of Shetland is considered prosperous for exposed aquaculture, i.e. further offshore than traditional aquaculture”.

“We have a good dialogue with the relevant authorities, and we are in early phase of community engagement.”

We will redact the specifics on [Redacted under regulation 10(5)(e) of the EIRs] proposed and on the more specific area of interest first identified by SAO [Redacted under regulation 10(5)(e) of the EIRs] as well as the reference to [Redacted under regulation 10(5)(e) of the EIRs] as previously discussed.. For reference I have attached a copy of the relevant document with the sections to be redacted highlighted.

I shall notify you when the information has been released.

Best regards

[Redacted R.11(2)]

Aquaculture Consenting Delivery Lead

Marine Economy and Communities - Marine Directorate

Scottish Government

e: [Redacted R.11(2)]@gov.scot



From: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>
Sent: 24 March 2025 08:40
To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>
Subject: SV: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

Good morning [Redacted R.11(2)],

Many thanks and also in advance for notifying us. I have read up on the information on your web pages related to EIR, but it is unclear to me if we will also be informed/notified on who has requested this information?

[Redacted R.11(2)]

Med vennlig hilsen / Best regards

[Redacted R.11(2)] | **Manager Sites & Regulatory, PhD**

SalMarOcean AS | Industriveien 51, N-7266 Kverva

M: [Redacted R.11(2)] | @: [Redacted R.11(2)]@salmar.no

Fra: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>
Sendt: fredag 21. mars 2025 10:48
Til: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>
Kopi: [Redacted R.11(2)]@gov.scot
Emne: RE: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

Good morning [Redacted R.11(2)],

Many thanks for the quick response to our initial email seeking Salmar Ocean's views on release of certain aspects of email communications between Scottish Government and Salmar Aker Ocean.

As my colleague [Redacted R.11(2)] explained in her initial email to you on this matter, we will take account of your views in regards to the release of certain pieces of information held in the relevant correspondence.

We will consider SalMar Oceans' views alongside the public interest in disclosure and whether this is not outweighed by the public interest in upholding the exception regarding the reference to certain information held in the correspondence.

I shall notify you when the EIR case is complete and information is released.

Best regards

[Redacted R.11(2)]

Aquaculture Policy Manager

Marine Directorate

Scottish Government

e: [Redacted R.11(2)]@gov.scot



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From: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>

Sent: 20 March 2025 14:56

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Cc: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: SV: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

Both,

I have now feedback and confirmation that disclosure of the following information [Redacted under regulation 10(5)(e) of the EIRs] of the Ocean Farm 2 project at that time" is likely to cause

substantial harm to a legitimate commercial interest, since this has not been communicated in public or explicitly and we do not want this to come into hand of any competitors or other stakeholders. In addition, SalMar, as the owner of SalMar Ocean, is a company noted on the Oslo stock exchange and such information is considered to be sensitive to this. There are no other pieces of information that we would ask not to be disclosed.

[Redacted R.11(2)]

Med vennlig hilsen / Best regards

[Redacted R.11(2)] | **Manager Sites & Regulatory, PhD**

SalMarOcean AS | Industriveien 51, N-7266 Kverva

M: [Redacted R.11(2)] | @: [Redacted R.11(2)]@salmar.no

Fra: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>

Sendt: torsdag 20. mars 2025 15:06

Til: [Redacted R.11(2)]@gov.scot

Kopi: [Redacted R.11(2)]@gov.scot

Emne: SV: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

[Redacted R.11(2)],

That is noted – we will revert with our final response to both you and [Redacted R.11(2)].

[Redacted R.11(2)]

Med vennlig hilsen / Best regards

[Redacted R.11(2)] | **Manager Sites & Regulatory, PhD**

SalMarOcean AS | Industriveien 51, N-7266 Kverva

M: [Redacted R.11(2)] | @: [Redacted R.11(2)]@salmarakerocean.no

Fra: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sendt: torsdag 20. mars 2025 14:05

Til: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>

Kopi: [Redacted R.11(2)]@gov.scot

Emne: RE: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

Hi [Redacted R.11(2)],

Thanks for the prompt response. We await your further response by EOB tomorrow.

[Redacted - out of scope] I would appreciate it if you could send the response to [Redacted R.11(2)] (cc'd), who will be taking over the handling of the information request.

Kind regards

[Redacted R.11(2)]

From: [Redacted R.11(2)] [Redacted R.11(2)]@salmar.no>

Sent: 20 March 2025 11:46

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Subject: SV: URGENT - Scottish Government Third Party Consultation - request for information under the Environmental Information (Scotland) Regulations 2004 (EIRs)

Good day [Redacted R.11(2)],

Many thanks for reaching out to us with information both about the request and information you intend to release – this is highly appreciated and the courtesy of it acknowledged.

My immediate response would be that disclosure of the following information [Redacted under regulation 10(5)(e) of the EIRs] of the Ocean Farm 2 project at that time” is likely to cause substantial harm to a legitimate commercial interest, since this has not been communicated in public or explicitly and we do not want this to come into hand of any competitors or other stakeholders. However, I will need to run this up the line internally in SalMar Ocean, but I have highlighted the urgency of this request and expect to revert to you at latest EOB tomorrow.

[Redacted R.11(2)]

Med vennlig hilsen / Best regards

[Redacted R.11(2)] | **Manager Sites & Regulatory, PhD**

SalMarOcean AS | Industriveien 51, N-7266 Kverva

M: [Redacted R.11(2)] | @: [Redacted R.11(2)]@salmarakerocean.no

Fra: [Redacted R.11(2)]@gov.scot [Redacted R.11(2)]@gov.scot>

Sendt: onsdag 19. mars 2025 19:20

Til: [Redacted R.11(2)] [Redacted R.11(2)]@salmarakerocean.no>

Emne: URGENT - Scottish Government Third Party Consultation - request for information under the

Environmental Information (Scotland) Regulations 2004 (EIRs)

Viktighet: Høy

Good afternoon,

The Scottish Government has received a request under the Environmental Information (Scotland) Regulations 2004 (EIRs) for *“all email correspondence between your domain (“@gov.scot”) and the domain “@salmarakerocean.no” between January 1st 2024 and the date at which you process this request, inclusive.”*

You have an interest in the information which has been requested because within the Ocean Farm Project meeting minutes from 24 June 2024, included in the release is information pertaining [Redacted under regulation 10(5)(e) of the EIRs] of the Ocean Farm 2 project at that time. Therefore, I am writing to ask you for your views on whether disclosure of this information will cause, or be likely to cause substantial harm to a legitimate commercial interest, before we make a decision on our response.

Please note that this consultation is a courtesy, not a statutory obligation, and you do not have a veto on disclosure of the information. Under the terms of the EIRs, the decision on whether or not to release the information is for the Scottish Government alone. However, we will take account of your views.

I should also explain that we can withhold information only if an exception under the EIRs applies to that information and the public interest in disclosure is not outweighed by the public interest in upholding the exception. You can find detailed information about the EIRs on our website at: <https://www.gov.scot/publications/guide-to-information/> or on the Scottish Information Commissioner’s website at: <https://www.foi.scot/>

In order to ensure that we meet our statutory duty to respond to the request within 20 working days of receiving it, I must ask for your views by **21 March 2025**.

As a courtesy, I have also included a copy of the information which we intend to release on or before **03 April 2025**.

Kind regards

[Redacted R.11(2)]

[Redacted R.11(2)] (pronouns she/her)

Aquaculture Policy Manager, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

E: [Redacted R.11(2)]@gov.scot

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[Redacted - out of scope]



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Correspondence 12

From: [Redacted R.11(2)]

Sent: 28 March 2024 15:26

To: [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>

Subject: FW: Marine Fund Scotland Launch 2024/25

Dear [Redacted R.11(2)]

Further to my email this morning, please see the below communication about the Marine Fund Scotland. The first round for 2024/2025 is now open (with first round applications open until 9 May 2024).

Marine and fisheries grants - gov.scot (www.gov.scot)

Kind regards

[Redacted R.11(2)]

Head of Aquaculture Development, Marine Economy and Communities, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

T: [Redacted R.11(2)]

M: [Redacted R.11(2)]

E: [Redacted R.11(2)]@gov.scot

[REDACTED – out of scope]

Meetings and Agendas

Meeting 1

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 14 October 2024 14:59

To: [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]

Cc: [Redacted R.11(2)]

Subject: [Redacted under regulation 10(5)(e) of the EIRs]

When: 16 October 2024 12:30-13:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

Sensitivity: Private

Hi Both

Setting up a short call to discuss/ explore [Redacted under regulation 10(5)(e) of the EIRs] in Scotland following [Redacted R.11(2)]'s initial questions.

[[Redacted R.11(2)] – [Redacted R.11(2)] also has availability between 12:00 – 15:30 Oslo time on Friday 25th October, however we thought we could have this initial discussion this week to under stand the line of thought/ ask]

Kind regards

Meeting 2

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 04 October 2024 15:58

To: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>; [Redacted R.11(2)] [Redacted R.11(2)]@sepa.org.uk [Redacted R.11(2)]@SEPA.org.uk>; [Redacted R.11(2)] [Redacted R.11(2)]@kverva.no>; [Redacted R.11(2)] [Redacted R.11(2)]@salmarakerocean.no>

Subject: Meeting with SalMar Aker Ocean

When: 28 October 2024 10:00-14:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Edinburgh - Victoria Quay 1st Floor Meeting Room 1 B North 2 (12)

Update with new Teams link to allow [Redacted R.11(2)] remote access:

Attached agenda

Meeting between SEPA, MD-LOT and SalMar Aker Ocean

Date and Location

Monday 28th October (10:00 – 14:00)

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

Attendees

[Redacted R.11(2)] – Specialist I, Scottish Environment Protection Agency (SEPA)

[Redacted R.11(2)] – Marine Licensing Group Leader, Scottish Government

[Redacted R.11(2)] – Head of Environmental Quality Unit, Scottish Government

[Redacted R.11(2)] – Head of Aquaculture Development, Scottish Government

[Redacted R.11(2)] – Aquaculture Policy Manager, Scottish Government

[Redacted R.11(2)] - Site Developer, Salmar Aker Ocean

[Redacted R.11(2)] (Remote) – Investment Manager, Kverva

Agenda

- Introductions **(5 minutes)**
- SalMar presentation on offshore project **(30 minutes)**
- SG Policy - Consenting and regulation of fish farm discharges (differences between 0-3NM and 3-12NM) **(15 minutes)**
- SEPA – Assessment and regulation of potential fish farm discharges **(45 minutes)**
- MD-LOT – Assessment and consenting of fish farm equipment **(30 minutes)**
- Lunch **(30 minutes)**
- Discussion on offshore salmon farm operations **(30 minutes)**
- SG Policy – Proposed pre-application process **(30 minutes)**
- Next steps **(15 minutes)**
- Any other business

Meeting 3

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 15 November 2024 10:19

To: [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)]@shetland.gov.uk; [Redacted R.11(2)] [Redacted R.11(2)]@sepa.org.uk; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]; [Redacted R.11(2)]

Cc: Malcolm Pentland; [Redacted R.11(2)]; [Redacted R.11(2)]

Subject: Project meeting between SAO and regulatory/advisory bodies

When: 04 December 2024 13:00-16:00 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Hybrid (In person - Victoria Quay Edinburgh)

UPDATE: Agenda included

This will be a hybrid meeting held in Scottish Government's Victoria Quay offices, with those unable to attend in person able to dial in via the Teams link below.

Agenda

- Introductions
- SAO update on revised area of interest
- Review of initial meetings with regulators and initial feedback on identified area of interest
- Formal pre-application process discussion
- Crown Estate Scotland seabed leasing
- Consenting timeline
- Next steps

Meeting 4

Catch up

From: [Redacted R.11(2)] [Redacted R.11(2)]@gov.scot>

Sent: 25 November 2024 21:27

To: [Redacted R.11(2)]

Subject: catch up

When: 03 December 2024 11:00-11:20 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: Microsoft Teams Meeting

Meeting One Minutes: Ocean Farm Project

24 June 2024, 10:00 – 11:30 by TEAMS

Attendees

Salmar Aker Ocean

- Roy Reite, CEO
- Trinie Romuld, CFO, COO
- [Redacted R.11(2)], Investment Project Manager (also Kverva)
- [Redacted R.11(2)], Development Director
- [Redacted R.11(2)], Oceanographer

Scottish Sea Farms

- Jim Gallagher, MD

Scottish Environment Protection Agency

- [Redacted R.11(2)], Aquaculture Specialist

Crown Estate Scotland

- [Redacted R.11(2)], Head of Aquaculture

Shetland Islands Council

- [Redacted R.11(2)], Coastal Zone Manager

Scottish Government

- Malcolm Pentland, DD Marine Economy and Communities
- Iain Wallace, DD Operations
- [Redacted R.11(2)], Streamlining Section Lead MD Licensing Operations Team
- [Redacted R.11(2)], Head of Fish Health Inspectorate
- [Redacted R.11(2)], Aquaculture Policy Officer
- [Redacted R.11(2)], Senior Aquaculture Delivery Lead

Agenda

- Welcome Introductions
- Overview of Development Proposals
- Overview of required consents
 - Crown Estate Scotland Leasing
 - Shetland Islands Council (Planning Permission)
 - Designating marine zones 3 – 12 nm
 - Marine Directorate Licensing Operations Team (Marine Licence)
 - Fish Health Inspectorate (Aquaculture Production Authorisation)

- Ways of working and next steps

Minutes

1. Malcolm Pentland welcomed attendees, made introductions and provided context for the meeting.
2. Roy Reite and the Salmar Aker Ocean (SAO) team presented on proposals for [Redacted under regulation 10(5)(e) of the EIRs] Ocean Farm 2 [Redacted under regulation 10(5)(e) of the EIRs] off the East Coast of Shetland [Redacted under regulation 10(5)(e) of the EIRs] as part of a long term investment programme. The presentation included stocking and specification information. [Redacted R.11(2)] confirmed the consenting system can support different stocking densities where evidence is provided and monitoring requirements can be agreed. Smolt supply was discussed.
3. Whilst SAO's investment decisions are yet to be made, the working timetable would require consent determinations by [Redacted under regulation 10(5)(e) of the EIRs]. SAO stressed the importance they place on having a level of predictability in relation to consenting when considering Capex investment of the scale involved with such developments SAO asked how they could get early feedback on area constraints and advice on the necessary steps for pre application and application activities across the consents and the timescales involved.
4. Each of the lease and consent bodies presented on the permissions required: Crown Estate Scotland lease, Planning Permission, Marine Licence and Aquaculture Production Business Authorisation. Regulators committed to working together to communicate and coordinate requirements. Processes being trialled under the Shetland and Highland consenting pilots (0 – 3nm) could provide a base to work from.
5. Scottish Government outlined its intention to identify the marine planning zones from 3 – 12nm via secondary legislation, expected to come into force by Spring 2025 and to address a regulatory gap.

6. Further discussion is required on whether SAO's development proposals will be classed as major development (developments > 2ha), triggering statutory pre-application processes in planning. This is unlikely where SAO progresses individual applications for Ocean Farm 2. If major development is triggered, formal pre application activities could not commence until Spring 2025, however a processing agreement could be developed to support the major application (this sets out timescales and responsibilities).

7. There is some work to do on marine licencing processes. Scottish Government Marine Directorate will work with the Scottish Environment Protection Agency (SEPA) to consider this. SEPA identified that the change in operational space may ask different questions of its 0 – 3nm regulatory framework and asked for an early discussion with SAO if they considered any elements of the environment regime would be challenging (mixing zones were specifically referenced).

8. Crown Estate Scotland requires some assurance about the final consent requirements before proceeding to a lease options agreement, however initial constraints checks could be completed.

Next Steps

9. Attendees agreed the next steps:
 - [Redacted R.11(2)] will act as coordinating contact point for the Scottish Government, its public bodies and partners. [Redacted R.11(2)] will act as the contact point for SAO.
 - Early constraints checks by Crown Estate Scotland will commence – SAO will provide the coordinates for the proposed developments.
 - Regulators will consider how to coordinate early pre application advice on constraints and potential 'showstoppers' (building on [Redacted R.11(2)] offer to informally commence pre application proceedings).
 - Scottish Government will consider the marine licencing process.

- A working group will be formed, which will work to set out the combined consent requirements, the milestones and responsibilities.
- The next meeting will take place early to mid-August.

ESTIMATED CONSENTING TIMELINES FOR SALMON FARM DEVELOPMENT (3-12NM)

This paper is intended to explain some of the stages shown in the Consenting Timelines profiled in the accompanying excel spreadsheet.

The current timetables are an estimate. Work is continuing to clarify the processes for each of the consents when applied to a proposed farm located beyond 3nm, as this is the first time such a development will be assessed under the existing consenting regimes

The early pre-application discussions stage will also provide further detail which may impact on the estimated length for the different consenting processes, and the timetables can then be updated as required.

Timetables are provided for applications that are considered either local development or major development in regards to the planning process, as there are some differences between the two.

Sheet 1 - Consenting Timetable (Local Development – area less than 20,000 m²)

Crown Estate Scotland (CES) Lease

Constraints check

CES will be able to undertake a constraints check for the proposed area of development. This will identify whether there is any other infrastructure (including subsea infrastructure such as pipelines and cables) or existing lease option agreements within the proposed area. SalMar Aker Ocean (SAO) will need to provide coordinates for the proposed area of development for the constraints check to be carried out

Sea Bed Area Agreement

You may wish to seek an appropriate sea bed area agreement with CES, before you proceed to the planning and licensing stages.

The agreement would set out the areas of the seabed that SAO intend to seek to develop fish farms, and include a range of conditions that would be required to be met in order for a lease to be granted.

Lease Agreement

This represents the final step in the consenting process. Once the relevant permissions are in place the sea bed lease may be granted.

Planning Permission and Marine Licence

Planning permission and the marine licence are two separate consents, however it is intended that the application process for both will run simultaneously (as far as possible) to streamline the consenting process.

The planning application will be administered by Shetland Islands Council (SIC) planning authority.

The marine licence will be administered by Marine Directorate Licensing Operations Team (MD-LOT). The marine licence covers the deposit of equipment and the deposit of farm discharges (organic waste and medicinal residues).

Assessment and regulation of farm discharges for sites located within 0-3nm is regulated by the Scottish Environmental Protection Agency (SEPA). SEPA will therefore support MD-LOT in assessing the farm discharges aspect of the marine licence process and may act as the primary contact in the pre-application stages. Work is continuing to clarify the processes for this.

Early pre-application discussions

It is recommended that early pre-application discussions take place with the relevant regulators; SIC Planning Authority, SEPA and MD-LOT, as well as NatureScot and Fish Health Inspectorate (consultees to the planning process).

These discussions will allow SAO to provide further details on the proposed location and on the structure of the farms, and allow regulators to provide further detail on the application process and will encourage SAO to submit details on the pre-application template.

Regulators may also be able to provide initial advice on the evidence likely to be required to support the application, such as results of environmental survey work of the proposed location – depending on the level of survey work required this may impact on the estimated timetables.

Pre-application

It is intended that the pre-application stage should be carried out in line with the new process currently being piloted in Scotland. This pilot process has been designed to align the Local Planning and SEPA pre-application processes for farms in the 0-3nm zone, removing duplication and streamlining the process.

As previously noted, MD-LOT will be responsible for assessing and regulating farm discharges for farms in the 3-12nm zone instead of SEPA, however it is intended that SEPA will support this process, including through the pre-application phase, as they have the expertise in this area.

A full description of the pilot pre-application process can be viewed at the following webpage [Aquaculture - Consenting Task Group: draft consenting pilot process - gov.scot \(www.gov.scot\)](http://www.gov.scot/resources/documents/2016/06/160622_Aquaculture_-_Consenting_Task_Group_-_draft_consenting_pilot_process_-_gov.scot), alongside [flowcharts](#) outlining each of the pre-application phases

Submission of Application

Following the publication of the pre-application scoping/screening opinion you should be in a position to complete and submit your planning application and marine licence application for determination. It is estimated it will take a minimum of 4 months to determine the outcome of the applications.

Marine Licence application forms and guidance - [Marine licensing: applications and guidance - gov.scot \(www.gov.scot\)](#)

SIC planning applications and guidance - [Marine Fish Farm Planning Application and Guidance – Shetland Islands Council](#)

Aquaculture Production Business (APB) Authorisation

APB authorisation is administered by the Marine Directorate Fish Health Inspectorate (FHI)

Early application discussions

It is recommended that early pre-application discussions take place with the FHI to provide further advice on the application process, including the type of information they will expect to be included in the application.

FHI will also be able to advise on information they would expect to be included in the planning application process, including information relevant to intended stocking densities.

APB application

You should submit your APB application no later than 2 months after you have submitted your planning application as the processing time for APBs can take up to 90 days.

The application forms and guidance can be found at the following webpage [Aquaculture Production Business \(APB\): forms and guidance - gov.scot \(www.gov.scot\)](#)

In addition the application should be accompanied by a copy of the farm biosecurity plan and veterinary health plan.

Sheet 2 - Consenting Timetable (Major Development – area greater than 20,000 m²)

A major development will broadly follow the same timetable as that of a local development, with the exception that there is a requirement for a statutory pre-application phase as part of the planning permission process.

The statutory pre-application phase may only begin once, legislation is in place to extend local planning authority jurisdiction out to 12nm. We anticipate that this legislation will enter into force by April 2025.

Pre-application consultation (often known as PAC) is a statutory requirement, which must be undertaken prior to submission of any planning application, for developments that are categorised as being either 'major' or 'national' developments. The aim of the process is to improve the planning system by strengthening the involvement of communities, at an early stage and to better reflect local views on proposed developments of national and major significance.

It is the developer's responsibility to undertake PAC. The key stages of the PAC process are:

- Determining whether PAC is required;
- Giving a proposal of application notice (PoAN) to the planning authority;
- Publishing newspaper notices in advance of public events;
- Carrying out statutory consultation activity:
 - Holding a minimum of two physical public events regarding the proposal
 - Consulting relevant community councils;
- Carrying out any additional consultation activity beyond the statutory minimum as required by the planning authority in its response to the PoAN (which it is required to do within 21 days of the PoAN being given);
- Making the planning application to the planning authority no earlier than 12 weeks from when the PoAN was given to the planning authority, and no later than 18 months from the giving of the PoAN; and
- Submitting a PAC report alongside the application for planning permission.