

Enclosure 14 – Email from Salmon Scotland to the Scottish Government

From: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** Director of Environment & Forestry
Sent: Monday, November 27, 2023 9:54 AM
To: Tavish Scott <tavish@salmonscotland.co.uk>; Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Tavish

Apologies for the ongoing delay in sending you a substantive response on this. I am pleased to let you know that NatureScot has recently confirmed the withdrawal of their objection to SEPA's CAR licence authorisation, based on an agreement that has been reached for an adaptive management approach to the operation of the site. The understanding of my team is that Mowi, NatureScot and SEPA are all content that this situation has therefore been resolved. If that is not your understanding of their position, please do let me know.

Kevin

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Thursday, November 23, 2023 8:51 AM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Morning [REDACTED – Regulation 11(2)],

Is there any update on this as a further month has passed?

Many thanks
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



www.salmonscotland.co.uk

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From: [REDACTED – Regulation 11(2)]@gov.scot <[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** director.enfor@gov.scot
Sent: Thursday, October 12, 2023 2:34 PM
To: Tavish Scott <tavish@salmonscotland.co.uk>; director.enfor@gov.scot
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Tavish

Appreciate you are keen to receive a substantive response. Unfortunately, I can't give a more precise timescale, but we will make sure it as soon as possible.

[REDACTED – Regulation 11(2)]

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Thursday, October 12, 2023 10:49 AM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Good morning [REDACTED – Regulation 11(2)],

Thank you. I have been on the end of “in due course” many times. Given I raised this on 1st September, could you give some indication of when we will receive a substantive reply?

Many thanks indeed.

Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
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From: [REDACTED – Regulation 11(2)]@gov.scot <[REDACTED – Regulation 11(2)]@gov.scot> **On Behalf Of** director.enfor@gov.scot
Sent: Thursday, October 12, 2023 10:30 AM
To: Tavish Scott <tavish@salmonscotland.co.uk>; director.enfor@gov.scot
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Tavish

Sorry we haven't responded as yet. I can confirm Dave has been reassured that the issue is being actively looked into. He will revert in due course once we have additional information.

[REDACTED – Regulation 11(2)]

Environment and Forestry Directorate

From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Wednesday, October 11, 2023 1:29 PM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: RE: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Hi Kevin,
I wonder if you are in a position to advise on this matter.
Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



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From: Tavish Scott <tavish@salmonscotland.co.uk>
Sent: Friday, September 1, 2023 11:43 AM
To: Director of Environment & Forestry <director.enfor@gov.scot>
Cc: [REDACTED – Regulation 11(2)]<[REDACTED – Regulation 11(2)]@mowi.com>
Subject: ISLE OF BARRA FISH FARM- Call-in to Scottish Ministers by Naturescot

Fyi – shared with sponsor hub

Good morning Kevin,

Naturescot – pending Ministerial decision re Isle of Barra fish farm.

I understand from Mowi Scotland that your Cab Sec will receive Scottish Government legal advice accompanying a submission from Naturescot in the coming days regarding their objection to a SEPA CAR license for this fish farm. I am very concerned that Naturescot have not engaged with Mowi Scotland and have chosen to confine their observations to Ministers to an interpretation of environmental grounds rather than recognising the holistic position that covers socio-economic importance of this commercial business to Barra.

I would therefore be grateful if you could look into this matter and ensure Ministers are properly aware of all the factors that pertain to this and in particular the failure of Naturescot to engage, which I find very concerning. Professor Russel Griggs independent report into aquaculture regulation published in February 2022 recommended measures to halt this kind of practice from government agencies. His recommendations were of course accepted by the Cabinet Secretary for Rural Affairs.

Background –

Mowi Scotland are presently investing in our Hellisay fish farm on Barra with new pen equipment proposed and are in the process of securing the necessary regulatory permissions.

The current development comprises of twelve pens of 120 m circumference. The proposed modified development will replace the existing pens with five pens of 200 m circumference. The location of the pens will be broadly in the same position as the existing development. The existing feed barge will be retained and will remain in a similar position, located to the west of the pens. There will be no increase in the current consented maximum standing biomass of 2,150 tonnes. The site will continue to be serviced from Ardveenish, with no change in the operational vessel transit route proposed or other operational processes.

SEPA had advised they were content with the development and proposed to issue the requisite environmental permission (the CAR Permit).

NatureScot however raised an objection to this on environmental grounds (contrary to the SEPA assessment) and requested Scottish Ministers call-in the application for their own determination. The parallel planning application is now suspended pending the decision of Scottish Ministers with NatureScot refusing to engage with us until a determination on the call-in request is reached.

Should the development fail to secure the necessary permissions there is a risk that the existing farm will cease to operate. Consequently, in the event of this likelihood there are likely to be significant adverse socio-economic impacts to the Barra economy including a loss of a combined total of 22.5 FTE jobs across the community. We feel it is appropriate and relevant to bring this to the attention of the Cabinet Secretary, thus the email below. However Mowi understand that this socio-economic information is now not going to be considered in this determination.

Mowi and Salmon Scotland remain disappointed with the approach of NatureScot. Over the 10-year operational life of the fish farm Mowi have a wealth of monitoring information demonstrating there have been no significant effects on the surrounding environment. Mowi interactions with NatureScot through this process have been characterised by delayed correspondence timeline with NatureScot and an unwillingness to engage, which has ultimately led to the call-in request. Given Mowi had received a draft CAR license prior to this, any concerns raised over issuing of the CAR Permit could have been mitigated through proactive engagement with the company. However regrettably this has not been possible.

I hope this information is useful and [REDACTED – Regulation 11(2)], Mowi Scotland's [REDACTED – Regulation 11(2)] and I would be happy to discuss this further with you. I am sure you will appreciate our concern should the decision be to refuse the SEPA CAR licence.

Best wishes
Tavish

Tavish Scott
Chief Executive

M [REDACTED – Regulation 11(2)]
E tavish@salmonscotland.co.uk



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