

Dear Rural Affairs and Islands Committee

This is a follow up to my message to you on 1 February. I apologise for not giving you everything in one neat package, but I have only just received the response to an EIR request which provides an excellent specific illustration of the more general points I was making a week ago.

On 8 September 2025, I made a complaint to APHA about conditions at MOWI's Leven Farm (also confusingly sometimes referred to as Callert or even 'South of Manager's House'). This was due to considerable mortalities over a period of several months. The causes were various, including sealice treatments and physical damage. FHI reports had mentioned that these fish were due for transfer to a site further north, called Ardessie. Ardessie itself was known to have problems with jelly fish and raised mortalities.

The complaint was 'passed to the FHI for their consideration'. FHI commented that I was mixing 'two publicly available sets of data: Salmon Scotland monthly mortality website and Fish Health Inspectorate's' which 'cannot be compared directly'. It's a pity they can't.

APHA communicated extensively with FHI and with MOWI.

Rightly or wrongly – and I do not dispute that here – a heavily redacted EIR response showed that it was concluded that **'a site visit from APHA is not required.'**

Matters did not improve. On 4 December 2025, I reported the site to APHA again. Mortalities continued to be high. At this time, the figures for October had just been published and those for September were also high. A new cause of mortality, 'Transportation' was cited. Death due to Transportation suggested to me poor welfare which ought to be investigated.

Additionally, there were confusing discrepancies between information given by FHI and Salmon Scotland as to whether the sites at Leven and Ardessie were 'In Production' or 'Fallow'.

So three factors had made me report the site again:

- An extended period of continuing high mortalities.
- A new cause of death – Transportation
- Confusing information as to where the fish actually were.

The risk level was elevated from Low to Medium, but no new investigation appears to have been carried out at all. No correspondence is shown or cited.

The sum total of the investigation states as follows:

'The informant has already complained about this site for the same period. There is no substantial change in the information provided and therefore the previous risk assessment of no inspection will apply again.'

APHA seem to have disregarded all the new information. They never carried out any inspection, remote or in person. All they ever did was look at the same data that I had used to report the site and ask questions of two bodies (FHI and MOWI) who would have been very pleased for no action to be taken. The second complaint seems to have produced no action at all.

As a matter of interest and to give a sense of scale to the problems at Leven, these were large broodstock salmon, averaging 13kg per fish. In one week in early July, 1904 fish (24.7 tonnes). By the first week in September there were 1197 deaths (15.6 tonnes). In a fortnight spanning the end of September and early October there were 1678 deaths (21.8 tonnes). Over the whole period of the last six months of 2025, the total would have been many times these figures. Hundreds of tonnes.

I have no confidence that the rigorous systems to protect fish welfare about which the Scottish Government are so keen to reassure us are anything other than completely dysfunctional.

One has sympathy for the farm workers who have to deal with these problems day in and day out, but it is hard to find any respect for those who claim that this is an acceptable part of sustainable salmon farming. Likewise for APHA's failure to deal adequately with detail or fish welfare. I wonder if the Scottish Government is paying a fee for this inadequate DEFRA performance.

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