

Our Ref: [Redacted]
Your Ref:

Mowi Scotland Limited
Farms Office
Glen Nevis Business Estate
Fort William
PH33 6RX

If emailing, mark FAO:
[Redacted]

7 February 2023

Sent by email to: environment@mowi.com

Dear [Redacted]

**WATER ENVIRONMENT AND WATER SERVICES (SCOTLAND) ACT 2003
THE WATER ENVIRONMENT (CONTROLLED ACTIVITIES) (SCOTLAND) REGULATIONS 2011
(AS AMENDED)
LOCATION: LINNHE (ARDGOUR) MPFF, LOCH LINNHE
PERMIT REFERENCE: CAR/L/1009970
SUBJECT: ASSESSMENT OF COMPLIANCE WITH PERMIT CONDITIONS**

I am writing with reference to the inspection of the Linnhe (Ardgour) MPFF site on 24 January 2023 to assess compliance against the conditions of the above permit.

The following non compliances with respect to the conditions of the permit were identified by the inspection:

Condition	Non-compliance	Action	Timescale for action
2.3.1	The minimum period of 42 consecutive days between every production cycle was not achieved. The fallow period was just 15 days.	Provide an explanation as to why the minimum fallow period was not undertaken between the Q4 21 generation production cycle and Q4 22 generation production cycle.	28 February 2023
2.3.2	Notification was not received of the site being stocked on 07/11/2022.	Provide an explanation as to why notifications were not sent when the site was fallowed and restocked.	
2.3.3	Notification was not received of the site being fallowed on 23/10/2022.		

3.5.1	The emamectin treatment started on 16 December 2022 was administered to the fish in pens 4 and 5 over just 6 days. Each pen should receive the treatment over a minimum of 7 days.	Provide an explanation as to why the fish in pens 4 and 5 were not fed over 7 days as the licence condition and prescription.	
3.5.2	The total amount of emamectin benzoate used in a treatment started on the 16 December 2022 exceeded an amount equivalent to treating the fish at a rate of 60 micrograms per kilogram of fish per day over a 7-day period.	Provide an explanation as to why there was an exceedance of the dose rate when it was apparent the anticipated biomass would not be reached.	
3.6.2	Notification of an in-feed treatment was received less than 7 days before the treatment. Notification was received on 13 December 2022 of the emamectin benzoate treatment that started on 16 December 2022. Each notification received did not contain all the information required by Table 5 of the permit.	Provide an explanation as to why 7 days' notice was not given. There was no explanation in the notification to suggest this was an emergency treatment. In future, all required information should be provided in the notification as specified in the permit.	
5.2.1	Biological sampling was not undertaken during the production cycle that started in September 2021.	In reference to the email provided by Mowi on the 03/02/2023 in relation to the proposed biomass increase at Linnhe, please provide an explanation as to why monitoring was not undertaken for the last production cycle as required by the current version of the permit.	
5.4.2	Notification was not received as soon as practicable or at least 48 hours before that the monitoring would not be carried out in accordance with the specified requirements.	An update notification should be provided in future if the monitoring is not carried out.	

7.2.1	Part of the information required to be submitted to SEPA on a quarterly basis has not been reported.	This has been raised before but has not been implemented at Linnhe. Data returns should be resubmitted and contain all the information required.	
7.2.3	The report containing the steps taken to minimise the use of medicines was not submitted.	Provide an explanation as to why the report has not been submitted following end of the Q4 21 generation production cycle.	

Whilst the non-compliances detailed above were identified, compliance with a number of other conditions was demonstrated during the inspection. Information on these can be found in the accompanying inspection report.

It is important that you address the non-compliances detailed in this letter. You must ensure that the issues raised above are dealt with in accordance with the relevant timescale where indicated and confirm to SEPA in writing when this has been done.

Failure to fully address the non-compliances may result in SEPA taking further action in accordance with our enforcement policy and guidance which can be found at <https://www.sepa.org.uk/regulations/enforcement/>

Although SEPA continues to assess compliance with permit conditions, we have ceased to apply our Compliance Assessment Scheme (CAS). The last year for which site level compliance was provided under this scheme was 2019. Consequently, the permit non-compliance covered by this correspondence has not been rated in accordance with the CAS manual and you have not been provided with a CAS summary for the site.

If you disagree with the non-compliances set out above, or have any questions about this letter, please contact me, telephone [Redacted] or email [Redacted]@sepa.org.uk.

Yours faithfully

Redacted

Enc: Linnhe MPFF Inspection Report

Cc: manager.linnhe@mowi.com