

FAO **REDACTED**
Mowr Scotland Limited
1st Floor Admiralty Park
Admiralty Road
Rosyth
Fife
KY11 2YW

Our Ref: **REDACTED**
Your Ref: **REDACTED**

If emailing, mark FAO:
REDACTED

19 December 2025

Dear **REDACTED**

Final Warning Letter: FWL/2025-9114

The Water Environment (Controlled Activities) Scotland) Regulations 2011 (as amended)

The Environmental Authorisation (Scotland) Regulations 2018 (as amended)

Location: Ardgour (Linnhe) Marine Pen Fish Farm

Permit Reference: CAR/L/1009970

Subject: Failure To Undertake Chemical Sampling

I write in response to your letter dated the 20 November 2025 explaining that monitoring to assess compliance with the emamectin benzoate standard has not been undertaken at the Ardgour site during the production cycle that ran from the 06 December 2023 to 07 March 2025.

As no chemical monitoring has been carried out, the non-compliance raised in our letter dated the 4 November 2024 is no longer applicable and has been removed. Instead, the following major non-compliance now stands.



Chair
Lisa Tennant

CEO
Nicole Paterson

Angus Smith Building
SEPA
Unit 6, 4 Parklands Avenue
Holytown
Motherwell
ML1 4WQ

Tel: 03000 99 66 99
www.sepa.org.uk

Condition	Non-compliance	Major non-compliance
5.3.1	Self-monitoring to assess compliance with the emamectin benzoate seabed standard following the last treatment on 22 August 2024 has not been undertaken.	Yes

In reference to the reasons presented by Mowi as to why the monitoring was not carried out as required, the onus is on Mowi to ensure that the appropriate processes are in place to comply with the conditions of the permit. The requirement to undertake chemical monitoring is an established part of using emamectin benzoate and it is worrying that the necessary processes to track treatments and plan monitoring are not always effective. While it is acknowledged that you propose to refine internal systems to ensure monitoring is not missed in the future not just at Ardgour but at all sites operated by Mowi, evidence will need to be provided of these changes. You have 3 months from the date of this letter to provide this evidence, either through a demonstration or through documentation. Furthermore, you should seek to demonstrate compliance with the above condition as soon as possible, by undertaking monitoring as required and submitting the results to SEPA.

The failure to undertake chemical monitoring and to contravene a condition of the permit is considered an offence under Regulation 44(1)(d) of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended). SEPA have considered the circumstances as to why monitoring was not carried out, the lack of communication with SEPA at the time, Mowi's previous history regarding undertaking monitoring and the actions proposed by Mowi to improve compliance. The use of emamectin benzoate is permitted on the basis that operators monitor as per the conditions of the permit to demonstrate that a site is meeting the required environmental standards. A failure to monitor undermines our ability to make an appropriate assessment and take action if necessary. We have therefore decided that the most appropriate level of enforcement action in this instance is to issue a **final warning** letter.

Any further/continued contravention of the above legislation is likely to result in enforcement action being taken against you by SEPA. While such enforcement action could, for example, include the submission of a report to the Procurator Fiscal recommending prosecution, SEPA may equally consider suspending the use of emamectin benzoate until such time as a survey is provided in the appropriate window that demonstrates compliance.

If you have any questions about this letter, please contact Redacted s by email at Redacted @sepa.org.uk or telephone on REDACTED

Yours sincerely

REDACTED

cc. environment@mowi.com via email