



[REDACTED]

Our ref: FOI2025/24996

[REDACTED]

18 December 2025

Dear [REDACTED]

REQUEST FOR INFORMATION: Loch Duart's Outer Bay visit reports

Thank you for your request for information of 20th November about Loch Duart's Outer Bay visit reports. APHA have handled your request under the Freedom of Information Act 2000 (FOIA).

Your information request and our response are set out below.

“Please could I have any reports from visits that you have carried out at Outer Bay between May and October 2025?”

Please see a copy of the report at Appendix 1. Some of the information is being withheld under Section 40 – Personal Information. Please see further details below.

Section 40 – Personal Information

The information is being withheld under section 40(2), read in conjunction with 40(3A)(a), (third party personal data), of the FOIA as the information constitutes data relating to a third party. Section 40(2), read in conjunction with 40(3A)(a), of the FOIA provides that personal data relating to third parties is exempt information if disclosure of that information would breach any of the data protection principles in Article 5(1) of the General Data Protection Regulation (GDPR). APHA considers that disclosure of this information is likely to breach the first data protection principle in Article 5(1)(a) repeated in 35(1) DPA, which provides that personal data must be processed lawfully, fairly, and in a transparent manner in two ways. First, disclosure would not constitute 'fair' processing of personal data, second, disclosure of that information would not be 'lawful'. As such the owners would hold a APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy reasonable expectation that their details are for APHA's use only and not disclosed to third parties. Under section 40 of the FOIA the term "personal data" means any

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

information relating to an identified or identifiable living individual. "Identifiable living individual" means a living individual who can be identified, directly or indirectly. APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy. APHA have concluded that this information is exempt from disclosure under section 40 of the FOIA. Information disclosed in response to this FOI request is releasable to the public. In keeping with the spirit and effect of the FOIA and the government's Transparency Agenda, this letter and the information disclosed to you may be placed on [GOV.UK](https://www.gov.uk), together with any related information that will provide a key to its wider context. No information identifying you will be placed on the GOV.UK website.

An Annex is attached which explains the copyright that applies to the information being released to you and contact details should you be unhappy with the service you have received.

If you have any queries about this letter, please contact the Access to Information Team at the email address below or postal address at the top of this letter.

Yours sincerely

Access to Information Team

enquiries@apha.gov.uk

Annex

Copyright

The information supplied to you continues to be protected by copyright. You are free to use it for your own purposes, including for private study and non-commercial research, and for any other purpose authorised by an exception in current copyright law.

Documents (except photographs or logos) can also be used in the UK without requiring permission for the purposes of news reporting. Any other re-use, for example commercial publication, would require the permission of the copyright holder.

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Copyright in other documents may rest with a third party. For information about obtaining permission from a third party see the [Intellectual Property Office's website](#).

Complaints

If you are unhappy with the service you have received in relation to your request, you may make a complaint or appeal against our decision under section 17(7) of the FOIA within 40 working days of the date of this letter. Please write to the Access to Information Team at the address at the top of this letter or email enquiries@apha.gov.uk and the team will arrange for an internal review of your case.

If you are not content with the outcome of the internal review, section 50 of the FOIA gives you the right to apply directly to the Information Commissioner's Office (ICO) for a decision. Please note that generally the ICO cannot make a decision unless you have first exhausted APHA's own complaints procedure.

The ICO can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Please click [here](#) for further contact details.



APHA WIL reference

[CAD Vet log](#) (if applicable)

Welfare Incident Record and Veterinary Risk Assessment

Information provided

To be completed in all cases by the person taking the call / email

Report taken by: Report type: Complaint
 Date: Referral
 Time call / email received : Origin: Select Origin

For use by CAD/Duty Vet where a suspicion of notifiable disease is being reported by a member of public or if during the course of the call the CAD/Duty vet suspects notifiable disease.

If notifiable disease suspicion is reported by a PVS or from the premises occupier an EXD40 **must** be completed and VENDU informed.

- Is notifiable disease suspected? (by CAD vet/or public) No
- What notifiable disease is suspected? N/A
- Duty / RTG vet and VENDU informed of possibility of ND? N/A

Third party reference

Previously reported (Yes / No)

Previous APHA reference (incl. FSA referrals):

Nature of complaint and information provided:

- Number of animals, species, breed,
- premises type
- whether welfare needs being met (feed, water, shelter, bedding etc),
- whether or not animal suffering has been witnessed (injury, distress, etc),
- duration of incident and other relevant information.

(Paste emails containing photos etc. here)

Email sent to the DV mailbox:

*“Dear APHA,
 I am concerned about the level of salmon mortalities at the Loch Duart Outer Bay site, and the potential for fish escape.
 Mortalities have risen above 2% regularly since 2022 - which is an awful lot of dead fish - but this month have risen to over 11%, which is horrific.
 If they are unable to control predation in this area, maybe they shouldn't be allowed to farm fish here? Being constantly under attack must be*

Welfare Category:

Farm
 Market
 Slaughter
 Transport

[OS Map Ref. or w3w location](#) determined from the informant:

subjecting the salmon to terrible levels of stress, and there is a risk of salmon escaping from seal damage to infrastructure.
Kind regards,
[REDACTED]

Reported location of animal(s):

(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Loch Duart (outer Bay)

APHA Delivery Team for this location:

[Scotland - Inverness](#)

If the complainant is aware this issue has been reported to other organisations, please record details here:

[REDACTED]

Note: Informant details are only used by inspectors to gather further information or to clarify location details

Informant name (do not add full name if informant wishes to remain anonymous):

[REDACTED]

Telephone number 1:

[REDACTED]

Telephone number 2:

[REDACTED]

Email:

[REDACTED]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):

[REDACTED]

Likely CPH: [REDACTED]

Telephone number 1: [REDACTED]

Telephone number 2: [REDACTED]

(Scotland & Wales only) [Active XC claimant?](#) (Yes / No) [REDACTED]

(S & W only) SBI/CRN/BRN [REDACTED]

(S & W only) On [current XC selection?](#) (Yes / No) [REDACTED]

Last Sam welfare inspection date (N/A if not applicable): [REDACTED]

Ongoing [Complex case?](#) (Yes / No) [REDACTED]

Sensitive case? (Yes / No) [REDACTED]

Listed on [Hazard Database?](#) (Yes / No) [REDACTED]

Comments and recommended local actions based on available information:

- Consider number of animals, breed, age, environmental conditions etc.
- Include risks and mitigating factors in a reasoned assessment of whether animal needs were/are now being met and if animal suffering was/now is occurring.
- Refer to the Guidance for Completing the Welfare Incident Record and Veterinary Risk Assessment Form ([WF114](#))

Low risk as the information provided is from 2022, before closing as negligible or insufficient information Health Inspectorate was contacted by email for an updated with recent data about the mortality on site or other issues.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day <input type="checkbox"/>	2A - Medium Within seven calendar days <input type="checkbox"/>	3 - Low Within 14 calendar days <input checked="" type="checkbox"/>
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours <input type="checkbox"/>	2B - Medium (FSA/FSS) Within seven calendar days <input type="checkbox"/>	4 - Negligible No inspection <input type="checkbox"/>
1C - High Urgent, within 24 hours <input type="checkbox"/>	2C - High/Medium (FSA/FSS) <input type="checkbox"/>	5 - Insufficient information No inspection <input type="checkbox"/>

(For categories 4 & 5 local assessment must also be completed, the form emailed to [REDACTED]@apha.gov.uk and a note made on Sam if applicable.)

Date inspection required by (N/A if not applicable):

Veterinarian completing VRA:

Uploaded to FARM (England only) (Yes / No)

VRA Date:

VRA Time:

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)

Amended owner/keeper name and address (include postcode):

Amended CPH:

Telephone number 1:

Telephone number 2:

(S & W only) [Active XC claimant?](#) (Yes / No)

(S & W only) SBI/CRN/BRN from [CSC database:](#)

(S & W only) On [current XC selection?](#) (Yes / No)

Last Sam welfare inspection date (N/A if not applicable):

[REDACTED]
Loch Duart Ltd [REDACTED]
Outer Bay
Loch Droighniche

Ongoing [Complex case?](#)
(Yes / No)

Sensitive case? (Yes / No)

Listed on [Hazard Database?](#) (Yes / No)

For Complex cases in:

• **England:**

- following second visit, Field to complete and VAFD to countersign the Complex Case Referral Form - England (WF169(E))
- following third visit, Referral Form (WF169(E)) to be countersigned by Welfare VA
- all Referral Form (WF169(E)) versions needs to be emailed prior to visits to @apha.gov.uk and @apha.gov.uk

- **Scotland and Wales**, please follow specific Complex Case Referral Form - Scotland (WF169(S)) and Complex Case Referral Form - Wales (WF169(W)) instructions respectively

Local knowledge and further information:

- include risks and/or mitigating factors not recorded above to be considered in the assessment of whether animal needs were/are now being met and if animal suffering was/now is occurring
- refer to the Guidance for Completing the Welfare Incident Record and Veterinary Risk Assessment Form (WF114).

Contacted Loch Duart Salmon and spoke to , who followed up with an email:

“As discussed, the site in question is experiencing elevated mortality due to seal predation. I have attached the corresponding recent MD FHI inspection report (visit 30/04/25).

I can confirm that the site is fitted with weighted HDPE pen nets (new in Autumn '24), subsurface secondary netting (lead-lined, fully enclosed box; new Autumn '24), and top nets (full overlap with & stitching to pen nets). There is a seal presence on site around the pens most days. Attacks on fish are through the layers of netting; seals are not entering the pens.

Harvests have now begun on site to reduce overall fish number & the selected fish are due to transfer into our freshwater site in September.”

Some broodstock salmon are suffering as a result of seal predation, but all possible mitigating measures have been taken to prevent this by Loch Duart Salmon Ltd, as these fish are particularly valuable.. No measures are allowed to scare the seals, and they are biting the fish through double nets. Any injured fish are promptly culled, and the population is being reduced as is possible. This is a brood stock site, and so pens are lower stocked already, and numbers in the pens are low so the high % mortality does not relate to a lot of fish (92-279 per week of mortalities). No further action by APHA at this time.

Outcome of discussion with Local Authority (LA) about this case:

FHI report from visit on 30/04/2025 shows compliant visit with no concerns for the health and welfare of the salmon. FHI provided mortality data from 17/04/25 to 11/07/25 on 15/07/2025. The high mortalities started in March up to present time with a maximum of 3.67% and have been attributed to seal predation. No further visits are planned currently for this site.

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

1A - High Immediate, same day <input type="checkbox"/>	2A - Medium Within seven calendar days <input type="checkbox"/>	3 - Low Within 14 calendar days <input type="checkbox"/>
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1B - High (FSA/FSS) Urgent, within 24 hours <input type="checkbox"/>	2B - Medium (FSA/FSS) Within seven calendar days <input type="checkbox"/>	4 - Negligible No inspection <input checked="" type="checkbox"/>
1C - High Urgent, within 24 hours <input type="checkbox"/>	2C - High/Medium (FSA/FSS) Delayed for up to eight weeks <input type="checkbox"/>	5 - Insufficient information No inspection <input type="checkbox"/>

Justification if Local Assessment inspection requirement differs from the VRA inspection requirement:

Some small numbers of broodstock salmon are suffering as a result of seal predation, but any injured fish are culled as soon as possible to limit the time of suffering. All possible mitigating steps have been taken to prevent this, with depopulation happening as soon as is possible. Because these are broodstock salmon in sea cages, early harvest is not a possibility, and the fish need to be taken back into freshwater tanks on land. The seals are not getting into the pens but biting the fish through double nets (HDPE pen and predator nets). Depopulation will allow the fish to escape the seals easier and should reduce injuries to the fish, those subsequently culled, and the number killed directly by the seals.

Date inspection required by (N/A if not applicable):

n/a

England and Wales - Organisation(s) attending:

APHA only LA only APHA and LA N/A

Scotland - Name of organisation(s) attending (N/A if not applicable):

N/a

Name of APHA representative attending (N/A if not applicable):

n/a

Role (N/A if not applicable):

n/a

Veterinarian completing Local Assessment:

Staff number:

Local Assessment date:

16/07/2025

Local Assessment time:

15:00

Email completed Welfare Incident Record and Veterinary Risk Assessment Form (WF77) to:

England:

- [REDACTED]@apha.gov.uk

Scotland:

- [REDACTED]@apha.gov.uk
- [REDACTED]@apha.gov.uk

Wales:

- [REDACTED]@apha.gov.uk
- [REDACTED]@apha.gov.uk
- [REDACTED]@apha.gov.uk
- Current Welfare Subject Principles and Deputies

APHA is an Executive Agency of the Department for Environment, Food and Rural Affairs and also works on behalf of the Scottish Government, Welsh Government and Food Standards Agency to safeguard animal and plant health for the benefit of people, the environment and the economy.

HM3 Stamp	Name:		Date Received:		WS ID:	
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