Animal & Plant Health Agency

Animal and Plant Health Agency
Access to Information Team
Woodham Lane
New Haw
Addlestone
Surrey
KT15 3NB

enquiries@apha.gov.uk

www.gov.uk/apha

[REDACTED]
[REDACTED]

Our ref: IR2026/14645
13 Aug 2026

Dear [REDACTED]

INTERNAL REVIEW: Fish Farm Welfare Inspection Reports 2025-2026

Thank you for your email which APHA received on 2 July appealing against our response to your request for information. Your original request was dealt with under Environmental Information Regulations 2004 (EIRs). Your request for an internal review has been handled under the same legislation.

The Internal Review Request

“Request for Internal Review

I am writing to formally request an internal review of the Animal and Plant Health Agency’s (APHA) response dated 24 June 2026 to my request for information under the Environmental Information Regulations 2004 (EIRs), reference EIR2026/09309.

My request was for:

1. Copies of all Fish Farm Welfare Inspection Reports conducted at Scottish salmon farms from 1 January 2025 to the date of the request (27 April 2026).
2. Copies of all Welfare Incident Records and Veterinary Risk Assessments relating to Scottish salmon farms over the same period.

APHA refused to disclose the Welfare Incident Records and Veterinary Risk Assessments, citing the exception in Regulation 12(4)(e) (Internal Communications).

I challenge this decision on the following grounds:

1. Inconsistency with Established Precedent of Prior Disclosures

The APHA has a clear, established practice of disclosing these exact documents (specifically Form WF77: "Welfare Incident Record and Veterinary Risk Assessment ") in response to recent FOI and EIR requests. Examples of identical forms disclosed by APHA include:

- IR2026/03800 (Appendix 2: Loch Leven, complaint date 08-09-2025)
- EIR2026/00587 (Appendix 4: Loch Leven, complaint date 04-12-2025)

- FOI2025/11218 (Appendix 9: Ardmair, complaint date 04-03-2025)
- FOI2025/18007 (North Shore Appendix 1, complaint date 07-07-2025)

These disclosures prove that WF77 forms are not subject to a blanket exemption under Regulation 12(4)(e). In these prior cases, the public interest test was resolved in favor of disclosure (subject only to standard redactions of personal details), demonstrating that disclosure does not adversely affect APHA's operations or the free and frank exchange of views.

2. Incorrect Application of Regulation 12(4)(e)

Regulation 12(4)(e) is a qualified exception. APHA argues that these documents constitute internal communications containing advice, analysis, and preliminary views. However, Form WF77 consists primarily of factual information, including:

- Details of the farm and complaints received.
- Factual mortality rates and sea lice counts.
- Objective veterinary observations and final regulatory decisions/actions.

Factual, administrative, and final decision-making records do not attract the protection of the internal communications exception. Furthermore, because these cases are concluded, there is no ongoing deliberative process that would be disrupted by disclosure.

3. Public Interest Test

There is an overwhelming public interest in transparency regarding the welfare of farmed fish in Scotland, particularly given rising mortality rates and high-profile incidents. The public interest in understanding how APHA responds to complaints and enforces welfare regulations far outweighs the agency's interest in maintaining a "safe space " for finalized assessments.

4. Omission of Loch Harport Inspection (27 May 2025)

In APHA's response to FOI2025/20674 (which provided a list of aquaculture site visits in Appendix 01), it is recorded that an inspection was conducted at Mowi Scotland Ltd – Loch Harport on 27 May 2025.

However, no inspection report for this site visit was supplied in the list of inspection reports (Appendices 01–18) for EIR2026/09309, despite falling squarely within the timeframe of my request.

- If a WF152 Welfare Inspection Report was generated for this inspection, please explain why it was omitted from the disclosure.

- If the inspection was documented only via a WF77 form and associated case files, then the omission of this major inspection illustrates how the blanket withholding of WF77 forms results in the complete concealment of significant regulatory actions."

APHA originally withheld certain information under Regulation 12(4)(e) of the Environmental Information Regulations 2004 (EIRs).

Discussion and Investigation

A request was received for an internal review to be carried out on the release of Fish Farm Welfare Inspection Reports 2025 – 2026 on 27 April 2026 (EIR2026/09309). An internal review is a reconsideration of the original response and seeks to determine whether the information requested has been correctly identified and whether the Environmental Information Regulations 2004 (EIRs) have been correctly applied.

As part of the review, APHA considered the concerns raised regarding the omission of information relating to inspection activity at Mowi Scotland Ltd, Loch Harport, on 27 May 2025.

The review established that no WF152 Fish Farm Welfare Inspection Report was created in relation to this case. The matter was instead addressed through a video meeting between APHA and the operator, following which a warning letter was issued. The case was recorded by way of a WF77 Welfare Incident Record and Veterinary Risk Assessment.

Having reviewed the information held in relation to this case, APHA has determined that the warning letter (Appendix 1) and the associated WF77 Welfare Incident Record and Veterinary Risk Assessment (Appendix 2) can be disclosed. APHA considers that disclosure of these documents promotes transparency and accountability in relation to its regulatory role in safeguarding animal welfare.

Furthermore, upon reviewing the application of Regulation 12(4)(e) and the concerns raised regarding consistency of application, APHA conducted an additional necessary and proportionate search. APHA also considered the examples of previous disclosures referenced in the request for internal review, including the disclosures of WF77 Welfare Incident Records and Veterinary Risk Assessments made in response to earlier information requests. Having reviewed those disclosures alongside the circumstances of this request, APHA concluded that a further assessment of the application of Regulation 12(4)(e) was required. As a result, further Welfare Incident Records and Veterinary Risk Assessments falling within the scope of the original request were identified. In the interests of openness and transparency, these documents are being disclosed as Appendices 3 to 38.

The information requested has been reviewed and disclosed where held. Certain information has been redacted because it constitutes personal data relating to third parties. In accordance with Regulation 12(3) of the Environmental Information Regulations 2004 (EIR), personal data must be considered under Regulation 13.

APHA has applied Regulation 13(1) and 13(2A) of the EIR because disclosure of the redacted information would contravene the first data protection principle set out in Article 5(1)(a) UK GDPR, which requires personal data to be processed lawfully, fairly and transparently.

The redacted information comprises personal data relating to individuals associated with the inspected premises, legal representatives and APHA staff. These individuals would not reasonably expect their personal information to be disclosed to the public through an EIR request. APHA therefore considers that disclosure would be unfair and unlawful.

As the information is exempt under Regulation 13(1), this is an absolute exception, and no public interest test applies.

Certain information has been withheld under Regulation 12(5)(f) of the Environmental Information Regulations 2004. The withheld information was provided by individuals who reported animal welfare concerns voluntarily and who would have had a reasonable expectation that their identity and information capable of identifying them would be treated confidentially. Disclosure could discourage members of the public from reporting animal welfare concerns in the future and would adversely affect the interests of those individuals and APHA's ability to obtain similar information voluntarily in the future.

APHA has considered the public interest in disclosure and recognises the importance of transparency in regulatory decision-making. However, in this case, the public interest in maintaining the confidentiality of individuals who report welfare concerns and ensuring the continued flow of information necessary for effective enforcement and animal welfare protection, outweighs the public interest in disclosure.

Internal Review Decision

Following completion of the internal review, APHA has concluded that the original response did not identify all Welfare Incident Records and Veterinary Risk Assessments falling in scope of the request. As a result, additional information has been identified through the review and is now being disclosed.

Having reconsidered the application of Regulation 12(4)(e), APHA has concluded that, in this case, the public interest in maintaining the exception does not outweigh the public interest in disclosure. The identified WF77 records are therefore being disclosed.

The review has established that no WF152 Fish Farm Welfare Inspection Report was generated for the activity undertaken at Mowi Scotland Ltd, Loch Harport, on 27 May 2025. However, a WF77 Welfare Incident Record and Veterinary Risk Assessment and associated warning letter were held by APHA.

The internal review therefore partially upholds the requester's complaint regarding the omission of information relating to the Loch Harport case, and the relevant documents are now disclosed as Appendices 1 and 2.

In addition, APHA identified further Welfare Incident Records and Veterinary Risk Assessments falling within the scope of the request following the additional review and search activity. These documents are disclosed as Appendices 3 to 38.

All disclosed documents are subject to the redaction of third-party personal data under Regulations 12(3), 13(1) and 13(2A) of the EIRs, and the withholding of information identifying individuals who voluntarily provided information under Regulation 12(5)(f).

Yours sincerely

ACCESS TO INFORMATION TEAM

Email: enquiries@apha.gov.uk

Complaints

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

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

For further information please see their website:

https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/

Animal & Plant Health Agency

Animal and Plant Health Agency
Inverness Field Delivery Services
Longman House
28 Longman Road
Inverness
IV1 1SF

T+44 03000600709

www.gov.uk/apha

[redacted]
[redacted]
Mowi
Farms Office
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX
Emailed to: [redacted]@mowi.com

02 June 2025

Dear [redacted]

The Animal Health and Welfare (Scotland) Act 2006

INEFFECTIVE SALMON EUTHANASIA: WARNING LETTER

As advised during the videocall on 27/05/2025 between the Animal & Plant Health Agency (APHA attendees: [redacted], [redacted]; [redacted], [redacted]) and Mowi (attendee: [redacted], [redacted]), APHA received a complaint inclusive of video about Mowi morting operations at Loch Harport, Portnalong.
As discussed, the remit of APHA in this incident is solely the welfare of fish.
The complainant also raised concerns about certification, health status, biosecurity, notifiable disease of fish at this site; these fall outwith APHA's remit and were passed to Marine Scotland for their consideration. This complaint was also passed to the Highland Council due to their remit in enforcing welfare legislation.

You were shown in full the video received by APHA. [Redacted video link]
This video runs for 3 minutes and 9 seconds in total. You advised you were aware of it and confirmed it pertains to your site in Loch Harport, Portnalong.

The footage shows Mowi operatives euthanising a small number of farmed salmons on the floating platform around sea cages. The salmon are manually removed from sea cages using a net. They use the device referred to in the industry as a priest to euthanise the fish. The restraint of these salmons prior to the concussive blows was inadequate, thus hampering the correct placing of each blow to the head of the animal; in order to be effective blows must hit the head of the animal. This video shows an excessive number of forceful and misplaced blows levelled at these salmons. The operatives also show insufficient coordination between the operative removing the salmon from the cage and the operative delivering the percussive blow to the head, unnecessarily prolonging the time salmons spend out of the water before being euthanised. As a result of the

inadequate technique used and ineffective coordination between operatives it is very likely that the salmons seen in this footage suffered unnecessarily.
One live salmon is seen in a crate which is decanted into a waterless skip without being euthanized.
Towards the end of the footage a Mowi operative throws a fish, the fish hits a colleague and lands to level ground prior to being thrown to a pen. As discussed with you, APHA cannot ascertain if this fish was still alive when this happened. If this fish was still alive this was unnecessary cruelty.

The video shows avoidable suffering that could have been avoided by proper technique and cooperation between staff. You advised that euthanising salmon in the manner seen in this video is against your protocols, standards and company ethos.
I would like to remind you that farmed fish are protected animals under section 17 of the Animal Health and Welfare (Scotland) Act 2006 and unnecessary suffering must be prevented as it is an offence under section 19 of the Animal Health and Welfare (Scotland) Act 2006 (See Annex).

Due to the seriousness of the issue, you advised that Mowi have taken corrective actions including:

- An internal investigation of the incident.
- Senior management are directly involved in managing this incident: Mowi's [redacted], [redacted] and yourself [redacted] have been meeting with all staff from the site.
- Training on welfare and euthanasia has been carried out on Thursday 22nd May by your [redacted] on site with all staff.
- Follow up visits by yourself ([redacted]) and your [redacted] are scheduled monthly on site.
- All [redacted] from all sites have been also contacted by yourself ([redacted]) directly and also separately by your [redacted] to ensure best practices are followed at all times and your disciplinary process is understood by all.
- Mowi's Standard Operating Procedures on welfare, anaesthesia and culling have been reviewed.
- New welfare training has been developed and will very soon be available for all your staff to do (compulsory) on your training platform, Mowi Academy.
- All health managers across the company are in the process of retraining all of your staff on all of your sites (practical training).
- Priests used to cull fish have been reviewed and optimised (size and availability on all sites).
- Overdose anaesthesia has been discussed as an alternative to percussion for sites where suitable.

CONCLUSION

The Animal & Plant Health Agency have assessed the allegations and video provided by the complainant and, as regards their welfare remit, conclude that salmon shown in the video very likely have suffered unnecessarily due to ineffective euthanasia carried out at your site in Loch Harport, Portnalong.

APHA take the welfare of fish very seriously and will inspect operations at Loch Harport, Portnalong, by attending future morting operations to verify that the corrective actions you advised of are implemented; this may be unannounced.

This letter is without prejudice to any further enforcement or other action, which may be taken at a later date.

Please contact me if you wish to discuss any aspect of this letter

Yours sincerely,

[REDACTED SIGNATURE BLOCK]

[redacted]

APHA [redacted]

Cc [redacted], [redacted], The Highland Council.
Cc [redacted], [redacted], APHA.

Annex legislation

The Animal Health and Welfare (Scotland) Act 2006,
Part 2
Section 17 and 19

17 Protected animals
(1) In this Part, an animal is a "protected animal" if it is—
(a) of a kind which is commonly domesticated in the British Islands,
(b) under the control of man on a permanent or temporary basis, or
(c) not living in a wild state.

19 Unnecessary suffering
(1) A person commits an offence if—
(a) the person causes a protected animal unnecessary suffering by an act, and
(b) the person knew, or ought reasonably to have known, that the act would have caused the suffering or be likely to do so.
(2) A person who is responsible for an animal commits an offence if—
(a) the person causes the animal unnecessary suffering by an act or omission, and
(b) the person knew, or ought reasonably to have known, that the act or omission would have caused the suffering or be likely to do so.
(3) A person ("person A") who is responsible for an animal commits an offence if—
(a) another person causes the animal unnecessary suffering by an act or omission, and
(b) person A—
(i) permits that to happen, or
(ii) fails to take such steps (whether by way of supervising the other person or otherwise) as are reasonable in the circumstances to prevent that happening

https://www.legislation.gov.uk/asp/2006/11/section/17 Protected animals.
https://www.legislation.gov.uk/asp/2006/11/section/19 Unnecessary suffering.

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	14/05/2025	Referral	☐
Time call / email received :	14:52	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

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)

Letter received in DV mailbox:
RE: URGENT NOTIFICATION - Fish Health and Welfare Concerns at Mowi Loch Harport Facility

"I am writing on behalf [redacted] to notify APHA of serious fish health and welfare concerns at the Mowi salmon farming facility at Loch Harport, Scotland.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Given APHA's role in safeguarding animal health and welfare, and your responsibilities regarding aquaculture health management, we believe you should be aware of video evidence we have obtained showing:

- Prolonged suffering of fish left out of water for extended periods (over one minute, exceeding the 15-second maximum)
- Inappropriate killing methods requiring multiple blows over 20-50 seconds
- Poor handling practices including crushing fish heads underfoot
- Over 18 documented incidents between March 24-28, 2025

These practices raise concerns regarding:
- Compliance with aquatic animal health regulations
- Potential stress-induced health impacts on stock
- Risk of disease transmission through poor welfare practices
- Breach of notifiable disease prevention protocols through inadequate handling

The systematic nature of these violations suggests potential broader implications for:
1. Fish health status at the facility
2. Biosecurity protocols
3. Compliance with health certification requirements
4. Risk to Scotland's aquaculture health status

We formally request:

1. Investigation of fish health and welfare practices at this facility
2. Assessment of compliance with aquatic animal health regulations
3. Review of health certification status
4. Enforcement action under relevant legislation

Video evidence is available at:

We are prepared to provide full cooperation and additional evidence to support your investigation.
[Redacted video link]

Yours sincerely,

[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 Harport, on Skye

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:

N/A

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:	
Email:	mailto:[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Loch Halport
Isle of Skye

Likely CPH:	N/A
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	No
(S & W only) SBI/CRN/BRN	N/A
(S & W only) On current XC selection? (Yes / No)	No
Last Sam welfare inspection date (N/A if not applicable):	N/A
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

Joint visit to be organised with Fish health directorate.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

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

Date inspection required by (N/A if not applicable):	TBC
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	14/05/2025
VRA Time:	16:10

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): As above	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):
	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 [redacted]@apha.gov.uk and [redacted]@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).

Animal needs have been shown not to have been met. Video shows fish being despatched with a large number of blows with the priest and not accurately aimed, on more that 1 occasion.
Time out of the water prior to despatching with a percussive blow exceeds 15 seconds on more than one occasion.
Footage shows fish in the dead box still moving, this was seen by at least 2 staff members but the fish were not checked prior to being tipped into the lidded box for mort disposal.
A staff member throws what appears to be a smaller, possible cleaner fish at another staff member. This small fish is then checked and thrown back into the sea cage.

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

To try arrange a joint inspection with Fish Health inspectorate if possible

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable): 29/05/2024

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): [redacted]

Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	15/05/2024
Local Assessment time:	14:00

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4650282

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:	[redacted]	Report type: Complaint	☒
Date:	11/08/2025	Referral	☐
Time call / email received :	14:53	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	
Previously reported (Yes / No)	yes
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)

From DV email inbox two emails about the same place:

FW_ More mortalities
Wester Ross Fisheries

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4650282

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:	[redacted]	Report type: Complaint	☒
Date:	11/08/2025	Referral	☐
Time call / email received :	14:53	Origin:	Select Origin

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- Is notifiable disease suspected? (by CAD vet/or public)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	
Previously reported (Yes / No)	yes
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)

From DV email inbox two emails about the same place:

FW_ More mortalities
Wester Ross Fisheries

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

FW_ High mortalities & transport of morts.r

Email 1: 'Dear APHA,

I have been in touch recently about Wester Ross Fisheries/Mowi operations in Loch Broom and Little Loch Broom, the situation has not improved since my last email. These sites are regularly beset by high mortalities ([redacted]), currently 12.7% at Ardessie and 5.2% at Ardmair, which equates to thousands of fish suffering and dying - again.
It also appears that Loch Duart are still suffering huge predator losses which must be incredibly stressful for the fish living in the pens.

It is clear that salmon farming companies can absorb huge losses and still make a profit or many sites would have ceased to exist years ago, but from an ethical/welfare stand point this is unacceptable, and would not be tolerated if it was happening year in year out on terrestrial animal farms.

At what point do agencies make the call that some sites should not be allowed to farm salmon if they cant keep a lid on mortalities? Does anyone have that power, and what level of mortality would eventually be found unacceptable?

Kind regards,

[redacted]

Email two has letter attached and is copied in attachments above.

There was a previous WF77 completed on the 16/07/2025 by [redacted] that delt with a similar complaint from the same person.

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. Loch Broom.

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:

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] and [redacted]

Telephone number 1:	
Telephone number 2:	
Email:	[redacted] [redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Badcall Salmon House
Scourie, Lairg
Sutherland
IV27 4TH

[redacted]
Loch Duart Ltd [redacted])
Outer Bay
Loch Droighniche

Likely CPH:	[redacted]
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	n/a
(S & W only) SBI/CRN/BRN	
(S & W only) On current XC selection? (Yes / No)	n/a
Last Sam welfare inspection date (N/A if not applicable):	none
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Previous complaint cam in 7/07/25 and dealt with on 16/07.

From previous WF77:
'*Contacted Loch Duart Salmon and spoke to* [redacted]*, 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).

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 to11/07/25 on15/07/2025. 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*. '

Emailed FHI for further mortality data today to see if situation has changed since previous WF77 was created. FHI responded with this:'

'It appears that the enquirer is looking at the Salmon Scotland data on mortalities which is published monthly in arrears. The percentages being quoted are from the June report which is available here: monthly-mortality-rate-june-2025

We have had recent reports from Ardessie ([redacted]) of increased mortality and I was going to get an inspector to visit this week but Mowi advised on Friday that the site would be fallow in the next few days. The site is a broodstock site and the fish were being transferred to freshwater. Mortalities were being attributed to gill damage due to jellyfish, along with complex gill disease and cardiomyopathy syndrome. Fish were also starting to mature and transfer to freshwater was delayed slightly due to construction challenges at the freshwater site. As it's a broodstock site, the fish are large and low stocking density. The company has advised that the fish are recovering well in freshwater. A total of 8329 fish have been lost on site since the beginning of June, but due to the low numbers of fish on site it represents quite a high mortality – particularly over the last two reports.

We have only had one report this year for Ardmair: Based on the percentage mortality and total mortality during event there would only have been around 31,000 fish remaining on site at the time of the report. The site was harvesting and reported as fallow (they are required to inform us for sea lice counts) in week 28 (week commencing 07/07/2025).

We have not had any further mortality reports for Outer Bay (Loch Droighniche) since we forwarded on at the end of July – see attached email chain. This is also a broodstock site with low numbers of fish on site. They appear to still be stocked having reported a sea lice visual inspection today for week commencing 28/07.'

Appears situation has not changed, historical data was given by complainant, and with new information given today outcome is the same as previous WF77 and inspection not required.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☒
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	na
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	11/08/25
VRA Time:	15:20

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes

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)	n/a
Last Sam welfare inspection date (N/A if not applicable):	none
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	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 [redacted]@apha.gov.uk and [redacted]@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).

See above in VRA

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

See VRA

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable):	
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):	na
Name of APHA representative attending (N/A if not applicable):	na
Role (N/A if not applicable):	na
Veterinarian completing Local Assessment:	[redacted]

Staff number:	[redacted]
Local Assessment date:	11/08/25
Local Assessment time:	15:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	04/12/2025	Referral	☐
Time call / email received :	10:05	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	Unknown
Previous APHA reference (incl. FSA referrals):	NA

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)

3X WF77s generated from same email.

Dear APHA,

I'm afraid its me again, but I cant stop raising these fish health issues until I see that something is being done to address them. The figures for Loch Duart this month are appalling, this is ongoing.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant: [redacted]

Loch a Chairn Bhain 20.3% of fish (90'000 fish in one week at the end of October)
Bad Caul 13.2% of fish which is 40'000 fish
Gob na Hoe - 45.2% of fish, a whopping half a million fish dead

These deaths are attributed to 'gill health, jellyfish and plankton', none of these issues can be avoided in open net salmon farming, and all are getting worse as water temperatures go up. These fish also have high sea lice numbers which impacts wild fish. I believe fish are covered in the animal health and welfare act 2006 so is there anything you can do to enforce better living conditions for fish, or shutting down sites that have persistently high mortalities?

I hope that you can help in some way, I'm so fed up with fish being treated as if they are less worthy of care than terrestrial farmed animals.

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.)

Badcall Bay, [redacted]

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:

NA

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:	NA
Telephone number 2:	NA
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):	Loch Duart PLC Floor 3 1 West Regent Street, Glasgow, Scotland, G2 1RW Loch Duart PLC Badcall Salmon House Scourie, Sutherland IV27 4TH, SCOTLAND admin@lochduart.com
Likely CPH:	NA
Telephone number 1:	[redacted]
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	NA
(S & W only) SBI/CRN/BRN	NA
(S & W only) On current XC selection? (Yes / No)	NA
Last Sam welfare inspection date (N/A if not applicable):	Unknown
Ongoing Complex case? (Yes / No)	Unknown
Sensitive case? (Yes / No)	Unknown
Listed on Hazard Database? (Yes / No)	Unknown

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))

Risk assessed as medium due to high numbers of mortalities, 13.2% of fish as per complaint.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	11/12/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	

VRA Date:	04/12/2025
VRA Time:	15:59

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
Amended CPH:	N/A

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

Badcall Salmon House ([redacted]
Scourie
SUTHERLAND
Highland
IV27 4

Telephone number 1:	
Telephone number 2:	
(S & W only) Active XC claimant? (Yes / No)	N/A
(S & W only)SBI/CRN/BRN from CSC database:	
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	
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 [redacted]@apha.gov.uk and [redacted]@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).

BADCALL BAY [redacted]) 04/12/2025
The following relates to Badcall Bay only. I do not have local knowledge about this specific complaint. In summary, the complainant reports at Badcall a mortality of 13.2%, (40'000 salmon) for “this month”. [redacted] reported on December the 4th .The complainant notes that the mortality would be attributed to 'gill health, jellyfish and plankton'. The latter concern the complainant because “none of these issues can be avoided in open net salmon farming”. The complainant has also concerns about temperatures

rising making things worse for salmons. The complaint has also concerns about unspecified high lice levels which [redacted] notes would affect wild salmon.

I have contacted FHI to find out official data about mortality and sea lice at Badcall over December to see if any action for APHA.
Mortality in December: 11.65% (first week); 2.77%; 1.75%; then 0.27% (end of December). Thus, there was a peak of 11.65% at the beginning of the month, however a steady decline of mortality in December to 0.27% by the end of the month. This mortality was reported by FHI as due to Complex Gill Disease, Amoebic Gill Disease both known to have the potential to cause severe mortality. The company is reported to have treated with freshwater treatment over the period.
Sea lice in salmon at Badcall in December: 1.52% (beginning of month); 1.28%; 0.2%; 0.77% (end of the month). Sea lice had been high at the end of October-beginning of November when FHI stepped in. The site treated then and the sea lice levels came down. Considering the data for lice in December which are low there is no action for APHA.
As regards the complainant concerns about potential impact of lice in **wild salmon**, the latter is out with APHA remit as the Agency do not have remit/power in wild salmon.

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

N/A

Name of LA:

Highland Council

Name of LA contact:

N/A

Local Assessment inspection requirement: (select one option only)

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

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

After a peak at the beginning of the month salmon mortality came down to 0.27% (see above). The mortality was due to disease and the site carried out treatment. Thus, no action for APHA.
Sea Lice at Badcall: in December the levels were low (see above), thus no action for APHA.
As regards the concerns about potential sea lice in wild salmon, this is out with APHA's remit so no further action. On 11/03/2026 FHI confirmed they do not intend to visit this site.
In light of the above findings there is no action for APHA.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	Started 05/12/2025
Local Assessment time:	Approximately 08:45

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4699457

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:	[redacted]	Report type: Complaint	☒
Date:	25/7/2025	Referral	☐
Time call / email received :	13:19	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	No
Previous APHA reference (incl. FSA referrals):	NA

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)

"Please could you advise if you are aware of the extremely high mortality figures released by Salmon Scotland for May 2025 at the above three Bakkafrost farms.

I summarise below.

Quarry point. Site ID [redacted]

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

May 2025 mortality reported 7.5% (viral disease). Over the last 12 months the sum of monthly mortalities is now 35%.

Gob a Bharra. Site ID [redacted]
This has been in production for 7 months . Mortality in May 2025 was 5.2% and already total monthly mortality at this site is 15%

Geasgill. Site ID [redacted]
Mortality in May was 6%. Its been in production for 2 months and has lost 6.5% over this period."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

APHA Delivery Team for this location: Scotland - Perth

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

NA

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:	
Telephone number 2:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Salmon Farm
(Quarry Point
Gob A Bharra
Geasgill)

Likely CPH:	
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	
(S & W only) SBI/CRN/BRN	

(S & W only) On current XC selection? (Yes / No)	
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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))

Higher mortality rates, a discussion regarding these sites increased rates should be had with the operator.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	8/8/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	No
VRA Date:	25/7/2025
VRA Time:	14:38

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

Remote meeting with company scheduled for 05/08/2025.

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable):	08/08/25
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):	APHA
Name of APHA representative attending (N/A if not applicable):	[redacted]
Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	28/07/2025
Local Assessment time:	16:07

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4699457

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:	[redacted]	Report type: Complaint	☒
Date:	25/7/2025	Referral	☐
Time call / email received :	13:19	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	No
Previous APHA reference (incl. FSA referrals):	NA

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)

"Please could you advise if you are aware of the extremely high mortality figures released by Salmon Scotland for May 2025 at the above three Bakkafrost farms.

I summarise below.

Quarry point. Site ID [redacted]

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

May 2025 mortality reported 7.5% (viral disease). Over the last 12 months the sum of monthly mortalities is now 35%.

Gob a Bharra. Site ID [redacted]
This has been in production for 7 months . Mortality in May 2025 was 5.2% and already total monthly mortality at this site is 15%

Geasgill. Site ID [redacted]
Mortality in May was 6%. Its been in production for 2 months and has lost 6.5% over this period."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

APHA Delivery Team for this location:

Scotland - Perth

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

NA

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:	
Telephone number 2:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Salmon Farm
(Quarry Point
Gob A Bharra
Geasgill)

Likely CPH:	
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	
(S & W only) SBI/CRN/BRN	

(S & W only) On current XC selection? (Yes / No)	
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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))

Higher mortality rates, a discussion regarding these sites increased rates should be had with the operator.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	8/8/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	No
VRA Date:	25/7/2025
VRA Time:	14:38

Local Assessment - To be completed by the local field team

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

Amended owner/keeper name and

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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

Remote meeting with company scheduled for 05/08/2025.

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable):	08/08/25
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):	APHA
Name of APHA representative attending (N/A if not applicable):	[redacted]
Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	28/07/2025
Local Assessment time:	16:07

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	04/12/2025	Referral	☐
Time call / email received :	10:05	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	Unknown
Previous APHA reference (incl. FSA referrals):	NA

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)

3X WF77s generated from same email.

Dear APHA,

I'm afraid its me again, but I cant stop raising these fish health issues until I see that something is being done to address them. The figures for Loch Duart this month are appalling, this is ongoing.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

[redacted]

Loch a Chairn Bhain 20.3% of fish (90'000 fish in one week at the end of October)
Bad Caul 13.2% of fish which is 40'000 fish
Gob na Hoe - 45.2% of fish, a whopping half a million fish dead

These deaths are attributed to 'gill health, jellyfish and plankton', none of these issues can be avoided in open net salmon farming, and all are getting worse as water temperatures go up. These fish also have high sea lice numbers which impacts wild fish. I believe fish are covered in the animal health and welfare act 2006 so is there anything you can do to enforce better living conditions for fish, or shutting down sites that have persistently high mortalities?

I hope that you can help in some way, I'm so fed up with fish being treated as if they are less worthy of care than terrestrial farmed animals.

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.)

Gob na Hoe
Site ID: [redacted]

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:

NA

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:	NA
Telephone number 2:	NA
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):		
Loch Duart PLC Floor 3 1 West Regent Street, Glasgow, Scotland, G2 1RW Loch Duart PLC Badcall Salmon House Scourie, Sutherland IV27 4TH, SCOTLAND admin@lochduart.com	Likely CPH:	NA
	Telephone number 1:	[redacted]
	Telephone number 2:	
	(Scotland & Wales only) Active XC claimant? (Yes / No)	NA
	(S & W only) SBI/CRN/BRN	NA
	(S & W only) On current XC selection? (Yes / No)	NA
	Last Sam welfare inspection date (N/A if not applicable):	Unknown
	Ongoing Complex case? (Yes / No)	Unknown
	Sensitive case? (Yes / No)	Unknown
	Listed on Hazard Database? (Yes / No)	Unknown

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))

Risk assessed as medium due to high numbers of mortalities, 45.2% of fish, as per complaint.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	11/12/2025

Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	04/12/2025
VRA Time:	15:59

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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

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

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):

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

Role (N/A if not applicable):

Veterinarian completing Local Assessment:

Staff number:

Local Assessment date:

Local Assessment time:

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	16/12/25	Referral	☐
Time call / email received :	15.50	Origin:	Informant

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) N/A
- What notifiable disease is suspected? N/A
- Duty / RTG vet and VENDU informed of possibility of ND? N/A

Third party reference	N/A
Previously reported (Yes / No)	NO
Previous APHA reference (incl. FSA referrals):	N/A

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)

[redacted] wrote to Duty Vet on Behalf of [redacted]

They received footage we have received of Portree fish farm, filmed between 7-13 October 2025. The footage can be found in the annex below.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Site ID [redacted]

Biosecurity video [Redacted video link and text]

Animal welfare video
[Redacted video link and text]

The footage shows lapses in biosecurity, serious welfare issues and potential breaches of law.

Biosecurity

Footage shows:

- A worker kicking dead salmon from a boat into the sea (8 seconds)
- A worker throwing a dead fish into the sea - note the pen's nets have been removed (38 seconds)
- Several salmon lying on the walkway due to some sort of failing in the airlift system (43 seconds)
- The airlift pipe outlet is shown to be missing the brail net and pumping directly into the sea (1 minute 2 seconds)
- Cranes on two boats are seen to lift fully loaded mort bins over open water with no lids (1 minute 7 seconds)
- Full mort bin without a lid is lifted from boat to barge (1 minute 41 seconds, 2 minutes 35 seconds)
- Unlikely to cause any biosecurity issues but there appears to be a pipe failure underwater indicating further problems with their airlift system (2 minutes 58 seconds)

Welfare

Footage shows:

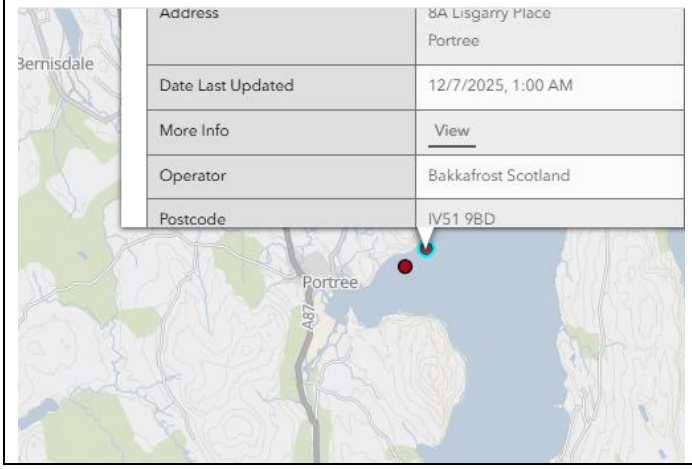
- A fish is seen thrashing around as it is pumped into the brail net (25 seconds)
- At least 6 fish are seen thrashing around as the brail net is lifted (1 minute 15 seconds)
- Fish is still moving (2 minutes 33 seconds) before being dropped into ensiler one and half minutes later
- At least 3 fish thrashing around inside brail net (5 minutes 3 seconds)
- One fish is lifted by the tail and killed with a priest after suffocating for over a minute (6 minutes 23 seconds)
- Blurry footage but obvious movement in brail net (6 minutes 36 seconds)
- Fish trashing around in brail net (7 minutes 23 seconds, 8 minutes 19 seconds, 8 minutes, 58 seconds, 9 minutes 41 seconds)
- One fish killed with a priest after suffocating for over a minute (10 minutes 29 seconds).



FW_ Biosecurity
crime at Bakkafrost I

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Bakkafrost Scotland,
Portree Farm
8A Lisgarry Place
Portree, IV51 9BD
Site ID FS1318



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:

N/A

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:	N/A
Telephone number 2:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Scotland,
Portree Farm
8A Lisgarry Place
Portree, IV51 9BD

Likely CPH:	N/A
Telephone number 1:	[redacted]
Telephone number 2:	N/A
(Scotland & Wales only) Active XC claimant? (Yes / No)	N/A
(S & W only) SBI/CRN/BRN	N/A
(S & W only) On current XC selection? (Yes / No)	N/A

Last Sam welfare inspection date (N/A if not applicable):	N/A
Ongoing Complex case? (Yes / No)	NO
Sensitive case? (Yes / No)	NO
Listed on Hazard Database? (Yes / No)	N/A

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))

The VRA indicates farm animal needs are not being met but there is no suspicion of current farm animal suffering. This case is assessed as a MEDIUM PRIORITY; however, it can be re-evaluated following local assessment.
There could be also potential breaches of ABP Regulation.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	23/12/25
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	16/12/25
VRA Time:	16:43

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:

Farm site not specified, several Portree sites possible	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):	
	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 [redacted]@apha.gov.uk and [redacted]@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).

The Portree Bakkafrost sites are fallow, as of week 43, no current animal suffering. The welfare issues highlighted in the video all pertain to removing of morts from sea cages. All salmon are pumped into a net and lifted by crane onto the boat where any salmon still alive are killed by priest as soon as is possible. The movements seen in the net are weak and the majority of the fish cannot be reliably categorised as alive. The very few salmon moving on arrival at boat are dealt with immediately by staff standing supervising the mort removal. No current welfare concerns regarding these procedures as shown in the video. The biosecurity issues are being addressed by FHI.

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

Not discussed as no welfare concerns currently

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

There is no current animal suffering as sites are fallow. No non-compliances with current welfare legislation were observed.

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):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	22/12/2025
Local Assessment time:	16:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	28/7/2025	Referral	☐
Time call / email received :	11:25	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	
Previously reported (Yes / No)	Yes
Previous APHA reference (incl. FSA referrals):	[redacted]

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)

" Dear The Crown Office and Procurator Fiscal Service [redacted] in relation to a Fish Health Inspectorate Report ("the Report"). The Report followed an inspection visit to Mowi Scotland Limited's salmon farm at Torridon ("the Site") on 9 October 2024. The Report identified clear instances of animal cruelty on the Site, and is appended to this letter.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Lumpfish and wrasse are used on the Site as ‘cleaner’ fish to remove sea-lice from the salmon. Between February and October 2024, almost half the lumpfish died as a result of environmental conditions and freshwater treatments. Please see the appended report on the second page, although labelled ‘Page 1 of 1’, stating: ‘Since Feb 2024, 60,000 lumpfish have been input onto site and as of today the site has 33,924 lumpfish’. In addition, the report notes that by October 2024 there were 21,274 reported wrasse remaining out of 70,665 wrasse that were input onto the site since August 2023; the mortality has also, in part, been attributed to freshwater treatments.

The report states that lumpfish were previously removed prior to freshwater treatment measures being performed on the salmon, via grading, due to their small size. In 2024, however, this changed. Mowi Scotland Limited stopped removing lumpfish prior to treatment. Via the same report linked above, and on the same page, the report states: ‘Lumpfish mortalities in 2024 have been attributed mainly to environmental conditions (microjellies and plankton) as well as freshwater treatments. Gill issues on

1[redacted]

site from December 2023 until March 2024 which then began again at the end of August. Lots of microjellies in the water - counts ranging from 1000 to 2200 cells per milliliter in some samples taken daily on site during June/July. Most recent (7th October) had 100 cells/ml. Treatments - Freshwater treatments were carried out in March, July and September 2024. September treatments carried out on 8th, 9th, 11th, 13th, 15th, 17th and 18th. Some days were weathered off. Averaging about 2 cages per day. Last year's treatments could grade out the lumpfish due to their small size however the most recent treatments have happened on a boat that can't grade out lumpfish’.

As a result, the lumpfish and wrasse were subjected to inappropriate, unnecessary, and often fatal treatments. A study from another major fish farm producer, Bakkafrost, showed that it experienced major cleanerfish losses in 2022 due to freshwater treatments.1 During an investigation by the FHI, Bakkafrost’s RSPCA Assured Plocrapol farm was found to have lost 99.71% of its cleanerfish (lumpfish) in one week due to freshwater treatments in October 2022.2

The decision by Mowi Scotland Limited to stop removing lumpfish on the Torridon site prior to treatment was unnecessary, being a departure from previous practices. It caused death to lumpfish. It was, or should have been, obvious that subjecting lumpfish to such treatment would cause suffering. There is evidence to show that cleanerfish have high mortality from handling of this kind. The Scottish Government’s Fish Health Inspectorate clearly notes: ‘It has been accepted by industry that freshwater treatments will lead to elevated lumpfish mortalities’3

Further, the May 2024 RSPCA welfare standards (p13) note: ‘Exposing cleanerfish to any non-medicinal treatments intended for the treatment of salmon must be risk-assessed. They must not be exposed to any nonmedicinal treatments which will cause injury or suffering as identified by the risk assessment. If cleanerfish do undergo a non-medicinal treatment, the welfare impacts must be recorded. Recent on-farm experience and data from countries that use cleanerfish in Atlantic

salmon production has found that some non-medicinal treatments can cause significant welfare issues to cleanerfish, including mortality. Farms must risk-assess these treatments and the impact on cleanerfish welfare before any cleanerfish undergo treatments. There is a zero tolerance if the risk assessment finds there is a risk of injury or suffering. Several countries have prohibited cleanerfish undergoing lice treatments using nonmedicinal treatments4 and the RSPCA will keep this under review. The reason for the prohibition is that sea lice do not generally attach to cleanerfish so treating an animal for a disease they don't have is a violation of their animal welfare laws5'.
5 https://science.rspca.org.uk/documents/d/science/salmon-standards-justificatio n-2024 4 https://ilaks.no/i-strid-med-dyrevelferdsloven-a-la-rensefisk-gjennomga-lakselusbehandling/ 3 https://storage.googleapis.com/inspection_case_information/2021-0309_FS1291.pdf 2 https://www.gov.scot/binaries/content/documents/govscot/publications/transpare ncy-data/2022/03/fish-health-inspectorate-case-information-2022/documents/octo ber-2022/case-20220425-20220468/case-20220425-20220468/govscot%3Adocument/Case s%2B20220425-20220468.pdf 1 https://wildfish.org/wp-content/uploads/2025/03/WildFish-Report_Responsibly-Fa rmed_March-2025.pdf 2 Advocates for Animals is a company limited by guarantee (company number 11340220). It is regulated by the Solicitors Regulation Authority (SRA number 651641)

The Government advisory body, the Animal Welfare Committee, also notes: 'Industry should ensure that systems are designed to minimise stress on cleaner fish during feed withdrawal, gathering and separation6.'
Accordingly, Mowi Scotland Limited may have committed an offence in terms of section 19 of the Animal Health and Welfare (Scotland) Act 2006.
We will be grateful to learn what enforcement action has resulted or will result from this breach. In particular, we will be grateful if you can confirm that Mowi Scotland Limited is being prosecuted for its clearly criminal act.
Kind regards

[redacted]

Appendix "

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Mowi Torridon [redacted]

Torridon fish farm
Shieldaig
Strathcarron
Postcode IV54 8XN

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:

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:	
Telephone number 2:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Torridon fish farm
Shieldaig
Strathcarron
Postcode IV54 8XN

Likely CPH:	[redacted]
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	
(S & W only) SBI/CRN/BRN	
(S & W only) On current XC selection? (Yes / No)	
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	YES
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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))

Complaint outlines high mortalities in cleaner fish at a single site. The dates in which this has occurred is last year in October 2024.

[redacted] has completed a report on the 28/01/2025 regarding increased mortality rate of cleaner fish within this site. This was relating to the previous batch, which would cover the dates listed in the complaint. As this has previously been investigated, and actioned this would be triaged as a negligible with no inspection required, and low risk.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☒
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	NA
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	No
VRA Date:	28/7/2025
VRA Time:	16:36

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):
	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 [redacted]@apha.gov.uk and [redacted]@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).

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

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

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):	
Name of APHA representative attending (N/A if not applicable):	
Role (N/A if not applicable):	
Veterinarian completing Local Assessment:	
Staff number:	
Local Assessment date:	
Local Assessment time:	

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	03/11/2025	Referral	☒
Time call / email received :	09:56	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	N/A
Previously reported (Yes / No)	Not known
Previous APHA reference (incl. FSA referrals):	Not known

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)

[redacted] [redacted]
The sites are currently facing a number of challenges and whilst actions are being taken to help alleviate these there are factors influencing how and when they can be delivered, therefore I would like to raise this as a potential welfare concern.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant: [redacted]

The inspections were conducted after Salmosan treatments had been administered. During the inspection skin abrasions on the flanks and head damage could be observed on a small amount of the population. The fish removed for sea lice counts also had evidence of some skin damage, however these areas were mostly clean of parasites. Adult female counts remain high (above 6/fish), however other stages seem to have reduced significantly post treatment.

. Some fish with severe sea lice damage were observed among the moribunds (red heads – these were less than 2 per pen) Calva Bay [redacted] had a small number of lethargic fish observed.

Mortality numbers for the sites in week 42 were 1.34% (2,972) for Calva, Week 43 were 2.29% (4,992) for Calva.

AGD became prevalent on the Badcall Bay ([redacted]) site in week 16 2025. Freshwater treatments for gills using Loch Duart Plc's pump barge and tarp system were implemented. In weeks 21 & 22, pre adults were increasing on the Badcall site but adult females were not increasing. On this basis, a Salmosan treatment was delivered during a planned thinning operation that moved fish from Badcall to stock Calva Bay ([redacted]). This was effective at maintaining low levels of adult females until week 30 when lice numbers began to rise. In week 29 – 30 a FW treatment was administered to manage the AGD. This however had minimal impact on the rising lice numbers. In week 33 a further FW treatment was administered: the Kvaloy however could only treat for 3.5 hours with the use of FLS on discharge. Clearance of leps during this treatment was poor due to the short time they were exposed to FW. Due to the poor clearance and steadily rising lice numbers after the Kvaloy wellboat treatment in week 33, it was then decided that cleaner fish must be reintroduced to help manage the increasing adult lice number at the site (At the start of 2025 it was decided that cleaner fish would not be stocked on sites with active AGD management plans as these involved regular FW treatments. It was considered that the FLS system would be sufficient to provide lice clearance if required due to the low lice levels at the time). Cleanerifsh were stocked in week 36 and given 2 weeks of settling time. However by then the cleaner fish were possibly overwhelmed by the lice levels (adult females/fish were above 10 by week 38). A Salmosan treatment was scheduled but the start date was frequently deferred: the vessel was due at Badcall on the 03/10/25 but got pushed back due to mechanical repairs. Then the onset of Storm Amy at the start of October (4/10/25 onwards) and the latent weather of the following week added additional delays to the treatment starting. Treatments however were begun on the 16/10/25 and are currently ongoing. (similar weather/boat mechanical issues affected treatments at the Clashnessie and Calva Bay sites).

Ongoing strategy for the prevention, control and reduction of lice: Salmosan, freshwater and FLS treatments will be ongoing to establish and maintain control over lice numbers on site, along with additional cleanerfish stocking. The [redacted] is now chartered full time to Loch Duart Plc and an adjustable grader is to be fitted to facilitate the easier removal of cleaner fish from pens (so cleaner fish and FW treatments can be used simultaneously). Currently only fish above an average size

of 2.8kg can be removed. The [redacted] will also be available full time for treatments from the 28/10/25. Tarp treatments will also be available but as a last resort dependent on weather and tidal conditions.

I hope this helps provide a better picture of how sea lice numbers have risen and why treatments have been delayed. A number of advisory/warning letters have been issued already with regards to sea lice management, and more recommendations will be issued to the company once the findings of the enhanced sea lice inspections have been reviewed.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

[redacted]

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:

Not known

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:	Not known
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

CALVA
Salmon House
Scourie
SUTHERLAND
Highland

Likely CPH:	[redacted]
Telephone number 1:	[redacted]
Telephone number 2:	Not known
(Scotland & Wales only) Active XC claimant? (Yes / No)	NO

IV27 4TH	
(S & W only) SBI/CRN/BRN	Not known
(S & W only) On current XC selection? (Yes / No)	No
Last Sam welfare inspection date (N/A if not applicable):	Remote Inspection 24/9/25
Ongoing Complex case? (Yes / No)	Yes
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

Ongoing concerns from Fish Health Inspector – ongoing case monitored by [redacted] and [redacted] – WF77 requested

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	12/01/2026
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	29/11/2025
VRA Time:	10:51

Local Assessment - To be completed by the local field team

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

Amended owner/keeper name and address (include postcode):	Amended CPH:	
[redacted]	Telephone number 1:	
	Telephone number 2:	
	(S & W only) Active XC claimant? (Yes / No)	
	(S & W only)SBI/CRN/BRN from CSC database:	N/K
	(S & W only) On current XC selection? (Yes / No)	N/A
	Last Sam welfare inspection date (N/A if not applicable):	
	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 [redacted]@apha.gov.uk and [redacted]@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).

This is a retrospective assessment, and it is restricted to Calva Bay site, [redacted]. I do not have local knowledge of this site. Therefore, I have looked retrospectively at published data on mortality, sea lice and treatments to understand if any action for the Animal & Plant Health Agency (hereafter APHA). FHI had visited the site and served written advice to the customer as regards sea lice levels.
Mortality: wc 27/10/25 was: 1.12%, subsequent weeks 1.06%; 1.14%, 1.68% and 1.24% on week ending 30/11/2025. Mortality levels were relatively low. They were explained by diseases including CGD and AGD and treatment is noted to have been carried out in the period including freshwater treatment and FLS. Thus, no action for APHA.

Sea lice: from 27/10/25: 4.45%, subsequent weeks as follows: 5.98%; 8.68%; n/available; 0.75%; 1.63%; 0.82%; 1.87%; and 1.67% on week 22/12/2025. It is recorded that the site sought veterinary advice. Treatments are recorded: freshwater and FLS. Thus, sea lice levels peaked at 8.68% but the levels reduced dramatically by the end of the period. It is noteworthy that FHI who had served a

notice to the business about sea lice issue have advised that they do not intend to revisit. Thus, no action for APHA.

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

N/A

Name of LA:

Highland Council

Name of LA contact:

N/A

Local Assessment inspection requirement: (select one option only)

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

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

Relatively low levels of mortality which were explained by diseases for which the company treated. Sea lice levels peaked at 8.68% but they dramatically went down over the following weeks below 2%. The site sought veterinary advice and treated for sea lice with levels below 2%. Moreover, officials of FHI, who had served a notice to the business about sea lice levels, have advised that they do not intend to revisit the site thus no further action for APHA.

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: [redacted]

Staff number: [redacted]

Local Assessment date: 10/03/2026

Local Assessment time: 10:40

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	03/11/2025	Referral	☒
Time call / email received :	09:56	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

	N/A
Previously reported (Yes / No)	Not known
Previous APHA reference (incl. FSA referrals):	Not known

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)

[redacted]. The sites are currently facing a number of challenges and whilst actions are being taken to help alleviate these there are factors influencing how and when they can be delivered, therefore I would like to raise this as a potential welfare concern.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant: [redacted]

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	03/11/2025	Referral	☒
Time call / email received :	09:56	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

	N/A
Previously reported (Yes / No)	Not known
Previous APHA reference (incl. FSA referrals):	Not known

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)

[redacted]. The sites are currently facing a number of challenges and whilst actions are being taken to help alleviate these there are factors influencing how and when they can be delivered, therefore I would like to raise this as a potential welfare concern.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant: [redacted]

The inspections were conducted after Salmosan treatments had been administered. During the inspection skin abrasions on the flanks and head damage could be observed on a small amount of the population. The fish removed for sea lice counts also had evidence of some skin damage, however these areas were mostly clean of parasites. Adult female counts remain high (above 6/fish), however other stages seem to have reduced significantly post treatment.

Some fish with severe sea lice damage were observed among the moribunds (red heads – these were less than 2 per pen). Clashnessie ([redacted] had a small number of lethargic fish observed.

Mortality numbers for the sites in week 42 were 1.35% (659) for Clashnessie. Clashnessie is expected to fallow in the next few weeks (weather dependent).

AGD became prevalent on the Badcall Bay ([redacted]) site in week 16 2025. Freshwater treatments for gills using Loch Duart Plc's pump barge and tarp system were implemented. In weeks 21 & 22, pre adults were increasing on the Badcall site but adult females were not increasing. On this basis, a Salmosan treatment was delivered during a planned thinning operation that moved fish from Badcall to stock Calva Bay ([redacted]). This was effective at maintaining low levels of adult females until week 30 when lice numbers began to rise. In week 29 – 30 a FW treatment was administered to manage the AGD. This however had minimal impact on the rising lice numbers. In week 33 a further FW treatment was administered: the [redacted] however could only treat for 3.5 hours with the use of FLS on discharge. Clearance of leps during this treatment was poor due to the short time they were exposed to FW. Due to the poor clearance and steadily rising lice numbers after the [redacted] wellboat treatment in week 33, it was then decided that cleaner fish must be reintroduced to help manage the increasing adult lice number at the site (At the start of 2025 it was decided that cleaner fish would not be stocked on sites with active AGD management plans as these involved regular FW treatments. It was considered that the FLS system would be sufficient to provide lice clearance if required due to the low lice levels at the time). Cleanerifsh were stocked in week 36 and given 2 weeks of settling time. However by then the cleaner fish were possibly overwhelmed by the lice levels (adult females/fish were above 10 by week 38). A Salmosan treatment was scheduled but the start date was frequently deferred: the vessel was due at Badcall on the 03/10/25 but got pushed back due to mechanical repairs. Then the onset of Storm Amy at the start of October (4/10/25 onwards) and the latent weather of the following week added additional delays to the treatment starting. Treatments however were begun on the 16/10/25 and are currently ongoing. (similar weather/boat mechanical issues affected treatments at the Clashnessie and Calva Bay sites).

Ongoing strategy for the prevention, control and reduction of lice: Salmosan, freshwater and FLS treatments will be ongoing to establish and maintain control over lice numbers on site, along with additional cleanerfish stocking. The [redacted] is now chartered full time to Loch Duart Plc and an adjustable grader is to be fitted to facilitate the easier removal of cleaner fish from pens (so cleaner fish and FW treatments

can be used simultaneously). Currently only fish above an average size of 2.8kg can be removed. The [redacted] will also be available full time for treatments from the 28/10/25. Tarp treatments will also be available but as a last resort dependent on weather and tidal conditions.

I hope this helps provide a better picture of how sea lice numbers have risen and why treatments have been delayed. A number of advisory/warning letters have been issued already with regards to sea lice management, and more recommendations will be issued to the company once the findings of the enhanced sea lice inspections have been reviewed.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

[redacted]

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:

Not known

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:	Not known
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Clashnessie
Salmon House
Scourie
SUTHERLAND
Highland

Likely CPH:	[redacted]
Telephone number 1:	[redacted]
Telephone number 2:	Not known
(Scotland & Wales only) Active XC claimant? (Yes / No)	No

IV27 4TH	
(S & W only) SBI/CRN/BRN	Not known
(S & W only) On current XC selection? (Yes / No)	No
Last Sam welfare inspection date (N/A if not applicable):	Remote Inspection 24/9/25
Ongoing Complex case? (Yes / No)	YES
Sensitive case? (Yes / No)	NO
Listed on Hazard Database? (Yes / No)	NO

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))

Ongoing concerns from Fish Health Inspector – ongoing case monitored by [redacted] and [redacted] – WF77 requested

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	12/01/2026
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	29/12/2025
VRA Time:	11:00

Local Assessment - To be completed by the local field team

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

Amended owner/keeper name and address (include postcode): [redacted]	Amended CPH: N/A [redacted]
	Telephone number 1: [redacted]
	Telephone number 2:
	(S & W only) Active XC claimant? (Yes / No): N/A
	(S & W only)SBI/CRN/BRN from CSC database: N/A
	(S & W only) On current XC selection? (Yes / No): N/A
	Last Sam welfare inspection date (N/A if not applicable):
	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 [redacted]@apha.gov.uk and [redacted]@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).

This is a retrospective assessment and it is restricted to Clashnessie Bay. I do not have local knowledge of this incident at Clashnessie ([redacted]) so I have retrospectively looked at the publicly available data for this site, for the period (Nov-Dec 2025), to see if any action for the Animal & Plant Health Agency (hereafter APHA).
Mortality: starting at week 17/11: 1.18% then 1.21%; 2.11%; and 1.56% in week ending 14/12; so the mortality levels were relatively low. This mortality was explained by disease including AGD, CGD. Treatment was carried out by the site including freshwater and FLS over the period.
Sea lice: no data available for the first two weeks of November then the following weeks as follows: 8.25% (peak), 1.8%, 1.15%, 1.3%, n/available; and 1.8% in week beginning 22/12. Thus, after a peak the situation has improved dramatically. It is noteworthy that this site has been fallow since week commencing 12/01/2026. Thus, no action for the Animal & Plant Health Agency.

Name of LA:

N/A	Highland Council
	Name of LA contact: N/A

Local Assessment inspection requirement: (select one option only)

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

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

Deaths were due to disease and were explained. Treatments were carried out by the company. Sea lice levels peaked at 8.25% but then came down dramatically in the following weeks below 2%. The site has been fallow since week commencing 12/01/2026.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	Started 11/03/2026
Local Assessment time:	15:38

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	04/12/2025	Referral	☐
Time call / email received :	10:05	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	Unknown
Previous APHA reference (incl. FSA referrals):	NA

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)

3X WF77s generated from same email.

Dear APHA,

I'm afraid its me again, but I cant stop raising these fish health issues until I see that something is being done to address them. The figures for Loch Duart this month are appalling, this is ongoing.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

[redacted]

Loch a Chairn Bhain 20.3% of fish (90'000 fish in one week at the end of October)
Bad Caul 13.2% of fish which is 40'000 fish
Gob na Hoe - 45.2% of fish, a whopping half a million fish dead

These deaths are attributed to 'gill health, jellyfish and plankton', none of these issues can be avoided in open net salmon farming, and all are getting worse as water temperatures go up. These fish also have high sea lice numbers which impacts wild fish. I believe fish are covered in the animal health and welfare act 2006 so is there anything you can do to enforce better living conditions for fish, or shutting down sites that have persistently high mortalities?

I hope that you can help in some way, I'm so fed up with fish being treated as if they are less worthy of care than terrestrial farmed animals.

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 A Chairn Bhain
Site ID: [redacted]

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:

NA

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:	NA
Telephone number 2:	NA
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):	Loch Duart PLC Floor 3 1 West Regent Street, Glasgow, Scotland, G2 1RW Loch Duart PLC Badcall Salmon House Scourie, Sutherland IV27 4TH, SCOTLAND admin@lochduart.com
Likely CPH:	NA
Telephone number 1:	[redacted]
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	NA
(S & W only) SBI/CRN/BRN	NA
(S & W only) On current XC selection? (Yes / No)	NA
Last Sam welfare inspection date (N/A if not applicable):	Unknown
Ongoing Complex case? (Yes / No)	Unknown
Sensitive case? (Yes / No)	Unknown
Listed on Hazard Database? (Yes / No)	Unknown

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))

Risk assessed as medium due to high numbers of mortalities, 20.3% of fish (90'000 fish in one week at the end of October) as per complaint.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	11/12/2025

Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	04/12/2025
VRA Time:	15:59

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Y
Amended owner/keeper name and address (include postcode):	Amended CPH: n/a
Loch a Chairn Bhain [redacted]	Telephone number 1:
	Telephone number 2:
	(S & W only) Active XC claimant? (Yes / No): N/A
	(S & W only)SBI/CRN/BRN from CSC database: N/A
	(S & W only) On current XC selection? (Yes / No): N/A
	Last Sam welfare inspection date (N/A if not applicable): N/K
	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 [redacted]@apha.gov.uk and [redacted]@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).

This is a retrospective assessment, and it is restricted to Loch a Chairn Bhain [redacted]). I do not have local knowledge about this specific complaint, so I have looked into publicly available data and contacted the company. In summary, the complainant reports mortality of 20.3% of fish (90'000 salmon in one week) at the end of October. The complainant seems to be reading publicly available data and notes that the mortality would be attributed to 'gill health, jellyfish and plankton'. The latter concern the complainant because “none of these issues can be avoided in open net salmon farming”. The complaint has also concerns about unspecified high lice levels which she notes would affect wild salmon. It is noteworthy that wild salmond are out with the Animal & Plant Health Agency remit.
I contacted the company to find out more. The company’s [redacted], [redacted], reported the below:
Mortality: October 0.39% (40), 3.29% (41); 3.125% (42); 4.87% (43); 13% (44).
November 10.9% (45); 9.71% (46); 2.95%; (47) 1.23% (48); 0.66% (49) 0.28% (50) 0.82% (51); 0.62% (52).
Sea lice: October: 1.88 f/g (40), n/a (41); 3.36 f/g (42); 3.81f/g (43); 8.54 f/g (44);
November: 8.8 f/g (45); 2.78 (46); 5.06 (47); 5.69 f/g (48); 3.79 f/g (49); 3.99 f/g (50); 4.15 (51); 1.71 (52); subsequent weeks up to March 2026 below 2%.
Cause of mortality: severe AGD infection coupled with environmental damage so there is an explanation for the high mortality levels.
COMPANY’S ACTIONS: treatments were started gently; Salmosan in week 41 and 42. Freshwater treatment was done in November and freshwater plus FLS in week 49.
The diet also was also changed to improve skin health and this dietary change was reported to have worked well. A vet visited the site on 16/10/2025 (week 43). The vet found gill disease and recommended freshwater treatment and FLS. Due to the weather and limited resources the fresh water treatment could start on week 46 as the vessel to administer treatment had been prioritised by the company to another site. The company confirmed that any moribund fish at Loch Chairn Bain was culled on welfare grounds. The number of staff present on site was doubled to remove compromised fish. Moreover, extra equipment was pulled in to remove mortality more efficiently. The mortality in 2026 always under 2% and last week it was 0.15%. It is noteworthy that FHI had attended and served a notice for sea lice. The company advised me that FHI closed this lice incident since 14/01/2026.
In future to avoid potential delays with treatments the site has produced a sea lice plan approved by FHI. This plan includes the vessel [redacted] to be chartered full time to the company. This so that treatment can be started as soon as needed. The company advised that they are also going to implement more frequent testing as routine.
At the time this assessment is carried out, the mortality levels are low: 0.15% (week 11 of the cycle). Fish are reported to be growing well. The company reported that they have had the vet out last week. Therefore, no further action for APHA.

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

N/A

Name of LA:

Highland Council

Name of LA contact:

N/A

Local Assessment inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☐
1B - High (FSA/FSS) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☒

1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) Delayed for up to eight weeks ☐	5 - Insufficient information No inspection ☐

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

Mortality happened and it was explained by disease. Sea lice also peaked and FHI, under their remit, had served a notice to the company. The company's action included: treatments, a vet visited the site and gave advice. The diet of the fish was changed which benefited the fish. Staff on site were doubled to remove compromised fish promptly. FHI have monitored the situation and have closed the sea lice incident since 14/01/2026. The company have invested in terms of vessel capacity. The fish health manager reported that they have now a full-time chartered vessel to do treatments. They explained that this chartered vessel will give them more capacity should they have issues simultaneously at more than one site.
Finally, at the time of this assessment, week 11 of 2026, the mortality was 0.15% and the company reported that the fish are growing well and that they had the vet on site. Therefore, no action for APHA.

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

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):

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

Role (N/A if not applicable):

Veterinarian completing Local Assessment: [redacted]

Staff number: [redacted]

Local Assessment date: 20/03/2026

Local Assessment time: 10:41

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	08-09-25	Referral	☐
Time call / email received :	16:15	Origin:	Informant

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	no
Previously reported (Yes / No)	Don't know
Previous APHA reference (incl. FSA referrals):	Don't know

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)

Informant has called us to say that [redacted] is concerned re 2 Mowi Salmon Farm sites. The first site is Loch Leven, near Onich, Glen Coe.
[redacted] is reading information from the FHI website which states that this site was populated in the spring.
It is no now reporting a mortality of 1.7% in May, 5.3% in June, 7.9% in July.

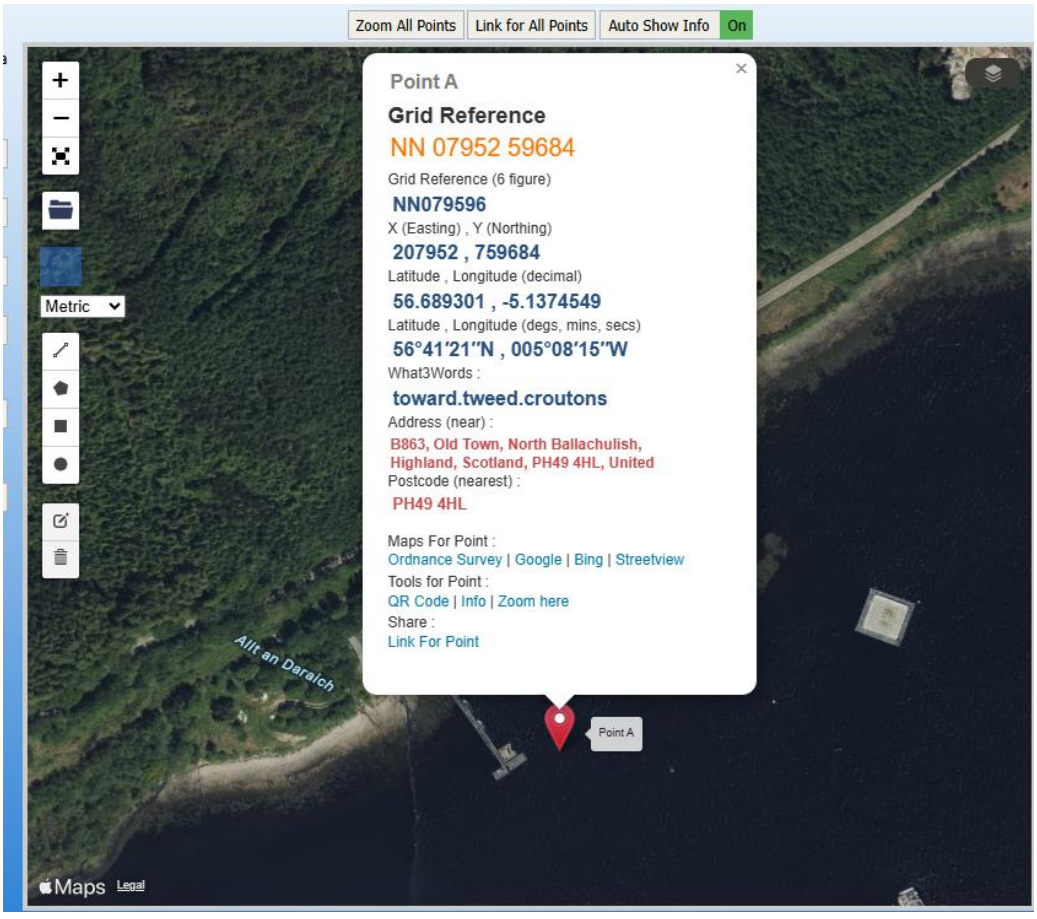
Welfare Category:

Farm	☐
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

[redacted] states that the site is an organic site and that mortalities have been attributed to bath treatment for sea lice and physical damage.
[redacted] is also concerned regarding the cleaner fish at the site, lumpfish and wrasse. [redacted] is not sure whether they are used on this site or not.
[redacted] states that FHI report they are monitoring the situation.
Mowi are to move the fish to a site called Ardesshy A & B. [redacted] sates that [redacted] is aware that these sites have already experienced high numbers of Jelly fish and plankton bloom already this year.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)



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:

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:	n/a
Email:	n/a

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Mowi Scotland
Loch Leven Site

Likely CPH:	[redacted]
Telephone number 1:	[redacted]
Telephone number 2:	n/a
(Scotland & Wales only) Active XC claimant? (Yes / No)	no
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	no
Last Sam welfare inspection date (N/A if not applicable):	Not recorded
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	?

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))

Member of public reporting data published by the Fish Health Inspectorate. This data has been provided to FHI by Mowi. Complainant has no first hand experience of the site.
Quite rightly [redacted] is concerned at the rising mortality rate at this facility.
Based on the figures in isolation this concern is justified as it would be above the expected mortality rate and there is a rising trend.
For this reason I believe an investigation is required into the welfare of the fish at this site.
I risk assess this as Low – within 14 days subject to local assessment.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒

1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	22/09/25
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	n/a
VRA Date:	08-09-25
VRA Time:	16:50

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	No, as incomplete
Amended owner/keeper name and address (include postcode):	
Amended CPH:	N/A Site identifiers: [redacted] and [redacted] (Ardessie)

COMPLETE ADDRESS

Mowi Scotland Ltd ([redacted])
Loch Leven (1)
Callert
Onich, Fort William
Inverness-shire
PH33 6SA

Mowi Scotland Ltd
Ardessie
Dundonnell,
By Garve
Ross-shire
IV23 2QU

Telephone number 1:	N/K
Telephone number 2:	N/K
(S & W only) Active XC claimant? (Yes / No)	N/A
(S & W only)SBI/CRN/BRN from CSC database:	
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	N/K
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	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 [redacted]@apha.gov.uk and [redacted]@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).

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

N/A

Name of LA:

Highland

Name of LA contact:

N/A

Local Assessment inspection requirement: (select one option only)

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

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

I have no local knowledge of this incident.
I have contacted [redacted] of FHI to get more info as the informant refers to a report allegedly by FHI. I have passed to [redacted] the complaint so that FHI can assess it under their remit. Please see below the data supporting a different VRA, namely no inspection.

JUSTIFICATION FOR A DIFFERENT VRA

Loch Leven 1[redacted])

After reading publicly available data, the complainant is concerned about mortality of 1.7% in May, 5.3% in June, 7.9% in July at this site. [redacted] states that the site is an organic site and that mortalities have been attributed to bath treatment for sea lice and physical damage. [redacted] is also concerned regarding the cleaner fish at the site, lumpfish and wrasse but [redacted] did not qualify his concerns at all. In fact, [redacted] is not sure whether cleaner fish are present on this site or not. This complaint was passed to the Fish Health Inspectorate for their consideration.
It is noteworthy that the mortality data reported by the complainant seem to mix two publicly available sets of data: Salmon Scotland monthly mortality website and Fish Health Inspectorate's (hereafter FHI) mortality events spreadsheet. FHI, is a statutory body under Scottish Government, confirmed to

me that their data cannot be compared directly to Salmon Scotland' due to the different way they are gathered. Therefore, in order to observe/compare the mortality levels consistently over weeks I have only used data published on FHI's website from June 23rd to August the 3rd and sought yet unpublished data directly from Mowi's senior management for the period August the 4th to September 7th. This date marks the end of this assessment. See the Appendix below for mortality details.

Background

This is a salmon broodstock site with maturing fish (13Kg average weight currently). It is noteworthy that broodstock sites have considerably less fish (a smaller population) than sites where fish are grown (bigger population). Therefore, it must be noted that mortalities at broodstock sites, if expressed as percentage only can appear disproportionately high due to small population onsite; a small population is mathematically a small denominator.
The company confirmed to me that there are not lumpsucker as they stopped their production and deployment this year. Wrasse are present but the complainant made no allegations on wrasse. Wrasse have been deployed on site to control sea lice and avoid the use of non-medicinal treatments; however given the size of fish and sea lice challenge, they could not control sea lice fully and the thermolicer treatment had to be done.
The complainant had concerns about mortality, so I have retrospectively asked the company senior management to provide me with mortality data up to the time of writing; I also asked what actions were taken to deal with mortality over the period June to September 7th 2025.

Mortality

There has been mortality over June to September 7th (see Appendix) with the highest value of 3.65% (1904 fish) in the week commencing on June 30th and finishing with a mortality of 2.74% (1197) at the end of the period observed. The company provided me with a summary of the root cause/s of mortality week by week.

Root cause/s of the mortality week by week

Senior management were able to advise on multiple causes of mortality. They confirmed that sea lice treatment was done on 28th and 29th July (all pens) with thermolicer; the company reported that this was a contributing cause of mortality in weeks 32 and 33 of the cycle. Sea lice treatment was also done on August 23rd and August the 30th with thermolicer; the latter was a contributing cause of mortality in weeks 35 and 36. Senior management reported other causes of mortality: cardiomyopathy (CMS); low prevalence of bacteria has been found in morts (furunculosis and yersinia) however these are secondary infections. Also, gill damage (PGD) has been increasing from the start of August most likely in relation to net cleaning as plankton counts remained below threshold. The company confirmed that fish on site are much larger than production fish (13Kg average weight currently) and 10-20% are maturing and the latter also explains mortality. Thus, the mortality has been caused by several factors and at its peak it caused the death of 1904 fish (3.65%).

Company's actions to deal with mortality

Senior management confirmed what actions the company took to look after the fish. These actions included: the [redacted] and the vet visited the site weekly with health assessments done and also attended the sea lice treatments. Samples were taken and PCR testing were done at least once per month including on 23rd July and 27th August 2025. The company's [redacted] was involved and [redacted] ([redacted]) visited the site monthly to assess population health and behaviour.

Company's next steps

Fish will be graded before the end of September, to select hens for egg production this year. The fish which are selected will be transferred to freshwater. The remaining fish will be transferred to the seawater broodstock site Ardessie, between mid-October and mid-November, when water conditions are safe.

Conclusion

This was a generic complaint on the back of the complainant reading two sets of publicly available data; The concerns were for mortality caused by treatment and an unqualified concern for lumpfish and wrasse but the complainant did not know if lumpfish or wrasse were present on site or not. The company confirmed that lumpfish were not at this site. Wrasse however were present but no specific concerns were raised. Therefore, this assessment was focussed on salmon mortality. The mortality levels over several weeks were looked at, the peak of which was 3.65% (1,904 fish). The company was able to assign mortality to specific causes on top of fish maturation and treatments losses; that was possible because they carried out laboratory tests to find out. The [redacted] including the [redacted] and the [redacted] were involved at this site to supervise the actions of the site staff.

It is therefore concluded that a site visit from APHA is not required.

ARDESSIE ([redacted])

Background

After reading publicly available data, the complainant contacted APHA because he has one concern, namely that MOWI are planning to move fish to this site; Ardessie has experienced high numbers of Jelly fish and plankton bloom previously. Waterborne jelly fish and plankton are known for their potential to seriously harm fish.This complaint was passed to the Fish Health Inspectorate for their consideration.

Ardessie is a seawater salmon broodstock site. Salmon were large (20-25 Kg average weight). Senior management have confirmed that there are not lumpfish on this site, but wrasse had been deployed on site.

Following the complaint, I have retrospectively contacted the company's senior management to find out about this site and if there were any other grounds of concern. Whilst the complainant did not raise concerns about mortality, I have assessed the mortality on site to get a picture of the overall situation on site.

There has been mortality (see Appendix below) at this site over the period July 2025 to August the 17th when all the salmons were moved off this site. A relatively small number of fish has died even if the mortality, expressed only as %, is inflated by the fact that the small population on site constitutes mathematically a small denominator. This is different to a growing site where, due to large populations, the denominator is mathematically a big number. During the observed period, the peak of mortality was recorded on week 31, 19.25% (1710 fish). It is noteworthy that as of week 33 the mortality had significantly dropped to 2.52% (82 fish). Week 33 was the last week the site was stocked with salmon and marks the end of this assessment. I have asked the company to explain the mortality week by week and what they did about it and their plans. (see below).

Root cause/s of the mortality week by week

Mowi's [redacted] has confirmed that mortality was caused by more than one agent. The main causes of mortality were gill damage (complex gill disease and Proliferative Gill damage) due to plankton on site; Cardiomyopathy syndrome, a viral disease of salmon and Heart and Skeletal Muscle Inflammation, a viral disease of salmon were also contributing factors to mortality. Fish maturation

was another cause of mortality as this generation was fully maturing this year. Fish were very large (20-25 Kg average weight).

Company's actions to deal with the incident

The company have advised that the [redacted] was on site weekly to assess fish mortality and the health status of fish. Multiple samples were taken on 9th July, 21stJuly, 28thJuly, 6th August and tested by PCR for all pathogens. Also, the [redacted] were involved including several health biologists and a vet in order to supervise the actions of the local site staff.

Next steps

All selected fish have been transferred to freshwater. The site was fallowed since the 16th August 2025.

Fallowing time

The site is already empty since 16th August.

Restocking

The company advised that Ardessie will be stocked with brood fish from Leven in mid-October to mid-November, depending on water conditions.
The company confirmed that Ardessie, like other sites on the west coast, can be impacted by plankton especially in August and September. The company advised that on the back of this, they monitor plankton levels daily. When blooms are detected, the company can mitigate their impact through feed withdrawals. The company confirmed that their new land based broodstock facilities are almost completed and expected to be fully operational in October; this means that the next generation of fish, by going to land based broodstock tanks in May, will be secured from waterborne blooms due to their land location. In addition, the company have advised that they are equipping the pens in the water with plantkon mitigations like bubble curtains; the latter with a view to prevent blooms from entering pens; freshwater lensing is used to mitigate against gill infections.

Conclusion

The complainant only concern was that MOWI were planning to move fish to Ardessie because it has already experienced high numbers of Jelly fish and plankton bloom. The latter can harm fish. When I retrospectively contacted MOWI, the company have confirmed that Ardessie is empty at present and the company's [redacted] has confirmed that they have a strategy to deal with blooms. The strategy includes a broodstock land based facility, expected to be ready in October, that won't be affected by blooms due to its location. The company daily monitors plankton and jellyfish so that they can adjust feeding if they detect them. They are also equipping the site with bubble curtains with a view to prevent blooms from entering pens located in the water. As regards mortality, which was not a concern to the complainant, the company have reacted satisfactorily by involving the local staff supervised by the biology team including their vet.
Therefore, an APHA visit is not warranted at this site.

APPENDIX

Mortality: Lock Leven 1

02/06/2025-08/06/2025 0.51 % (282 fish)
09/06/2025- 15/06/2025 0.66 % (364 fish)
16/06/2025-22/06/2025 0.73 % (400 fish)
23/06/2025-29/06/2025, 3.36% (1,818 fish)
30/06/2025-06/07/2025, 3.65% (1,904 fish)
21/07/2025-27/07/2025, 1.26% (618 fish)
28/07/2025-03/08/2025, 2.11% (1,018 fish)
04/08/2025-10/08/2025 0.94% (440 fish)
11/08/2025-17/08/2025, 0.96% (441 fish)
18/08/2025-24/08/2025, 1.81% (824 fish)
25/08/2025-31/08/2025, 0.99% (437 fish)
1/09/2025-07/09/2025, 2.74% (1197 fish)

Mortality: Ardessie

21/07/2025-27/07/2025 (week 30): 15.03% (1844 fish) only 12,268 fish left on site on 21/07
28/07/2025-03/08/2025 (week 31): 19.25% (1710 fish) only 8882 fish left on site on 28/07
04/08/2025-10/08/2025 (week 32): 1.24% (61 fish) only 4910 fish left on site on 04/08
11/08/2025-17/08/2025 (week 33): 2.52% (82 fish) only 3235 fish left on site on 11/08
No fish on site after week 33- fish was moved off.

END.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	started on 09/09/2025
Local Assessment time:	16:22

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	1/9/25	Referral	☐
Time call / email received :	9 am	Origin:	Informant

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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

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)

[Redacted video link and text]

Scalpay is operated by Mowi. Footage gathered on 2 August 2025

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Complaint reports salmon with wounds (17 seconds, 38 seconds, 2 minutes 9 seconds) and lice infestations (32 seconds). a wounded lumpfish ('cleanerfish') (58 seconds).

Footage from the same site declared as gathered on 13 August 2025 shows a substantial number of dead wrasse ('cleanerfish') floating on the pen's surface (3 minutes 15 seconds, 7 minutes 55 seconds). Salmon are also shown with wounds (5 minutes 38 seconds, 6 minutes 51 seconds, 7 minutes 30 seconds, 8 minutes 31 seconds), lice infestations (4 minutes 59 seconds) and facial disfigurement (4 minutes 2 seconds).

Full email: 2025 08 29 Letter from [redacted] to APHA re

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Scalpay, Caol Mhor, Maol Ban Sconser IV48 8TD.

APHA Delivery Team for this location:

Scotland - Perth

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

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:	N/K
Email:	[redacted]

Veterinary Risk Assessment (VRA)

Complaint reports salmon with wounds (17 seconds, 38 seconds, 2 minutes 9 seconds) and lice infestations (32 seconds). a wounded lumpfish ('cleanerfish') (58 seconds).

Footage from the same site declared as gathered on 13 August 2025 shows a substantial number of dead wrasse ('cleanerfish') floating on the pen's surface (3 minutes 15 seconds, 7 minutes 55 seconds). Salmon are also shown with wounds (5 minutes 38 seconds, 6 minutes 51 seconds, 7 minutes 30 seconds, 8 minutes 31 seconds), lice infestations (4 minutes 59 seconds) and facial disfigurement (4 minutes 2 seconds).

Full email: 2025 08 29 Letter from [redacted] to APHA re

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Scalpay, Caol Mhor, Maol Ban Sconser IV48 8TD.

APHA Delivery Team for this location:

Scotland - Perth

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

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:	N/K
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):	
Scalpay. Caol Mhor, Maol Ban Sconser IV48 8TD.	Likely CPH:
	Telephone number 1:
	Telephone number 2:
	(Scotland & Wales only) Active XC claimant? (Yes / No)
	(S & W only) SBI/CRN/BRN
	(S & W only) On current XC selection? (Yes / No)
	Last Sam welfare inspection date (N/A if not applicable):
	Ongoing Complex case? (Yes / No)
	Sensitive case? (Yes / No)
	Listed on Hazard Database? (Yes / No)

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))

The footage reveals farmed Salmon in seawater pen. Location to be confirmed as most underwater filming, with unknown numbers of fish in the pen.

Salmon with open and different stage of healed wounds are recorded in the footage, including salmons with unacceptable level of sea lice attached to the fish.

Duty of care of cleaner fish also should be investigated during the visit to assess cause of mortality and action for wrasse and cleaner fish in general

Visit is required to investigate if the footage shows a generalised condition across the farm, and what action are in place on farm when/if member of the staff able to detect excess of sea lice or wounded animals like the one in the footage. Is an appropriate welfare action plan in place and is this implemented?

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	15/09/25
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	1/9/25
VRA Time:	9.40 pm

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
Amended owner/keeper name and address (include postcode): [redacted]	Amended CPH: N/A to fish farms
	Telephone number 1: n/k
	Telephone number 2: n/k
	(S & W only) Active XC claimant? (Yes / No) N/A to fish farms
	(S & W only)SBI/CRN/BRN from CSC database: n/k
	(S & W only) On current XC selection? (Yes / No) N/A
	Last Sam welfare inspection date (N/A if not applicable):
	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 [redacted]@apha.gov.uk and [redacted]@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).

I do not have local knowledge of this incident. I have contacted [redacted], of Marine Scotland, and passed on the complaint to them so that they can assess it under their remit. Awaiting to hear from [redacted] if they plan to attend and if they have a site identifier. This is retrospective footage claimed to having been shot at Scalpay site on two separate dates; A remote assessment will be carried out.

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

I have informed the local authority of the allegations and footage so that they can assess it under their remit.

Name of LA:

Highland Council

Name of LA contact:

[redacted]

Local Assessment inspection requirement: (select one option only)

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

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

N/A

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

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): REMOTE ASSESSMENT

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

Role (N/A if not applicable): N/A

Veterinarian completing Local Assessment: [redacted]

Staff number:	[redacted]
Local Assessment date:	Started on 02/09/2025
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
- A[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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	23/03/2026	Referral	☐
Time call / email received :	09:32	Origin:	Informant

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	[redacted]
Previously reported (Yes / No)	Yes – unknown WS
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)

Letter received from [redacted] regarding footage obtained in “march 2026” showing “Salmon suffering from eye injuries, Salmon suffering from lice and Salmon with facial and skin wounds”

Video link:
[Redacted video link and text]

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant: [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.)

West Strome fish farm →[redacted]

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:

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:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost
West Strome Fish farm
Mid Strome
Lochcarron
Rosshire
IV54 8YH

Likely CPH:	Unknown
Telephone number 1:	[redacted]
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	No
(S & W only) SBI/CRN/BRN	
(S & W only) On current XC selection? (Yes / No)	No
Last Sam welfare inspection date (N/A if not applicable):	N/A
Ongoing Complex case? (Yes / No)	No
Sensitive case? (Yes / No)	No

Listed on Hazard Database? (Yes / No)	No

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))

Video attached is three minutes and thirty seven seconds long: during the video approx. 5-10 individuals (difficult to pinpoint exact individuals due to videos nature of cutting between views) could be picked out of the video with extensive sea lice, potential dropsy, significant scale loss and ocular damage (multiple to the extent the eye was presenting as an open socket). Video appears to be taken in the daytime on March 2026- no date was listed on the video and no evidence of the date was provided during the video. Exact geographical location could also not be ascertained from the video itself (letter refers to West Strome fish farm and Finuary)- but it is of note that all individuals picked out were swimming near the top of the tank.

High VRA – urgent (within 24 hours)- 1C due to degree of current farm animal suffering alleged as per ops manual guidance. However due to the animal activist nature (with repeated complaints regarding West Strome) of this complaint, a local VRA assessment is required with local knowledge of the site.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☒	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	24/03/2026
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	No
VRA Date:	23/03/2026
VRA Time:	11:45

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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

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

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):

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

Role (N/A if not applicable):

Veterinarian completing Local Assessment:

Staff number:

Local Assessment date:

Local Assessment time:

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	29/04/2025	Referral	☒
Time call / email received :	15:40	Origin:	Private Vet

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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	n/a
Previously reported (Yes / No)	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)

[redacted] increased mortality from smolt / post-smolt units at Applecross.

All smolt / ongrowing smolt have already been transferred to sea and the affected units are empty.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

One of the post-smolt units experienced an issue with a biofilter which led to transfer of all ongrowing smolt to sea. The screen of the biofilter, which holds thefilter in place, was not fixed securely enough to prevent loosening with increase of biofilter media. Subsequently the biofilter could not be brought online effectively, leading to increase in ammionia. The system was switched to flow-through which led to issues with regulation of salt content and fungal infection. 3 populations in this unit affected.

Unit AP5 received new pipelines and biofilters, arriving fish showed some mechanical abrasions after flowing through pipeline and also fungal infection.
Fish transferred to sea – following transfer approx. 20% mortality at sea – however this mortality is still accounted to the fresh-water site as immediately following transfer.

Other populations transferred to sea from new unit also approx. 20% mortality, even though no issues noted at freshwater site. Noted vestibular syndrome with side-swimming on arrival at sea.

Bakkafrost are currently investigating why even the healthy populations which were transferred experienced high transfer mortality. Exact numbers of morts not know at time of phone call.

Possible issue with one of the pumps (pump speed?) at transfer. Internal investigation pending. The whole transfer process was closely monitored and observed as this is a new unit. The fish did not show any scale damage throughout, however when entering transfer vessel appeared agitated.

To note: ALL units at freshwater site which held the affected populations are currently fallow.

[redacted]

[redacted]

[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.)

Applecross Hatchery for the Scottish Salmon Company (Bakka Frost)

APHA Delivery Team for this location:

Scotland - Inverness

Kishorn

Ross Shire

IV54 8X

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

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:	
Telephone number 2:	
Email:	

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Applecross Hatchery for the Scottish Salmon Company (Bakka Frost)
Kishorn
Ross Shire
IV54 8X

Likely CPH:	
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	no
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	no
Last Sam welfare inspection date (N/A if not applicable):	November 2024
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	yes
Listed on Hazard Database? (Yes / No)	no

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))

All affected units are de-populated.
Internal Bakkafrost investigation pending.
[redacted] reported this issue to APHA.

APHA are due a routine inspection to the site in JUNE 2025 and this matter can be addressed at the planned inspection. There is no relevant tick box in the VRA requirement below – require a "delayed to next cycle or next routine inspection" box 😊

Case vet to liaise with FHI and LA for further external information please.

VRA inspection requirement: (select one option only)

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

(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):	JUNE 2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	n/a
VRA Date:	29/04/2025
VRA Time:	17:00

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):	

	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 [redacted]@apha.gov.uk and [redacted]@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).

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable):	
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):	
Name of APHA representative attending (N/A if not applicable):	
Role (N/A if not applicable):	
Veterinarian completing Local Assessment:	
Staff number:	
Local Assessment date:	
Local Assessment time:	

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type:	Complaint	☐
Date:	25/06/2025		Referral	☒
Time call / email received :	08.28		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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	
Previously reported (Yes / No)	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)

Please see Applecross update for week 24 –

Applecross Smolt Unit treatment	FS0500	10.09%	160,150	Antibiotic

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Bakkafrost Applecross site at Kishorn

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:

Fish health inspectorate mortality figures

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:	
Email:	

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Applecross [redacted]
Applecross Hatchery
Kishorn
Highland
IV54 8XF

Likely CPH:	n/a
Telephone number 1:	n/a
Telephone number 2:	n/a
(Scotland & Wales only) Active XC claimant? (Yes / No)	n/a
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	n/a
Last Sam welfare inspection date (N/A if not applicable):	Nov 024
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Monitor remotely meantime as fish already being treated with antibiotics, mortalities expected to continue to rise next week at least. FHI monitoring but mortality for wk 25 is 36.6%. Antibiotic started 19/06. Discuss with management, and visit within next month. FHI- 33g size fish, bacterial disease diagnosed.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	09/07/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	30/06/2025
VRA Time:	11:30

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:
As above	Telephone number 1:
	Telephone number 2:
	(S & W only) Active XC claimant? (Yes / No) N/a
	(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):

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 [redacted]@apha.gov.uk and [redacted]@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).

See below, this is disease issue being monitored by FHI, no further action by APHA

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

25/06 Teams meeting with FHI. These fish have fungus disease, that has been treated with salt treatments, altered salinity level and enhanced moribund removal. There were then smoltification issues and bacterial disease due to salinity treatments, 24 hr daylight and possibly other factors as well. Antibiotic treatment started 19/06

Name of LA: FHI

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Disease issue not welfare primarily.

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):	FHI
Name of APHA representative attending (N/A if not applicable):	n/a
Role (N/A if not applicable):	n/a
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	01/07/2025
Local Assessment time:	10:15

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:	

Low
Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	1/09/25	Referral	☒
Time call / email received :	29/08/25	Origin:	Other Third Party

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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

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 received on Friday 29/08/25 at 16:59. Please note DEFRA mail system was experiencing issues on that day and DV aware of the email only on Monday 1/09/25.

Content of email relevant to this farm below:

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Quarry Point: [Redacted video link and text]

Quarry Point operated by Bakkafrost. Footage gathered on 3 and 4 May 2025

shows salmon being lifted from the sea pen and loaded into a 'mort bin' container. Some of the salmon are still alive and left to suffocate to death, with the container closed by workers while one fish is still thrashing (1 minute 23 seconds, 2 minutes 33 seconds, 3 minutes, 3 minutes 9 seconds, 3 minutes 52 seconds).

Full email: 2025 08 29 Letter from [redacted] to APHA re

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Moorings - Quarry Point, Loch Fyne - 00011113
https://marine.gov.scot/sites/default/files/annex_one_00011113.pdf

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:

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Scotland
28 Drumsheugh Gardens

Likely CPH: N/A

Telephone number 1: [redacted]

Telephone number 2: N/A

Edinburgh EH3 7RN	
(Scotland & Wales only) Active XC claimant? (Yes / No)	N/A
(S & W only) SBI/CRN/BRN	N/A
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	Unknown
Ongoing Complex case? (Yes / No)	Ongoing case
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

. The video and the description seems referring to collection of ABP/mortality, where still mouribound/still alive fisj were seen.
SG guidance for Welfare of Farmed Fish at the Time of Slaughter cover also time of killing, and training for operators is core of it.

The guidance covers all slaughter and killing operations related to salmon farming, including preparation for slaughter, transport, and slaughter of salmon for human consumption, as well as euthanasia or culling of salmon and other species of fish, relevant to salmon farming.

While seems the staff task is to collect mortality and it's handling and transporting as ABP, movement can be seen: mouribund fish do require assessment and duty of care action should be taken.

SG guidance :

A. Training and Competence Slaughter, euthanasia or culling operations include functions such as crowding, transfer, grading, handling, stunning and killing. All personnel involved in slaughter operations and/or the killing of salmon should be suitably trained (with records maintained and available for inspection), competent and aware of their duty of care. All slaughter or killing and related operations should be overseen by a designated trained, competent and suitable person who has overall control and responsibility for fish welfare. Personnel involved in slaughter, euthanasia or culling operations should be able to recognise farmed fish density and stress responses, so that this can be balanced with efficiency of fish capture/treatment and duration of crowding, prior to slaughter or killing.

D. All Killing Farmed fish, cleaner fish cohabiting with salmon, and incidentally caught species within the farm pen, should only be killed by a humane method specified at Annex A. Farmed fish, cleaner fish and incidentally caught species must not under any circumstances be killed by inhumane methods, including in particular: i. bleeding (exsanguination) by gill cutting or other means without

prior stunning ii. asphyxia in air iii. evisceration or decapitation iv. live chilling (fast or slow) v. ice slurry or bath vi. carbon dioxide narcosis

[redacted] recommendation: Please visit the farm. Please make sure staff is adequately trained to recognise correct and timely intervention to preserve animal welfare, and if killing is measure to adopt, this is carried out according to the SG guidance.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	14/09/25
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	1/09/25
VRA Time:	13.00

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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

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

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):

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

Role (N/A if not applicable):

Veterinarian completing Local Assessment:

Staff number:

Local Assessment date:

Local Assessment time:

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	18/09/2025	Referral	☒
Time call / email received :	16:55	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	N/A
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)

[redacted] reported high fish mortality at:
“ Inverkerry Smolt Unit ([redacted]) operated by Landcatch Natural Selection has reported further mortalities. We advised you about a previous report due to furunculosis but this has resolved and there is now a different issue related to environmental challenge and bacterial gill disease. Over the last two weeks they have had a total of 646,259 mortalities (11.72% and 11.97% weekly). They initially treated with

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Pyceze but switched to Chloramine-T which has proven effective with mortality dropping significantly since Friday. They also reported that appetite in the surviving stock has noticeably improved. We had an inspector on site today and they have taken diagnostic samples."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Updated 22/09/2025 by[redacted]:
Inverkerry, Gairloch, Ross-Shire, IV21 2AL
(By mouth of River Kerry / Loch Kerry)

APHA Delivery Team for this location: Inverness

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

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Landcatch Natural Selection

Updated 22/09/2025 by[redacted]:
Landcatch
Ormsary Fish FarmPA31 8PE
Ormsary, Lochgilphead, ArgyllScotland
T. +44 1880 770 720
E.[redacted]

Likely CPH:	[redacted]
Telephone number 1:	[redacted]
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	no
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	no
Last Sam welfare inspection date (N/A if not applicable):	n/a
Ongoing Complex case? (Yes / No)	no

Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	02/10/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	18/09/2025
VRA Time:	17:00

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	yes
Amended CPH:	
Telephone number 1:	
Telephone number 2:	
(S & W only) Active XC claimant? (Yes / No)	

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

(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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

FHI report mentions environmental challenge in addition to disease which may have resulted in mortalities, although treatment administered has led to improvements.
FHI inspector on site on day initial referral made (18/09/2025), pending further information.

Further information from FHI received 24th September:
During visit on 18/09/2025 approx 20 -30 moribund fish seen in mort tanks associated with the small 7g B tanks. Inspection of health reports: Gill pathology suggestive of sub-optimal environment and PCR positive salmon gill pox. Treatment with Chloramine T and Pyceze – improvement in appetite and reduction in mortality following change of treatment to Chloramine T. PCR results FHI samples = salmon gill pox virus positive – pending histo and bact results.

Update 29/09/2025: Mortality 22- 28/9/2025 = 2.94%. Attributed to Aeromonas salmonicida. Vet inspection & commencement of treatment with Oxytetracycline – this has changed from initial suspicion which attributed mortality to gill health / environmental issues. Histopath indicative of systemic bacterial infection resembling Aeromonas spp, minor gill pathology – pending gram stain.

Initial assessment attributed mortality to sub-optimal environment / gill health issues – this has now changed following more detailed investigation which suggests systemic bacterial infection. Immediate involvement of PVS and treatment as prescribed. Continued detailed investigation carried out by the company.

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

Joint visit with [redacted], [redacted] organised for 02 October 2025

Name of LA:

Highland Council

Name of LA contact:

[redacted]

Local Assessment inspection requirement: (select one option only)

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

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

Maintain VRA as low as disease rather than sub-optimal environment seems to be cause of mortality.

Date inspection required by (N/A if not applicable): 2/10/2025

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): APHA / Highland Council

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

Role (N/A if not applicable): [redacted]

Veterinarian completing Local Assessment: [redacted]

Staff number: [redacted]

Local Assessment date: 22/09 updated 29/9/2025

Local Assessment time: 18:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4711036

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:	[redacted]	Report type: Complaint	☐
Date:	18/09/2025	Referral	☒
Time call / email received :	16:50	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	N/A
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)

[redacted] reported high fish mortality:
" Tervine [redacted]) operated by Dawnfresh Farming (now owned by Mowi Scotland) reported a 7.22% (134,491 fish) mortality for w/c 25/08/25 attributed to fungus. Formalin/bronopol treatments have been performed and mortality has been decreasing although still higher than normal (as at 05/09). More treatments are on-going. Diagnostic detected IPN but this was thought to be from the vaccination prior to transfer to

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

the site. We were able to get an inspector on site on 11 September and they took diagnostic samples – results outstanding."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Tervine, Kilchrenan
Taynult
Argyll
PA35 1HE
South -East of Pwer Station in Loch Awe, Argyll

APHA Delivery Team for this location:

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

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Downfresh Farming own by Mowi Scotland

Updated 22/09/2025 by AB:

Mowi Scotland Ltd

[redacted]

Mowi Scotland Limited

[redacted]

Mobile: [redacted]

Likely CPH:	[redacted]
Telephone number 1:	[redacted]
Telephone number 2:	[redacted]
(Scotland & Wales only) Active XC claimant? (Yes / No)	no
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	no
Last Sam welfare inspection date (N/A if not applicable):	n/a
Ongoing Complex case? (Yes / No)	no

DDI: [redacted]
Mail: [redacted]

Office: Mowi
Farms Office
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Updated 22/09/2025 by [redacted]: This premises is in Argyll & Bute = Perth Office. Passed on to [redacted] Fungal infection – company has already instigated treatment and mortality is declining. FHI have attended site on 11th September 2025 and have not reported welfare non-compliance issues. Further results from FHI samples outstanding. Disease and not welfare issue = remit of FHI. Passed to local team (Perth) for consideration.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	02/10/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	18/09/2025
VRA Time:	16:50

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	YES
Amended owner/keeper name and address (include postcode):	Amended CPH:
Formerly Dawnfresh Farming Ltd Now Mowi Tervine, Kilchrenan Taynult Argyll PA35 1HE	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):
	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 [redacted]@apha.gov.uk and [redacted]@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).

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

n/a	

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

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

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 REMOTE INSPECTION
Name of APHA representative attending (N/A if not applicable):	[redacted]
Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	8/10/2025
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

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HM3 Stamp	Name:		Date Received:		WS ID:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	18/09/2025	Referral	☒
Time call / email received :	17:00	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	N/A
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)

[redacted] reported high fish mortality at:
"Laddie Wood, Loch Garry (FS1104) operated by Mowi Scotland reported a mortality of 12.81% (67,957 fish) for w/c 28/08/2025 due to furunculosis. The site treated with antibiotic (finished treatment 02/09) and mortality has decreased to below the reporting threshold. This report was missed by us at the time so by the time we contacted the

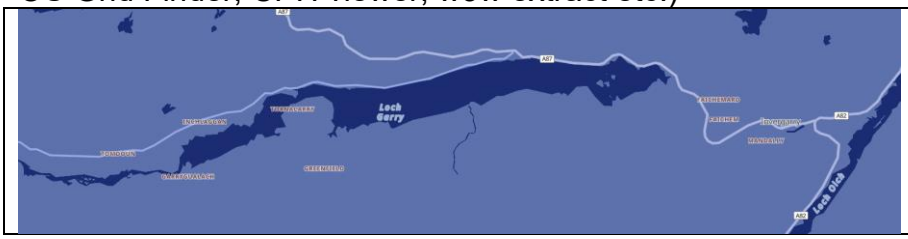
Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

company all was resolved. As it's resolved I wasn't sure whether to include but thought the numbers were worth passing on."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)



APHA Delivery Team for this location:

Inverness

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

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Mowi Scotland

Updated 22/09/2025 by [redacted]:

Mowi Scotland Ltd

[redacted]

Mowi Scotland Limited

Mobile: [redacted]

Likely CPH:	[redacted]
Telephone number 1:	Mobile: [redacted]
Telephone number 2:	DDI: [redacted]
(Scotland & Wales only) Active XC claimant? (Yes / No)	no
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	no
Last Sam welfare inspection date (N/A if not applicable):	n/a
Ongoing Complex case?	no

DDI: [redacted]
Mail: [redacted]

Office: Mowi
Farms Office
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

(Yes / No)

Sensitive case? (Yes / No) no

Listed on Hazard Database? (Yes / No) no

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))

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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): 02/09/2025

Veterinarian completing VRA: [redacted]

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

VRA Date: 18/09/2025

VRA Time: 17:05

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
Amended owner/keeper name and address (include postcode): All updated on 22/09/2025	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):
	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 [redacted]@apha.gov.uk and [redacted]@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).

Disease related mortality (furunculosis) – the company have instigated treatment which was effective – mortality has dropped below threshold levels. There is no indication that adverse welfare was the underlying factor for the mortality event. Disease events are remit of the FHI and as such this is not considered to fall under APHA remit.

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

Not discussed as disease only, not welfare issue.	Highland Council
	Name of LA contact: Gordon Carmichael

Local Assessment inspection requirement: (select one option only)

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

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

Disease (furunculosis) was underlying issue, not a welfare non-compliance.

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):	Fish Health Inspectorate
Name of APHA representative attending (N/A if not applicable):	N/A
Role (N/A if not applicable):	N/A
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	22/09/2025
Local Assessment time:	17:46

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4678198

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:	[redacted]	Report type: Complaint	☐
Date:	1/09/25	Referral	☒
Time call / email received :	29/08/25	Origin:	Other Third Party

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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

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 received on Friday 29/08/25 at 16:59. Please note DEFRA mail system was experiencing issues on that day and DV aware of the email only on Monday 1/09/25.

Content of email relevant to this farm below:

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

[Redacted video link and text]
Loch Snizort East Footage gathered on 1 May 2025

Loch Snizort East is operated by Loch Duart.

Footage shows an open sea pen, with fish being collected/pumped for slaughter onto a slaughter boat. . One fish is shown to escape from the process and gets on the boat's floor. The fish is first shown at 50 seconds, in distress, until a worker notice it and places them back into the machine at 1 minute 45 seconds. This distress has been reported in the allegation as asphyxia. No attempt to stun or kill the animal in situ noticed in the footage.

Full email: 2025 08 29 Letter from [redacted] to APHA re

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Address:
Shore Base Uig Skye
IV51 9XX

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:

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Loch duart limited:

Likely CPH: N/A

Telephone number 1:

[Redacted video link and text]
Loch Snizort East Footage gathered on 1 May 2025

Loch Snizort East is operated by Loch Duart.

Footage shows an open sea pen, with fish being collected/pumped for slaughter onto a slaughter boat. . One fish is shown to escape from the process and gets on the boat's floor. The fish is first shown at 50 seconds, in distress, until a worker notice it and places them back into the machine at 1 minute 45 seconds. This distress has been reported in the allegation as asphyxia. No attempt to stun or kill the animal in situ noticed in the footage.

Full email: 2025 08 29 Letter from [redacted] to APHA re

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Address:
Shore Base Uig Skye
IV51 9XX

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:

N/A

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: N/A

Email: [redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Loch duart limited:

Likely CPH: N/A

Telephone number 1:

Gremista Lerwick Shetland ZE1 0PX United Kingdom	
Telephone number 2:	N/A
(Scotland & Wales only) Active XC claimant? (Yes / No)	N/A
(S & W only) SBI/CRN/BRN	N/A
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	Unknown
Ongoing Complex case? (Yes / No)	Ongoing case
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

. The video and the description seems referring to slaughter process.

SG guidance for Welfare of Farmed Fish at the Time of Slaughter:

The guidance covers all slaughter and killing operations related to salmon farming, including preparation for slaughter, transport, and slaughter of salmon for human consumption, as well as euthanasia or culling of salmon and other species of fish, relevant to salmon farming.

SG guidance :

A. Training and Competence Slaughter, euthanasia or culling operations include functions such as crowding, transfer, grading, handling, stunning and killing. All personnel involved in slaughter operations and/or the killing of salmon should be suitably trained (with records maintained and available for inspection), competent and aware of their duty of care. All slaughter or killing and related operations should be overseen by a designated trained, competent and suitable person who has overall control and responsibility for fish welfare. Personnel involved in slaughter, euthanasia or culling operations should be able to recognise farmed fish density and stress responses, so that this can be balanced with efficiency of fish capture/treatment and duration of crowding, prior to slaughter or killing.

SVI comments: Welfare at time of Slaughter/killing should be investigated.

Please contact the farm and investigate :-

- staff should be adequately trained for intervention to preserve animal welfare at time of slaughter.

Please collect information regarding the catching team/ if this were contractor, including equipment used and its setting, and farm's animal welfare responsible for the farm to investigate .

Visit on farm maybe not required on same site, but on same contractor/staff /boat if different from site staff/rented equipment.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	14/09/25
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	1/09/25
VRA Time:	14.00

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:
Loch Snizort East Loch Duart salmon Ltd Uig	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):
	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 [redacted]@apha.gov.uk and [redacted]@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).

Discussion with [redacted], of Loch Duart, who is [redacted] at this site:
The recorded incident is contractors boat, that [redacted] himself inspects regularly. The fish was out of the water for 55 seconds due to a temporary overfill of the crowd pen after dewatering which can happen with a slight swell or another small increase in the number of fish entering the pipeline. The operative checked the fish and replaced it into the water as soon as possible, as is standard practice. As this is a harvest situation, and all possible mitigating steps are followed, and prompt action is seen on the video, no further action by APHA at this time. Regular harvest boat inspections are recommended for APHA to observe harvest in the future. A new harvest boat is being built and will be in operation soon.

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

n/a

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Remote inspection done on 24/09/2025. Harvest boat situation that was promptly dealt with to prevent any further suffering of the one fish this WF77 pertains to. No current suffering. No further action is required.

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):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	24/09/2025
Local Assessment time:	14:15

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	18/09/2025	Referral	☒
Time call / email received :	16:30	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	N/A
Previously reported (Yes / No)	Yes
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)

[redacted] reported high fish mortality at Backafrost in Portree: "Portree (FS0708) operated by Backafrost has reported increased mortality over recent weeks – w/c 18/08/25 - 2.95% (15,830 fish) and w/c 01/09/2025 – 8.5% (44,223 fish) attributed to gill health. Freshwater treatments have been carried out in weeks 34/35 with follow-up treatment planned for weeks 37/38. One of our inspectors ([redacted]) is visiting the site next week."

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

APHA Delivery Team for this location:

Inverness



Inserted 22/09/2025 by [redacted]

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

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost in Portree
Main office in Scotland: 28 Drumsheugh Gardens, Edinburgh, EH3 7RN

Likely CPH:	[redacted]
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	

Also Bakkafrost Scotland Ltd, Suite 3, Malin House European Marine Science Park, Dunbeg, PA37 1SZ Tel: +44 (0)131 718 8500 www.bakkafrostscotland.com shop.scottishsalmon.com	(S & W only) SBI/CRN/BRN
	(S & W only) On current XC selection? (Yes / No)
	Last Sam welfare inspection date (N/A if not applicable):
	Ongoing Complex case? (Yes / No): No
	Sensitive case? (Yes / No): No
	Listed on Hazard Database? (Yes / No): No

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))

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	02/10/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	18/09/2025
VRA Time:	16:35

Local Assessment - To be completed by the local field team

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

Amended owner/keeper name and address (include postcode):	[redacted] [redacted] Contact details correct in 2023 – unclear if the [redacted] remain the same. [redacted]
Amended CPH:	
Telephone number 1:	
Telephone number 2:	
(S & W only) Active XC claimant? (Yes / No)	no
(S & W only)SBI/CRN/BRN from CSC database:	n/a
(S & W only) On current XC selection? (Yes / No)	no
Last Sam welfare inspection date (N/A if not applicable):	25/09/2023
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	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 [redacted]@apha.gov.uk and [redacted]@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).

Adverse gill health is the underlying issue for the mortality. The company have already instigated fresh water treatment and another treatment is pending. The FHI is due to visit w/c 22/09/2025 and we have asked for an update following the inspection. This is a disease related mortality, there is no indication that welfare non-compliance has resulted in mortality. The historic inspection in 2023 was around the same time of year and disclosed no welfare non-compliance.

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

Not discussed as disease and not welfare related.

Name of LA: Highland Council

Name of LA contact:

	[redacted]

Local Assessment inspection requirement: (select one option only)

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

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

Disease related mortality falls under FHI remit – no indication of welfare non-compliance.

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):	Fish Health Inspectorate
Name of APHA representative attending (N/A if not applicable):	N/A
Role (N/A if not applicable):	N/A
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	22/09/2025
Local Assessment time:	17:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4699457

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:	[redacted]	Report type: Complaint	☒
Date:	25/7/2025	Referral	☐
Time call / email received :	13:19	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	No
Previous APHA reference (incl. FSA referrals):	NA

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)

"Please could you advise if you are aware of the extremely high mortality figures released by Salmon Scotland for May 2025 at the above three Bakkafrost farms.

I summarise below.

Quarry point. Site ID [redacted]

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

May 2025 mortality reported 7.5% (viral disease). Over the last 12 months the sum of monthly mortalities is now 35%.

Gob a Bharra. Site ID [redacted]
This has been in production for 7 months . Mortality in May 2025 was 5.2% and already total monthly mortality at this site is 15%

Geasgill. Site ID [redacted]
Mortality in May was 6%. Its been in production for 2 months and has lost 6.5% over this period."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

APHA Delivery Team for this location:

Scotland - Perth

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

NA

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:	
Telephone number 2:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Salmon Farm
(Quarry Point
Gob A Bharra
Geasgill)

Likely CPH:	
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	
(S & W only) SBI/CRN/BRN	

(S & W only) On current XC selection? (Yes / No)	
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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))

Higher mortality rates, a discussion regarding these sites increased rates should be had with the operator.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	8/8/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	No
VRA Date:	25/7/2025
VRA Time:	14:38

Local Assessment - To be completed by the local field team

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

Amended owner/keeper name and

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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

Remote meeting with company scheduled for 05/08/2025.

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable):	08/08/25
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):	APHA
Name of APHA representative attending (N/A if not applicable):	[redacted]
Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	28/07/2025
Local Assessment time:	16:07

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	18/09/2025	Referral	☒
Time call / email received :	17:10	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	N/A
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)

[redacted] reported high fish mortality at:
"Stulaigh ([redacted]) operated by Mowi Scotland in south Uist has had ongoing mortalities since the beginning of July. Percentages haven't been particularly high (mostly 1-2%) but have increased slightly over the last 3 reports. The latest reports we have are:

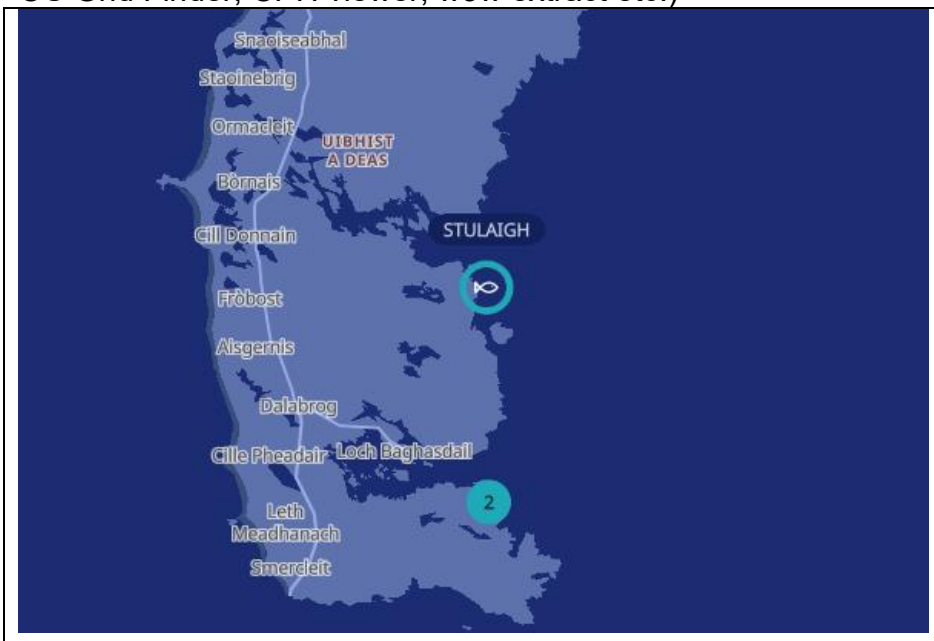
Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

w/c 11/08/25 – 2.21% (11,888 fish), w/c 18/08/25 – 3.88% (19,787 fish) and w/c 25/08/25 – 3.02% (13,976 fish). One of our inspectors [redacted]) is visiting the site next week."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)



Inserted 22/09/2025 by [redacted]

APHA Delivery Team for this location:

Inverness

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

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Likely CPH: [redacted]

Updated 22/09/2025 by [redacted]:

Telephone number 1: [redacted]

Telephone number 2: [redacted]

Mowi Scotland Ltd

[redacted]

Mowi Scotland Limited

Mobile: [redacted]
DDI: [redacted]
Mail: [redacted]

Office: Mowi
Farms Office
Stob Ban House
Glen Nevis Business Park
Fort William
PH33 6RX

(Scotland & Wales only) Active XC claimant? (Yes / No)	No
(S & W only) SBI/CRN/BRN	N/A
(S & W only) On current XC selection? (Yes / No)	No
Last Sam welfare inspection date (N/A if not applicable):	N/A
Ongoing Complex case? (Yes / No)	No
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	02/09/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	18/09/2025
VRA Time:	17:15

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
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):	N/A for this site
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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

Updated in 1st part 22/09/2025

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 [redacted]@apha.gov.uk and [redacted]@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).

Salmon Scotland publish monthly mortality data, last available report is for July 2025. Stulaigh reported cumulative monthly 5.5% mortality in July monthly-mortality-rate-july-2025 due to viral disease.
This is disease related mortality and as such, falls under the remit of the FHI.
FHI Inspector [redacted] is due to visit next week and I have asked [redacted] to update us with any information which would indicate that a welfare issue exists in addition to the disease issue which has been identified by the company. At present, no APHA inspection required.

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

Due to this being disease (and not welfare) related mortality, no discussion with LA

Name of LA:

CNE SIAR

Name of LA contact:

[redacted] / [redacted]

Local Assessment inspection requirement: (select one option only)

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

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

Disease related mortality – remit of FHI.
No indication that mortality occurred due to welfare non-compliance.

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): Fish Health Inspectorate

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

Role (N/A if not applicable): N/A

Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	22/09/2025
Local Assessment time:	16:54

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	18/09/2025	Referral	☒
Time call / email received :	16:40	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	N/A
Previously reported (Yes / No)	Yes
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)

Fish high mortality was reported by [redacted]:

"Outer Bay (Loch Droighniche) ([redacted]) operated by Loch Duart is a broodstock site with low numbers of mature fish stocked. They have had ongoing issues with seal predation since the spring and more recently are reporting cardiomyopathy syndrome. Low numbers of mortalities have been reported but due to the low number of fish on site it is high

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

percentages. Total mortality on site since April is 4957 but recent percentages have been 6.03%, 11.68% and 13.32%. The site is fitted with HDPE pen nets & predator nets."

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

APHA Delivery Team for this location:

Inverness

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

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Loch Duart

Likely CPH:	
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	
(S & W only) SBI/CRN/BRN	
(S & W only) On current XC selection? (Yes / No)	
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	

Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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))

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	02/10/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	18/09/2025
VRA Time:	16:45

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: [redacted]
Outer bay Loch Droighniche Loch Duart Salmon	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):	n/a
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	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 [redacted]@apha.gov.uk and [redacted]@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).

The seal predation was investigated in July 2025 remotely and all possible mitigating measures had been taken. The fish (broodstock) are currently 22/09/2025 being transferred to freshwater or harvested so the issue will no longer be a problem. Awaiting further information about cardiomyopathy, but this is a viral disease with no treatment or prevention, particularly in adult previously healthy adult salmon. As this site is broodstock this will be an important disease to mitigate against but only genetics and biosecurity help. Fish in their second year at sea are particularly affected, and these broodstock would be in this category. No sea cage inspection possible as fish are currently being moved.

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

Emailed Loch Duart, reply from [redacted]
[redacted]
Awaiting further information.

Spoke with [redacted], [redacted] at Uig for Loch Duart Salmon
[redacted]

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☐

1B - High (FSA/FSS) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☒
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) Delayed for up to eight weeks ☐	5 - Insufficient information No inspection ☐

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

Seal predation issue has already been investigated (previous WF77) and fish are currently being moved out of this location which will remove problem. No further information to be gained by visit to site.
The cardiomyopathy deaths correlate with the seal predation escalation, and are attributed to the increased stress on the fish. The site used aeration in the sea cages daily to reduce the stress. Cleaner fish were also used to reduce the need to handle the fish for other treatments and minimise any stress responses. The fish were removed to fresh water site early by helicopter to reduce the influence of cardiomyopathy and the seals. The company have ongoing programmes of genetic selection for the next generation of broodstock to choose the salmon that are the best feeders, lowest mortality and lowest pathology loads from multiple causes in order to have the healthiest strongest and most suitable fish as broodstock. No further information to be gained by a site visit, existing problems have either been removed or mitigated for as much as possible for disease situation.

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):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	~~22~~24/09/2025
Local Assessment time:	~~16:20~~13:40

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	26/08/2025	Referral	☒
Time call / email received :	25/08/2025 @ 16:52	Origin:	Other Third Party

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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

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 received from FHI:
We have had some further reports of increased mortality in some freshwater sites over the last couple of weeks.

Bakkafrost Scotland - Applecross smolt ongrowing 2 ([redacted]) has reported 3.22% (33,069 fish) for w/c 04/08/2025 and 5.06% (50,171 fish at ~226g) for w/c 11/08/2025 attributed to bacterial disease and water

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

quality. We are awaiting further information on these reports but they reported that they have started enhanced moribund removal and antibiotic treatment.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Applecross
Kishorn
Strathcarron
IV54 8XF

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:

N/A

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:	N/A
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Scotland
28 Drumsheugh Gardens
Edinburgh
EH3 7RN

Likely CPH:	N/A
Telephone number 1:	[redacted]
Telephone number 2:	N/A
(Scotland & Wales only) Active XC claimant? (Yes / No)	N/A
(S & W only) SBI/CRN/BRN	N/A
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	Unknown

Ongoing Complex case? (Yes / No)	Ongoing case
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

This is an ongoing case. It has been triaged as low priority – increased mortality due to bacterial disease and water quality which requires further investigation as there is indication that farm animal needs may not have been met previously, however no urgent action required as the site have already implemented antibiotic treatment and enhanced moribund removal.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	09/09/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	26/08/2025
VRA Time:	10:32

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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

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

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):

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

Role (N/A if not applicable):

Veterinarian completing Local Assessment:

Staff number:

Local Assessment date:

Local Assessment time:

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	17/6/25	Referral	☒
Time call / email received :	10:56	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	[redacted]
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)

Good morning,

I am writing to report a mortality event for the site Applecross Smolt Unit 2 (FS1362) for week 22 (02/06/2025 – 08/06/2025).
180,891 fish (21.39%) at 55g have died due to a Furunculosis infection one week post vaccination.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

To avoid further mortalitites and the spread to neighbouring units the remaining fish from that batch (~40,000) have been culled.
The unit will be fully disinfected prior to restocking.
The remaining Applecross units have been tested for Furunculosis and one has returned positive, it's currently being treated with antibiotics and mortalities have not increased.
We will keep monitoring the situation and we will be in touch should there be any further developments.

Kind regards,

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Applecross Smolt Unit [redacted]

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:

no

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:	n/a
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost
Applecross Smolt Unit 2 ([redacted])
Applecross Hatchery
Applecross
KISHORN
Highland
IV54 8XF

Likely CPH:	n/a
Telephone number 1:	n/a
Telephone number 2:	n/a
(Scotland & Wales only) Active XC claimant? (Yes / No)	n/a
(S & W only) SBI/CRN/BRN	n/a

(S & W only) On current XC selection? (Yes / No)	n/a
Last Sam welfare inspection date (N/A if not applicable):	No record
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Fish Health inspector is reporting an 21.39% mortality incident caused by furunculosis one week post vaccination.
To prevent further mortalities and infection the reast of batch (40,000) fish have been culled.
Unit will be destocked prior to restocking.
Remaining units have been tested and ab treatment has taken place in 1 positive group. Mortalities have not increased.
The affected fish are now dead. Preventitive measures are now underway to control and prevent further disease.
I am unsure whether the statement mortalities have not increased means that no further mortalities have occurred or whether mortalities are now at a normal level, or greater than normal.
For this reason I VRA this as LOW – 14 days, subject to local VRA who are more familiar with the situation.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	2/7/25
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	n/a
VRA Date:	17/6/25
VRA Time:	14:00

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):
	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 [redacted]@apha.gov.uk and [redacted]@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).

1 batch in the unit infected, and now culled with unit being disinfected. Other batch remains unaffected. Reasons given are water quality post vaccination, although vaccination went well. The water quality issue requires further investigation at next on site/or remote inspection.

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

Discussed with FHI, [redacted] and [redacted]	
	Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

As fish to which the welfare referral pertained have either died or been culled, no inspection required immediately. Issues involved to be discussed at next on site or remote inspection, likely July/Aug 2025.

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):	FHI
Name of APHA representative attending (N/A if not applicable):	n/a
Role (N/A if not applicable):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	17/06/2025
Local Assessment time:	16:30

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:	

dDepartment for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	04/09/2025	Referral	☐
Time call / email received :	15:28	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

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)

Anonymous complaint. [redacted]

Complaint about treatment of large numbers of smolts in fresh water fish farm.

[redacted]

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

High mortalities and large numbers of fish are badly injured, complainant has observed blind fish, cloudy eyes, eyes popping and fins not existent.

Complainant thinks this may be caused poor condition at this facility or by transport method and is concerned about how fish are transported to and to and from tanks in the facility and the pipe transfer line to the boat which receives the livestock. Vessel involved is: Name [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.)

Bakkafrost Scotland freshwater facility Applecross, Kishorn, IV54 8XF

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:

NA

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:	NA
Telephone number 2:	NA
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:	NA
Telephone number 1:	NA
Telephone number 2:	NA
(Scotland & Wales only) Active XC claimant? (Yes / No)	NA
(S & W only) SBI/CRN/BRN	NA
(S & W only) On current XC selection? (Yes / No)	NA
Last Sam welfare inspection date (N/A if not applicable):	NA

Ongoing Complex case? (Yes / No)	NA
Sensitive case? (Yes / No)	Yes
Listed on Hazard Database? (Yes / No)	No

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))

Recommend welfare visit – concerned about high numbers of fish mortalities and suffering due to injury.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	11/09/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	04/09/2025
VRA Time:	16:43

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: n/a
	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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

Bakkafrost Applecross have ongoing issues with transferring fish to the boat prior to transfer to sea. Currently unaware of what sea site this complaint refers to, trying to get more information. Visit to Applecross smolt units planned for September 2025, however these fish with transfer damage are now on a sea site and will required separate inspection.

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

VRA remains the same currently due to the suffering of a large amount of fish, however it may not be possible to visit within the 7 calendar days due to:
Sea cage/farm location currently unknown
Safety training required for sea inspections, currently planned for October 2025
Site where damage occurring, ie. Freshwater Applecross Kishorn site can be inspected, inspection planned for mid September 2025.
Resourcing issues, this WF77only received by case vet 08/09/2025

Date inspection required by (N/A if not applicable):	11/09/2025

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):	[redacted]
Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	08/09/2025
Local Assessment time:	12:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	03/11/2025	Referral	☒
Time call / email received :	09:56	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	N/A
Previously reported (Yes / No)	Not known
Previous APHA reference (incl. FSA referrals):	Not Known

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)

[redacted] the 3 Loch Duart Plc ([redacted]) Sites ([redacted], [redacted]) in week[redacted] The sites are currently facing a number of challenges and whilst actions are being taken to help alleviate these there are factors influencing how and when they can be delivered, therefore I would like to raise this as a potential welfare concern.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

[redacted]

The inspections were conducted after Salmosan treatments had been administered at all 3 sites. During the inspection skin abrasions on the flanks and head damage could be observed on a small amount of the population. The fish removed for sea lice counts also had evidence of some skin damage, however these areas were mostly clean of parasites. Adult female counts remain high (above 6/fish), however other stages seem to have reduced significantly post treatment.

Badcall Bay ([redacted] had the highest amount of moribunds (20-30/pen) due to ongoing gill issues. Some fish with severe sea lice damage were observed among the moribunds (red heads – these were less than 2 per pen). Clashnessie ([redacted]) and Calva Bay ([redacted]) had a much smaller number of lethargic fish observed.

I have attached some pictures from the fish removed at Badcall Bay ([redacted]) for diagnostic sampling, for evidence of gill issues and skin abrasions/head damage. Mortality numbers for the sites in week 42 were 6.03% (17,597) for Badcall, 1.34% (2,972) for Calva, and 1.35% (659) for Clashnessie. Week 43 were 3.13 (8,596) for Badcall and 2.29% (4,992) for Calva. Clashnessie is expected to fallow in the next few weeks (weather dependent).

AGD became prevalent on the Badcall Bay ([redacted]) site in week 16 2025. Freshwater treatments for gills using Loch Duart Plc's pump barge and tarp system were implemented. In weeks 21 & 22, pre adults were increasing on the Badcall site but adult females were not increasing. On this basis, a Salmosan treatment was delivered during a planned thinning operation that moved fish from Badcall to stock Calva Bay ([redacted]). This was effective at maintaining low levels of adult females until week 30 when lice numbers began to rise. In week 29 – 30 a FW treatment was administered to manage the AGD. This however had minimal impact on the rising lice numbers. In week 33 a further FW treatment was administered: the [redacted] however could only treat for 3.5 hours with the use of FLS on discharge. Clearance of leps during this treatment was poor due to the short time they were exposed to FW. Due to the poor clearance and steadily rising lice numbers after the [redacted] wellboat treatment in week 33, it was then decided that cleaner fish must be reintroduced to help manage the increasing adult lice number at the site (At the start of 2025 it was decided that cleaner fish would not be stocked on sites with active AGD management plans as these involved regular FW treatments. It was considered that the FLS system would be sufficient to provide lice clearance if required due to the low lice levels at the time). Cleanerifsh were stocked in week 36 and given 2 weeks of settling time. However by then the cleaner fish were possibly overwhelmed by the lice levels (adult females/fish were above 10 by week 38). A Salmosan treatment was scheduled but the start date was frequently deferred: the vessel was due at Badcall on the 03/10/25 but got pushed back due to mechanical repairs. Then the onset of Storm Amy at the start of October (4/10/25 onwards) and the latent weather of the following week added additional delays to the treatment starting. Treatments however were begun on the 16/10/25 and are currently ongoing. (similar weather/boat mechanical issues affected treatments at the Clashnessie and Calva Bay sites).

Ongoing strategy for the prevention, control and reduction of lice: Salmosan, freshwater and FLS treatments will be ongoing to establish and maintain control over lice numbers on site, along with additional cleanerfish stocking. The [redacted] is now chartered full time to Loch Duart Plc and an adjustable grader is to be fitted to facilitate the easier removal of cleaner fish from pens (so cleaner fish and FW treatments can be used simultaneously). Currently only fish above an average size of 2.8kg can be removed. The [redacted] will also be available full time for treatments from the 28/10/25. Tarp treatments will also be available but as a last resort dependent on weather and tidal conditions.

I hope this helps provide a better picture of how sea lice numbers have risen and why treatments have been delayed. A number of advisory/warning letters have been issued already with regards to sea lice management, and more recommendations will be issued to the company once the findings of the enhanced sea lice inspections have been reviewed.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

[redacted]

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:

Not known

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:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely CPH: [redacted]

Likely owner/keeper name and address (include postcode):		
Badcall Salmon House Scourie SUTHERLAND Highland IV27 4TH	Telephone number 1:	[redacted]
	Telephone number 2:	Not known
	(Scotland & Wales only) Active XC claimant? (Yes / No)	No
	(S & W only) SBI/CRN/BRN	Not known
	(S & W only) On current XC selection? (Yes / No)	No
	Last Sam welfare inspection date (N/A if not applicable):	Remote Inspection 24/9/25
	Ongoing Complex case? (Yes / No)	Yes
	Sensitive case? (Yes / No)	No
	Listed on Hazard Database? (Yes / No)	No

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))

Ongoing concerns from Fish Health Inspector – ongoing case monitored by [redacted] and [redacted] – WF77 requested

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	10/11/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	

VRA Date:	03/11/2025
VRA Time:	12:06

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
Amended CPH:	
Telephone number 1:	
Telephone number 2:	
(S & W only) Active XC claimant? (Yes / No)	N/A
(S & W only)SBI/CRN/BRN from CSC database:	N/A
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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

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 [redacted]@apha.gov.uk and [redacted]@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).

Badcall Bay

On 03 November 2025, SVI [redacted], who carried out the initial VRA above, confirmed to me that this WF77/VRA is specific only to the site [redacted], Badcall. Therefore, this VRA will not consider Calva and Clashnessie. I contacted [redacted], APHA SVI, to find out from here as noted above as being monitoring the site but [redacted] advised that [redacted] has not dealt with this specific site previously.
There seems to be a conflation of data for different sites and the report appears not to be chronological.
I have therefore looked at mortality and sea lice data for a period, November up to December 21st to find out if there was any action for APHA.

MORTALITY DATA: November to December 21st 2025 as supplied by FHI: week 45: 6.03%; week 46: 4.18%; week 47: 18.44%; week 48: 9.31; week 49: 11.65%; week 50: 2.77%; week 51: 1.75% (week ending December 21st) then 0.27% in week 52.
SEA LICE DATA: FHI served notices to the business and the company treated. The sea lice counts was 8.96% in week 45; 2.65% in week 46; 5.5% in week 47; 2.64% in week 48; 1.52% in week 49; 1.28% in week 50 and 0.2% in week 51. After the peak in week 45 (8.96%), sea lice levels came down to 0.2% in week 51. Sea lice treatment was carried out by the company, including freshwater and FLS.
Summary: The mortality was very high with a peak on week 47 (18.44%), but the trend has changed dramatically: 0.27% (week 51). The mortality was explained and has been attributed to Complex Gill disease and Amoebic Gill Disease. FHI also advised that treatment has been carried out by the company over this period including freshwater treatments, FLS and Salmosan which appear to have helped the situation as shown by the improved situation.
Sea lice levels were high 8.96% in week 45 but it kept decreasing up to 0.2% in week 51. FHI had served written advice and the company treated including with freshwater and FLS. On 11/03/2026 FHI who reported this to APHA, confirmed they do not plan to visit the site again.

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

N/A.

Name of LA:

Highland

Name of LA contact:

N/A

Local Assessment inspection requirement: (select one option only)

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

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

High mortality was explained by diseases/conditions known to cause severe mortality. Treatment was carried out by the company throughout the period. It is noteworthy that mortality has dropped dramatically from 11.65% to 0.27% in week 52 (see above). Similarly, sea lice levels were high but then gradually reduced with treatment completed on week 46 (see above). FHI who reported the situation and served the business written advice for sea lice do not intend to revisit as confirmed on 11/03/2026 by them. The site experienced high levels of sea lice severe mortality due to confirmed disease. Treatment was carried out. Both mortality and sea lice levels have greatly improved. Therefore, there is no action for APHA.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	Started on 03/11/2025
Local Assessment time:	15:40

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4653552

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:	[redacted]	Report type: Complaint	☒
Date:	07/07/2025	Referral	☐
Time call / email received :	14:22	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)	Yes
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 know that you are the correct authority for the public to report any concerns about animal welfare and cruelty.
I want to raise an issue with you as a matter of principle. I am not citing an urgent case, but something which I believe is fairly commonplace.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

On the other hand, I will cite a particular incident which could be taken up retrospectively. I am sure that current instances exist, but it is harder for me to find them than it would be for you.
It concerns the use of lumpfish specifically as cleanerfish on salmon farms. In particular, it concerns their use in exposed or 'high energy' sites.
There is considerable evidence, much of it from Norway, that lumpfish are by their nature very unsuited to life in exposed sites with fast currents. I will not cite it in detail here at this stage because you are more expert than I am and probably have good access and knowledge of the characteristics of different fish species. I will provide references and details later if you request them.
My point is very simple: The very act of putting lumpfish into such a situation is an act of cruelty and poor welfare of a farmed animal, by definition, regardless of what actually happens thereafter.
I will cite one particular example where the results have been disastrous. It may be that you have investigated it previously, but I have no way of knowing this.
The site is the farm called North Shore, Keose Pier, Keose, HS2 9JT. It is at Loch Erisort on the Isle of Lewis. It is operated by MOWI.
You can find all that you need to know in FHI Case Number: 2025-0109, A cumulative total of around 10,000 lumpfish died at this site earlier this year. I quote: 'Mortality has been attributed to wounds or fin damage. Health checks have been conducted on the Lumpfish, mortality is thought to have been caused following a few large storms in February of this year, the site is extremely exposed and the lumpfish are thought to have sustained some abrasion damage off the nets.'
Oddly, it is hard to find any trace of these mortalities in the monthly reports by Salmon Scotland. It is hard to imagine that the numbers are not sufficient to show against the overall population of salmon on site. Perhaps they just don't record cleanerfish deaths?
You can find similar problems at the same site in previous years via FHI Case Number: 2023-0160 and FHI Case Number: 2021-0411. Perhaps, given the nature of the site, it is not surprising that there are repeated problems. In a way, this just makes my point. To continue to stock the farm with lumpfish can be fairly judged to be a case of poor welfare and cruelty from the day they are introduced.
Many thousands of fish are dying in cages where the environment is completely unsuitable for their species. It all seems to have been very predictable. It is hard to believe that the FHI didn't ask you to investigate at the time. Perhaps they did.
I will say no more at this point, but leave it to you to make an investigation. I believe it would be appropriate for you to investigate events at North Shore retrospectively. I believe it would also be appropriate for you to find out whether there are any lumpfish in exposed sites at this moment and to undertake a live inspection wherever you find some.
I appreciate that it is not normal practice for APHA to report back to a complainant, but I am asking for a response here, please. Otherwise, I would have to go through the EIR process to find out what happened.
Best 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.)

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:

Marine Scotland (FHI)

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:	
Telephone number 2:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

North Shore,
Keose Pier,
Keose,
HS2 9JT

It is at Loch Erisort on the Isle of Lewis.
It is operated by MOWI

Likely CPH:	[redacted]
Telephone number 1:	
Telephone number 2:	
(Scotland & Wales only) Active XC claimant? (Yes / No)	
(S & W only) SBI/CRN/BRN	
(S & W only) On current XC selection? (Yes / No)	
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	
Listed on Hazard Database? (Yes / No)	

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 fish welfare of cleanerfish was compromised but the informant is not stating that it is an urgent case (no information if it is happening in that moment). It needs to be investigated retrospectively as ongoing issues were investigated by FHI (FHI Case Number: 2025-0109, FHI Case Number: 2023-0160 and FHI Case Number: 2021-0411).

FHI was not contacted yet, as we know they have been involved on that site, and case vet can contact FHI for all the information.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	21/07/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	07/07/2025
VRA Time:	15:30

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: N/A
	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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

This incident was allocated to me whilst I was on [redacted] so I dealt with it on my return from [redacted]. No local knowledge of this site. Scotland's Aquaculture | Site Details

The customer contacted APHA with general concerns round the suitability of certain sites, "high energy" to house cleaner fish. It is Marine Scotland who approve sites to be used by fish producers, not APHA so this generic concern is out of APHA's scope. I have passed this complaint to Marine Scotland, Fish Health inspectorate, as they approve fish sites so that they can evaluate these concerns in their remit.

The complainants did not indicate that the welfare needs of the cleaner fish are compromised at present at the site Keose, [redacted]. Marine Scotland officials visited this site on 07/04/25 and they do not plan to visit at this stage. They did not report any current welfare issues when I contacted them.

As to the referenced FHI's historic cases

Fish Health Inspectorate Case Number: 2025-0109; Marine Scotland confirmed that it does not refer to [redacted](Keose)
Fish Health Inspectorate Case Number: 2023-0160; it refers to [redacted], Keose; this is an historic case with high mortalities reported in the cleaner fish attributed to a bacterial infection.

FHI Case Number: 2021-0411; it refers to [redacted]; historic, high mortalities were reported in the cleaner fish on site, but no reason provided.

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

[redacted]

CNE-Siar

Name of LA contact:

[redacted]

Local Assessment inspection requirement: (select one option only)

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

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

General concerns as to the suitability of certain sites (high energy sites) to house cleaner fish but this is outwith APHA scope. APHA do not approve fish sites as this falls with Marine Scotland (they were passed this complaint for their evaluation and any action they might deem necessary). Marine Scotland have advised that they are not aware of research conducted by Scottish Government to evaluate the possible effects of high energy sites on cleaner fish. Also they have advised that their knowledge as to whether a site is high energy or not is anecdotal and derived from the local fish sites.
As regards the welfare of fish, which falls under APHA's remit, there are no indications of current welfare issues reported by the complainant at Keose, [redacted]. Marine Scotland reported to me that they visited [redacted] on 07/04/25 and they do not plan to visit at this stage.

Please see below as to the referenced FHI's historic cases, which can be found here Cases+20210390-20210430.pdf

FHI Case Number: 2025-0109; this incident is about Keose Cases+20250091-20250125.pdf Visited by FHI ON 07/04/25. Mortality in lumpfish attributed to the effects on fish of "a few large storms in February" causing fin damage to the fish. On the report the lumpfish mortality was highest in week 11 (9.28%) but had reduced considerably to 0.71% in week 14.

FHI Case Number: 2023-0160; this incident is about Keose; it refers to a visit by FHI carried out approximately 2 and a half years ago. Details of this visit can be found here Cases+20210390-20210430.pdf (from page 37 to page 53). High cumulative mortality of lumpfish attributed to *Pseudomonas anguillaseptica.*

FHI Case Number: 2021-0411: high cumulative mortality of cleaner fish noted in this report (page 86 to page 114); no reference to this being a "high energy" site in this report; the report refers to an inspection carried out by FHI almost four years ago.

In sum, concerns are

1) either concerning suitability of certain sites (high energy-exposed sites) to be used as sites to stock cleaner fish: the latter is out of scope for APHA so this complaint was referred to FHI who approve sites to be used to stock fish.
2) or of a historic nature at Keose. The complainant did not have any indication of a current welfare issue at Keose, nor did Marine Scotland when I approached them.

Conclusion: no visit required for APHA.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	14/07/25 [redacted]
Local Assessment time:	15:53

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4699389

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:	[redacted]	Report type: Complaint	☒
Date:	26/06/2025	Referral	☐
Time call / email received :	25 06 2025 at 10:20	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) N.A
- What notifiable disease is suspected? No
- 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):	N.A

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)

Complaint received via DV mailbox. This complaint is about farmed fish and is from [redacted].
Complainant states the video entitled "Video Tour of Mowi's Port Na Moine fish farm in Loch Craignish - operated by Kames Fish Farm" was taken on June the 3rd 2025.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Also footage labelled as dating June 19th entitled "Video Exclusive: Mowi/Kames is dead in the jellyfish-infested warming waters of Loch Craignish" showing a couple of dead fish for approximately 3 mins and June 20th.
Also footage labelled "Welfare Abuse at Mowi/Kames in Loch Craignish - missing tail and gasping at surface" focussing on one fish.

More videos and photos attached in the PDF document
Broad range of allegations some of which outwith APHA's remit;
Allegations of failure to comply with Animal Health and Welfare (Scotland) Act 2006 including section 19.
Allegations of biosecurity breaches: outwith APHA's remit
Allegations of mismanagement of ABP. APHA's remit.
Allegations of environmental pollution- SEPA remit.

Email with complaint and attached PDF document entitled: "Welfare and Bio-security Complaint vs Kames/Mowi– Port na Moine/North Moine in Loch Craignish" is attached to this WF77.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Aquaculture | Site Details

Port na Moine/North Moine in Loch Craignish

[redacted] **case vet to confirm with FHI.**

APHA Delivery Team for this location:

Scotland - Perth

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

[redacted] emailed this complaint to MS.fishhealth@gov.scot <SCDWildlifeCrime@scotland.pnn.police.uk> hello@rspcaassured.org.uk>; [redacted]; executive@rspca.org.uk

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:	Not provided
Telephone number 2:	Not provided
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):	Likely CPH: N/A [redacted]? Tbc with FHI
c/o Kames Fish Farming Ltd Kilmelford By Oban, Argyll PA34 4XA Scotland's Aquaculture | Site Details	Telephone number 1: n/k
	Telephone number 2: n/k
	(Scotland & Wales only) Active XC claimant? (Yes / No): N/A
	(S & W only) SBI/CRN/BRN: N/A
	(S & W only) On current XC selection? (Yes / No): N/A
	Last Sam welfare inspection date (N/A if not applicable):
	Ongoing Complex case? (Yes / No): No
	Sensitive case? (Yes / No):
	Listed on Hazard Database? (Yes / No):

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))

To evaluate the videos/photos attached. To contact officials of FHI to confirm location. This could be carried out as a remote inspection to start with and a physical inspection pencilled depending on the outcome of the remote evaluation carried out.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	10/07/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	26/06/2025
VRA Time:	13:23

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

This complaint with multiple footage appears to relate to the same one/few dead and moribund fish. Discussed with the FHI who have no immediate health or welfare concerns with the site and plan to schedule a remote meeting with them.

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Discussed complaint further with the FHI following their remote meeting with the site, as well as contacting the [redacted] for the site who provided the relevant requested data/information. Upon review of the evidence, average mortality across the site for the past 8 weeks has been low (average 0.435%/week) and the health and welfare of this crop is reported to be good which is evidenced through recent health reports and diagnostic results.

After considering all the available information provided, in my professional veterinary opinion, there are no current welfare concerns with the fish at this site. No further action is required at this stage.

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: [redacted]

Staff number: [redacted]

Local Assessment date: 23/07/2025

Local Assessment time:	10:28

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	13/01/2026	Referral	☐
Time call / email received :	13:36pm	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)
- What notifiable disease is suspected?
- Duty / RTG vet and VENDU informed of possibility of ND?

Third party reference	NA
Previously reported (Yes / No)	Unknown
Previous APHA reference (incl. FSA referrals):	NA

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 to DV Mailbox:Gob na Hoe fishfarm mortalities oct-nov25

[redacted], I am writing to highlight and register my deep concern over fish welfare at the Loch Duart's Gob na Hoe salmon farm, off Uig, Skye.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

[redacted]

Salmon Scotland's own reports recently published show an incredible 53.89% mortality of stock at this farm in the four weeks between 06/10/25 - 03/11/25, representing more than 500,000 fish deaths according to the FHI.
This has been followed by an almost equally as atrocious mortality of 32% at the same farm during the first two weeks of November, with a further 190,000 premature fish deaths recorded.

The reasons given are jellyfish/plankton.

Such figures can only speak to an almost complete inability to manage fish welfare by its operators Loch Duart at this location. I'm surely not alone in believing that any other livestock industry would not be permitted to record such mortalities of stock without due investigation into working practices and impact on the health of its stock.

While I understand that finfish open-net faming may be an alien industry to many of your staff, the above statistics represent very real, very serious, issues with respect to animal health in the U.K. and I trust that APHA, whose stated role is to *"work to safeguard animal and plant health for the benefit of people, the environment and the economy*", will take the matter seriously and act appropriately on this information highlighted.

I look forward to hearing back from you as to the action you will take,

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

[redacted]

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:

NA

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:	NA
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

Likely owner/keeper name and address (include postcode):		
Loch Duart PLC Floor 3 1 West Regent Street, Glasgow, Scotland, G2 1RW Loch Duart Ltd. Badcall Salmon House Scourie, Sutherland IV27 4TH, SCOTLAND	Likely CPH:	NA
	Telephone number 1:	[redacted]
	Telephone number 2:	NA
	(Scotland & Wales only) Active XC claimant? (Yes / No)	NA
	(S & W only) SBI/CRN/BRN	NA
	(S & W only) On current XC selection? (Yes / No)	NA
	Last Sam welfare inspection date (N/A if not applicable):	Unknown
	Ongoing Complex case? (Yes / No)	Unknown
	Sensitive case? (Yes / No)	Unknown
	Listed on Hazard Database? (Yes / No)	No

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))

Risk assessed as medium given high numbers of fish mortalities. However, I do not know what the history of welfare inspections is for this holding and this is pending local assessment.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☒	3 - Low Within 14 calendar days ☐
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	20/01/2026
Veterinarian completing VRA:	[redacted]

Uploaded to FARM (England only) (Yes / No)	NA
VRA Date:	13/01/2026
VRA Time:	15:10pm

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	Yes
Amended CPH:	N/A for fish
Amended owner/keeper name and address (include postcode):	
Telephone number 1:	[redacted]
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)	N/A
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	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 [redacted]@apha.gov.uk and [redacted]@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).

The complainant seems to be looking at historic Salmon Scotland data up to mid-November, not recent data. There has been severe mortality at this site. There have been multiple causes for this mortality, some microbial but also jellyfish and plankton both of which are known to cause problems to the fish, including to their gills.

FISH HEALTH INSPECTORATE (FHI)

FHI inspected this site on 06/11/25. Official samples by FHI confirmed gill pox virus, AGD and parasites, all of which explain high mortality. According to FHI the site did freshwater treatments once the gills situation improved. FHI do not plan to inspect again at present.
FHI have not received further reports of mortality from the site; the last mortality reported to FHI was 11.7% and relates to November.

COMPANY

I contacted the company on 16/01/2025 and spoke to [redacted], who is the [redacted] for the company. [redacted] confirmed that the site has faced severe mortality due to multiple causes. As regards the response to this issue [redacted] reported the following.
They called a vet who visited the site on 14/10/2025 and they had further conversations with the vet following the site visit in order to care for the welfare of the fish.
[redacted] reported that the vet recommended to wait to treat with freshwater until the environmental damage to the gills had improved. This because the vet considered that to treat before the gills had had a chance to improve might prove detrimental to the fish instead of beneficial. Daily checks on the fish, including screenings for AGD, were done by the company to assess when treatment could be started. A freshwater treatment was done on the 3rd of November. This treatment was reported to have been good for the fish. They started eating well soon after it. A second freshwater treatment was done as well.
It is noteworthy that [redacted] reported that the company became subsequently aware that the mortality had actually been 150'000 fish less than initially reported via Salmon Scotland. [redacted] advised that they identified an issue which overestimated the published mortality by 150000.
The mortality kept dropping from the time of the first treatment and as of today,16/01/2026, it was reported as 0.04%.
[redacted] reported that the fish are now doing "really well".

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

N/A

Name of LA:

Highland Council

Name of LA contact:

N.A

Local Assessment inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☐
1B - High (FSA/FSS) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☒

1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) Delayed for up to eight weeks ☐	5 - Insufficient information No inspection ☐

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

The complaint is historical. The site took action to deal with a complex situation which caused severe mortality. Their action included taking veterinary advice as to diagnosis and the correct time to treat for disease. The site reported that the treatments have worked well with mortality going down to 0.04% as of 16/01/2026. The site also reported that they have subsequently become aware that the salmon mortality reported via Salmon Scotland had been overestimated by them by 150.000 fish. Therefore, no further action for APHA.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	Started on 14/01/2025
Local Assessment time:	Approximately 09:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	26/08/2025	Referral	☒
Time call / email received :	16:52 on 25/08/2025	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? NA
- Duty / RTG vet and VENDU informed of possibility of ND? NA

Third party reference	NA
Previously reported (Yes / No)	No
Previous APHA reference (incl. FSA referrals):	NA

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)

On 25/08/2025, [redacted], reported the following:

Mowi Scotland Ltd - Lochailort Recirculation Hatchery ([redacted]) has reported 3.32% (290,074 fish at ~5g) for w/c 11/08/2025 – attributed to fungus. We don't have any further information on this as yet – we're

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

currently waiting for the company to get back to us. Once we have more information we will decide whether a visit is required – we are currently due to visit w/c 16 September for another purpose.

[redacted] followed up on this communication confirming that a visit may be required after liaising with Marine Scotland regarding their due visit to Mowi Scotland Ltd in mid-September 2025.

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

Lochailort Recirculation Hatchery ([redacted]) of Mowi Scotland Ltd located in Lochailort PH38 4LZ.

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:

The issue has been first reported to Marine Scotland whom have then informed APHA.

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:	-
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Mowi Scotland Ltd
Blar Mhor Office
Lochsyde
Highland PH33 7PT
[redacted]

Lochailort Recirculation Unit is a related location for this business and its CPH is [redacted]

Likely CPH:	[redacted]
Telephone number 1:	[redacted]
Telephone number 2:	[redacted]
(Scotland & Wales only) Active XC claimant? (Yes / No)	Unknown
(S & W only) SBI/CRN/BRN	NA
(S & W only) On current XC selection? (Yes / No)	No
Last Sam welfare inspection date (N/A if not applicable):	September 2021
Ongoing Complex case? (Yes / No)	No

Sensitive case? (Yes / No)	No
Listed on Hazard Database? (Yes / No)	No

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))

The issue started on the week commencing 11/08/2025 and Fish Health Inspectorate, Marine Directorate is already awaiting further information to verify whether a visit is required. The case vet will need to liaise with the contact above to assess visit requirements and whether a joint visit may be necessary. I set this visit as low priority although a joint visit with Fish Health Inspectorate may translate into an on-farm visit date which could fall after the due date for required inspection below (i.e., 09/09/2025).

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	09/09/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	
VRA Date:	26/08/2025
VRA Time:	09:48

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	No
Amended CPH:	N/A
Telephone number 1:	N/K
Telephone number 2:	N/K
(S & W only) Active XC claimant? (Yes / No)	

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

Mowi Scotland Ltd.
Lochailort
Inverness-shire
[redacted]

(S & W only)SBI/CRN/BRN from CSC database:	N/A
(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	N/K
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 [redacted]@apha.gov.uk and [redacted]@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).

I don't have local knowledge of this incident.

FHI: I contacted [redacted], FHI, and [redacted] advised they were planning to inspect on Friday 29/08/2025
Mortality: weekend ending 17th August: 3.32% (290.000) due to a fungal infection but situation reported to have been improving.

MOWI

I left a message to [redacted], [redacted] to call me back 12:10 on 27/08/2025.
I managed to speak with [redacted] (see below justification for details).

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

N/A	Highland Council
	Name of LA contact: N/A

Local Assessment inspection requirement: (select one option only)

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

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

Further data acquired (see below) show that a site inspection is no longer required due to mitigating factors. The company have taken satisfactory steps to deal with the issue; the overall picture has changed dramatically for the better, including mortality down from 3.32% (reason for reporting) to 0.1% as of 05/09/2025. The company's senior management have also confirmed that the [redacted] and the [redacted] had supervised and supported the actions of the local staff dealing with this increased mortality.

FURTHER DATA SUPPORTING A DIFFERENT ASSESSMENT

The company's senior management have advised that most of the fish which died came from chilled eggs that had appeared normal when processed; unfortunately, these eggs later resulted in a subpopulation of "poor doers", and this was not expected. The site advised that the fish which died were much smaller than the average weight of 5 grams/fish which had been reported by officials of Marine Scotland to the Animal & Plant Health Agency (hereafter APHA). The fish were very small, weighing an average 0.2 grams each (but the "poor doers" weighed less, 0.11 grams). The site also reported that the situation was compounded by a fungal infection caused by *Saprolegnia*; the company confirmed that they treated the fish to combat *Saprolegnia* and that *Saprolegnia* did not appear to be any longer an issue as of 05/09/2025.

It is noteworthy that the mortality has steadily declined from the initially reported 3.43% of week 34 to 0.1% of week 36 (time this incident is closed). Moreover, the fish are reported to be growing with a recorded weight increase week on week (weight arose from 0.2 grams to 0.52 grams at the time this incident is closed).

COMPANY'S PLAN FOR COMING WEEKS

The company senior management have advised that they will continue monitoring the situation. The site will continue collecting all mortality daily; they advised that this will allow for any flare-ups to be treated swiftly, and trends noted. The company's [redacted] will carry out routine visits at the site.

CONCLUSIONS

The site experienced severe mortality of a sub population of their fish; Further data acquired show a remarkable improvement. These data also show the actions which were taken by the company which included the supervision of a vet and the involvement of the company's senior management on top of the staff on site. Moreover, senior management have confirmed that they plan to keep monitoring the situation and act as required.

RECOMMENDATION

In light of the above, this incident can be closed and there are no further action for APHA field delivery team.

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:	[redacted]
Staff number:	[redacted]
Local Assessment date:	Started on 27/08/2025
Local Assessment time:	10:25

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	20/10/2025	Referral	☒
Time call / email received :	15:10	Origin:	Other Third Party

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	[redacted]
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)

FAO Duty Vet

Muck ([redacted] Mowi Scotland Ltd ([redacted]):
Week 40: 3.36% (40,328); Week 41: 2.97% (46,187)
FHI will attend wk43. Mortality attributed to salmonid rickettsial septicaemia(SRS), antibiotic treatment is being administered.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

If you need any further information please contact myself of the Duty inspector (copied in).

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.)

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:

N/A

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:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

MOWI Scotland
[redacted]
Site name
Muck
Address
The Pier
Isle of Muck
Inverness-shire
PH41 2RP

Likely CPH:	n/a
Telephone number 1:	n/a
Telephone number 2:	n/a
(Scotland & Wales only) Active XC claimant? (Yes / No)	n/a
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	n/a

Last Sam welfare inspection date (N/A if not applicable):	no
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Fish Health inspector is reporting high Mortality attributed to salmonid rickettsial septicaemia (SRS), antibiotic treatment is being administered. Company started the treatment already. So VRA this as LOW – 14 days, subject to local VRA.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	03/11/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	n/a
VRA Date:	20/10/2025
VRA Time:	16:25

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	yes
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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

Disease situation, with treatment already started. FHI to visit week 43 (wk 27 October). No previous history on SAM or any previous inspections for this site. Advise remote monitoring and liaise with FHI for more information of the disease situation, any diagnostics undertaken, underlying causes and to ensure all mitigating steps are taken in timely fashion.

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

Disease situation with slightly higher mortalities being reported around 3%. No discussion with LA at this time, as disease situation.

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

VRA kept as low, as follow-up required. FHI visit week 27 October 2025 and further information would be available after that visit. Remote follow up initially as disease situation.

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):	FHI
Name of APHA representative attending (N/A if not applicable):	
Role (N/A if not applicable):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	21/10/2025
Local Assessment time:	11:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

APHA reference WS-4712886

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:	[redacted]	Report type: Complaint	☐
Date:	20/10/2025	Referral	☒
Time call / email received :	15:10	Origin:	Other Third Party

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	[redacted]
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)

FAO Duty Vet

Seaforth ([redacted]) Mowi Scotland Ltd ([redacted]):
Week 40: 5.81% (49,274); Week 41: 8.34% (65,597)

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

FHI plan to attend wk44. Mortality attributed to Multi factor cause: HSMI, Yersinia and P. skyensis-like bacterial issues, antibiotic treatment is being administered.

If you need any further information please contact myself of the Duty inspector (copied in).

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.)

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:

N/A

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:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

MOWI Scotland
[redacted]
Site name
Seaforth
Address
The Old Ruin
Maaruig

Likely CPH:	n/a
Telephone number 1:	n/a
Telephone number 2:	n/a
(Scotland & Wales only) Active XC claimant? (Yes / No)	n/a
(S & W only) SBI/CRN/BRN	n/a

HS3 3AG	
(S & W only) On current XC selection? (Yes / No)	n/a
Last Sam welfare inspection date (N/A if not applicable):	no
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Fish Health inspector is reporting high mortality attributed to Multi factor cause: HSMI, Yersinia and P. skyensis-like bacterial issues, antibiotic treatment is being administered. Company started the treatment already. So VRA this as LOW – 14 days, subject to local VRA.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	03/11/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	n/a
VRA Date:	20/10/2025
VRA Time:	16:35

Local Assessment - To be completed by the local field team

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

Amended owner/keeper name and		
	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):	
	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 [redacted]@apha.gov.uk and [redacted]@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).

Disease situation, with treatment already started. FHI to visit week 44 (wk 2 November). No previous history on SAM or any previous inspections for this site. Advise remote monitoring and liaise with FHI for more information of the disease situation, any diagnostics undertaken, underlying causes and to ensure all mitigating steps are taken in timely fashion.

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

Disease situation causing high mortalities, monitor remotely with FHI, no discussion with LA at this time.

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

VRA kept as low, as follow-up required. FHI visit wk of 2 November and further information would be available after that visit. Remote follow up initially as disease situation.

UPDATED VRA WITH JUSTIFICATION FOR NO INSPECTION (01/12/2025)

This VRA is changed to negligible/no inspection. FHI confirmed on 01/12/2025 that they have inspected the site again at the beginning of November and that they had no major concerns. Moreover, they advised that the mortality at this site has dropped from 8.34% to 2.2% on week 46. It was also reported that the site are treating for gill disease meaning they are actively looking after their fish. Therefore, in light of the above, an inspection is not required. [redacted], [redacted], 01/12/2025

Date inspection required by (N/A if not applicable):	04/11/2025
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):	FHI
Name of APHA representative attending (N/A if not applicable):	
Role (N/A if not applicable):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	21/10/2025
Local Assessment time:	11:10

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☐
Date:	20/10/2025	Referral	☒
Time call / email received :	15:10	Origin:	Other Third Party

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	[redacted]
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)

FAO Duty Vet

Portree [redacted]) Bakkafrost Scotland ([redacted]):
Week 37: 10.04% (47,676); Week 38: 8.70% (37,136); Week 39: 12.20% (47,569); Week 40: 29.29% (100,260); Wk41: 7.85%
Mortality attributed to gill health related issues and bacterial disease.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

If you need any further information please contact myself of the Duty inspector (copied in).

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.)

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:

N/A

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:	
Email:	[redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Bakkafrost Scotland [redacted]
[redacted]
Site name
Portree
Address
8A Lisgarry Place
Portree
IV51 9BD

Likely CPH:	n/a
Telephone number 1:	n/a
Telephone number 2:	n/a
(Scotland & Wales only) Active XC claimant? (Yes / No)	n/a
(S & W only) SBI/CRN/BRN	n/a
(S & W only) On current XC selection? (Yes / No)	n/a

Last Sam welfare inspection date (N/A if not applicable):	Last report 18/09/25
Ongoing Complex case? (Yes / No)	no
Sensitive case? (Yes / No)	no
Listed on Hazard Database? (Yes / No)	no

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))

Fish Health inspector is reporting high mortality incident attributed to gill health related issues and bacterial disease. Last report on 18/09/25 and disease related mortality falls under FHI remit. Both Portree sites are supposed to fallow next week (wk43). So VRA this as LOW – 14 days, subject to local VRA by the case vet for last incident.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	03/11/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	n/a
VRA Date:	20/10/2025
VRA Time:	16:05

Local Assessment - To be completed by the local field team

Are farm details in above VRA considered correct? (If not, amend below) (Yes / No)	yes
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):	
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 [redacted]@apha.gov.uk and [redacted]@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).

Adverse gill health is underlying issue contributing to high mortality, as was the case in 18/09/2025 report of high mortality. The site is fallow from next week and as this is a disease situation, no need for an inspection on site but this WF77 and the previous should be discussed with FHI in first instance, and the fish farm to ensure all possible mitigating steps and treatments were undertaken in a timely fashion to reduce fish suffering as much as possible. The treatments for this last episode of gill health issues need to be investigated.
VRA left as low as a remote inspection/investigation is required but fish will all be harvested by then.

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

Disease is underlying reason for mortality and not discussed with local authority. Discussion with FHI needed to ensure all possible mitigating steps were taken.

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Local VRA kept the same however all the fish will be gone from this site by end of October, and remote inspection only required.

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):	APHA
Name of APHA representative attending (N/A if not applicable):	
Role (N/A if not applicable):	
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	21/10/2025
Local Assessment time:	10:30

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:	

Department for Environment, Food and Rural Affairs
Scottish Government
Welsh Government

Animal & Plant Health Agency

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:	[redacted]	Report type: Complaint	☒
Date:	23/06/2025	Referral	☐
Time call / email received :	Email from [redacted] on 23/06/2025	Origin:	Other Third Party

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? NO
- Duty / RTG vet and VENDU informed of possibility of ND? NO

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)

Complaint concerning cleaner fish, various concerns including cruelty.
Full details in the letter attached.
Retrospective complaint for period February -October 24

See attached letter, dated 1 April 2025, for details of allegations.

Welfare Category:

Farm	☒
Market	☐
Slaughter	☐
Transport	☐

OS Map Ref, or w3w location determined from the informant:

Not known

Reported location of animal(s):
(Details must be sufficient to determine an OS Map Reference. Include OS Grid Finder, CPH viewer, w3w extract etc.)

MOWI, Torridon site.

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:

The complainant has provided APHA with his letter this to the Crown Office and Procurator Fiscal

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: n/a

Email: [redacted]

Veterinary Risk Assessment (VRA)

To be completed in all cases by an APHA Veterinarian

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

Torridon Fish Farm
Shieldaig

IV54 8XN
[redacted]

Scotland's Aquaculture | Site Details

Likely CPH: N/A [redacted]

Telephone number 1: n/k

Telephone number 2: n/k

(Scotland & Wales only) Active XC claimant? (Yes / No): n/a

(S & W only) SBI/CRN/BRN:

(S & W only) On current XC selection? (Yes / No)	N/A
Last Sam welfare inspection date (N/A if not applicable):	
Ongoing Complex case? (Yes / No)	
Sensitive case? (Yes / No)	YES
Listed on Hazard Database? (Yes / No)	

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))

The allegations are retrospective. Recommended a remote assessment possibly followed by site inspection if required following analysis/assessment of the same allegations.

VRA inspection requirement: (select one option only)

1A - High Immediate, same day ☐	2A - Medium Within seven calendar days ☐	3 - Low Within 14 calendar days ☒
1B - High (Food Standards Agency (FSA)/Food Standards Scotland (FSS)) Urgent, within 24 hours ☐	2B - Medium (FSA/FSS) Within seven calendar days ☐	4 - Negligible No inspection ☐
1C - High Urgent, within 24 hours ☐	2C - High/Medium (FSA/FSS) ☐	5 - Insufficient information No inspection ☐

(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):	07/07/2025
Veterinarian completing VRA:	[redacted]
Uploaded to FARM (England only) (Yes / No)	N/A
VRA Date:	23/06/25
VRA Time:	10:15

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 CPH:	

Amended owner/keeper name and		
As above	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):	
	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 [redacted]@apha.gov.uk and [redacted]@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).

The allegations are historic, site visit planned. VRA remains LOW as no current suffering pertaining to this welfare concern

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

Name of LA:

Name of LA contact:

Local Assessment inspection requirement: (select one option only)

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

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

Date inspection required by (N/A if not applicable):	07/07/2025
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):	APHA
Name of APHA representative attending (N/A if not applicable):	[redacted]
Role (N/A if not applicable):	[redacted]
Veterinarian completing Local Assessment:	[redacted]
Staff number:	[redacted]
Local Assessment date:	23/06/2025
Local Assessment time:	16:00

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:	