

## Millar P (Peter)

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**From:** Peter MacDougall <Peter.MacDougall@dawnfresh.co.uk>  
**Sent:** 30 August 2017 17:15  
**To:** MS Marine Licensing  
**Subject:** Wellboat Licence Applications  
**Attachments:** Port na Mine Wellboat Application.zip; Scottish Gov.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon,

Please find attached two applications for Wellboat Licences for the Port Na Mine and Airds Point fish farms. Payment of the appropriate fee has requested by bank transfer and this will be completed tomorrow, 31<sup>st</sup> August. Please see attached notice of the impending payment.

Should you require any further information for either application please don't hesitate to contact me directly

Best regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*

**T:** [REDACTED]

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## **Marine Licence Application for Discharge of Treatment Agents from a Wellboat**

Version 1.0

### **Marine (Scotland) Act 2010**

## Acronyms

Please note the following acronyms referred to in this application form:

<b>BPEO</b>	Best Practicable Environmental Option
<b>CAR</b>	Controlled Activities Regulations
<b>MHWS</b>	Mean High Water Springs
<b>MPA</b>	Marine Protected Area
<b>MS-LOT</b>	Marine Scotland – Licensing Operations Team
<b>SAC</b>	Special Area of Conservation
<b>SEPA</b>	Scottish Environment Protection Agency
<b>SNH</b>	Scottish Natural Heritage
<b>SPA</b>	Special Protection Area
<b>SSSI</b>	Site of Special Scientific Interest
<b>WGS84</b>	World Geodetic System 1984

## Explanatory Notes

The following numbered paragraphs correspond to the questions on the application form and are intended to assist in completing the form. These explanatory notes are specific to this application and so you are advised to read these in conjunction with the Marine Scotland Guidance for Marine Licence Applicants document.

### **1. Applicant Details**

The person making the application who will be named as the licensee.

### **2. Agent Details**

Any person acting under contract (or other agreement) on behalf of any party listed as the applicant and having responsibility for the control, management or physical deposit or removal of any substance(s) or object(s).

### **3. Payment**

Indicate payment method. Cheques must be made payable to: The Scottish Government.

**Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.**

### **4. Application Type**

Indicate if the application is for a new wellboat discharge site or an existing wellboat discharge site. Provide the existing or previous consent/licence number and expiry date if applicable.

### **5. Marine Farm**

Indicate if you have a consent/licence for the marine farm where proposed treatment agent discharge is to take place and provide the consent/licence number and expiry date for the marine farm.

**Marine licence applications for discharge of treatment agents from a wellboat will not be determined without a valid marine licence for the marine farm.**

### **6. Wellboat Discharge Details**

- (a) Give a brief description of the discharge including rationale for discharge.
- (b) Provide the proposed start date of the project. The start date will not be backdated, since to commence a project for which a licence has not been obtained will constitute an offence, which may result in appropriate legal action. A licence is normally valid for the duration of the project but not exceeding 3 years. If a project will not be completed before a marine licence lapses, it will be necessary for licence holders to re-apply for a further licence to continue any ongoing work at least 14 weeks prior to the expiry date of the licence. **Target duration for determination of a marine licence application is 14 weeks.**

- (c) Provide the proposed completion date of the project.
- (d) Describe the location of the proposed works. Include a list of the latitude and longitude co-ordinates (WGS84) of the site where discharge will take place. WGS84 is the World Geodetic System 1984 and the reference co-ordinate system used for marine licence applications. Co-ordinates taken from GPS equipment should be set to WGS84. Coordinates taken from recent admiralty charts will be on a WGS84 compatible datum. Ordnance survey maps do not use WGS84.

**Example:** For positions read from charts the format should be as in the example: 55°55.555'N 002°22.222'W (WGS84). The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the format should be as in the example: 55°55'44"N 2°22'11"W (WGS84).

**It is important that the correct positions, in the correct format, are included with this application, as any errors will result in the application being refused or delayed.**

To supplement your application, please provide a suitably scaled extract of an Ordnance Survey Map (1:2,500 scale but not more than 1:10,000) or Admiralty Chart which must be marked to indicate:

- the discharge site and associated marine farm;
- latitude and longitude co-ordinates defining the location of the works;
- the level of MHWS;
- any adjacent SAC, SPA, SSSI, MPA, Ramsar or similar conservation area boundary.

Drawings and plans will be consulted upon. If they are subject to copyright, **it is the responsibility of the applicant to obtain necessary approvals to reproduce the documents and to submit suitably annotated copies with the application.**

- (e) Provide details of the water depth at the discharge site in metres and the distance of the discharge site from land in metres or kilometres.
- (f) Indicate if the discharge site is located within the jurisdiction of a statutory harbour authority and provide details of the statutory harbour authority where relevant.
- (g) Provide assessment of the potential impacts the works may have, including interference with other uses of the sea. Please include details of areas of concern e.g designated conservation areas, such as a SAC, SPA, SSSI, MPA or Ramsar site and shellfish harvesting areas. Further guidance on designated conservation areas can be obtained from SNH at this website: <http://gateway.snh.gov.uk/sitelink/index.jsp> and guidance on shellfish harvesting areas can be obtained from <http://www.foodstandards.gov.scot/> with regards to the Shellfish Waters Directive (2006/113/EC) which has parameters set to protect the water quality in which edible shellfish are grown.

Where there are potential impacts from the works, please provide details of proposed mitigation in response to potential impacts.

## **7. Details of Treatment Agent(s) to be Discharged**

Provide the proprietary name(s) of all treatment agents (e.g. Excis), the chemical name(s) or other relevant description(s) of all chemicals (e.g. Cypermethrin) and provide all appropriate Material Safety Data Sheets.

Under section 27(2) of the Marine (Scotland) Act 2010, the licensing authority has an obligation to consider the availability of practical alternatives when considering applications involving disposal of substance(s) or object(s) at sea. All applications for sea disposal must be supported by a detailed assessment of the alternative options - BPEO assessment. This must include a statement setting out the reasons why deposit of the substance(s) or object(s) at sea is the preferred option and applications will not be considered unless they are accompanied by such an assessment. All options in the BPEO must be explored fully (as per the guidance documents) otherwise your form and BPEO are liable to be returned to you, thereby delaying processing of the application.

## 8. Details of Discharge

For each treatment agent deposit listed in section 7 provide the date of discharge (wherever possible approximate date of discharge must be provided); duration of discharge in minutes (the estimated duration that the treatment agents being discharged are likely to be detectable/active in the water column); weight/volume of the treatment agent in grams/cubic metres (the discharge dose of each agent, including post treatment if required); and the total volume of the treatment agent (the total volume to be discharged from each vessel and also the number of wells in each vessel to be used during the procedure).

## 9. Details of Discharge Procedure

For each treatment agent deposit listed in section 7 provide the method of deposit (e.g gravity, discharge pump); the mode of deposit (e.g through a pipeline, valve, diffuser, bucket); the depth of deposit (e.g sea surface, subsurface with depth in metres); and the rate of deposit (e.g discharge rate – litres or m<sup>3</sup> per second, minute or hour. This must be given for each well).

## 10. Details of Vessel(s) Undertaking Discharge

Provide the name and call sign, if appropriate, of each of the vessels involved in the procedure. It is understood that vessel availability issues often lead to changes over small time scales to vessel choice. Please be as exhaustive as possible in the list of vessels that may be used to reduce the need for further administrative changes and continue on a separate sheet if necessary.

## 11. Scotland's National Marine Plan

Scotland's National Marine Plan has been prepared in accordance with the EU Directive 2014/89/EU, which came into force in July 2014. The Directive introduces a framework for maritime spatial planning and aims to promote the sustainable development of marine areas and the sustainable use of marine resources. It also sets out a number of minimum requirements all of which have been addressed in this plan. In doing so, and in accordance with article 5(3) of the Directive, Marine Scotland have considered a wide range of sectoral uses and activities and have determined how these different objectives are reflected and weighted in the marine plan. Land-sea interactions have also been taken into account as part of the marine planning process. Any applicant for a marine licence should consider their proposals with reference to Scotland's National Marine Plan. A copy of Scotland's National Marine Plan can be found at: <http://www.gov.scot/Publications/2015/03/6517/0>

Indicate whether you have considered the wellboat discharge with reference to Scotland's National Marine Plan and provide details of considerations made including reference to the policies that have been considered. If you have not considered the project with reference to Scotland's National Marine Plan please provide an explanation.

## 12. Consultation

Provide details of all bodies consulted and give details of any consents issued including date of issue.

## 13. Associated Works

Indicate whether the application is associated with any other marine projects (e.g. marine farm installation etc). If this is the case, provide reference/licence number for the related marine projects.

# Marine Licence Application for Discharge of Treatment Agents from a Wellboat

Version 1.0

## Marine (Scotland) Act 2010

It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Section 54 of the Marine (Scotland) Act 2010, all information contained within and provided in support of this application will be placed on a Public Register. There are no national security grounds for application information not going on the Register under the 2010 Act

### Public Register

Do you consider that any of the information contained within or provided in support of this application should not be disclosed:

(a) for reasons of national security; YES ☐ NO ☒

(b) for reasons of confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate commercial interest? YES ☐ NO ☒

If **YES**, to either (a) or (b), please provide full justification as to why all or part of the information you have provided should be withheld.

## WARNING

It is an offence under the Act under which this application is made to fail to disclose information or to provide false or misleading information.

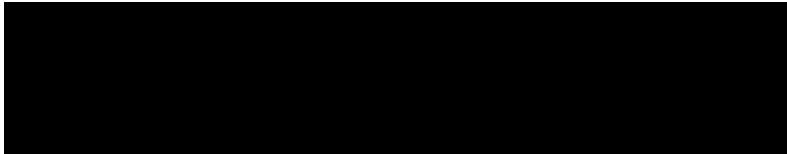
Target duration for determination is 14 weeks. Please note that missing or erroneous information in your application and complications resulting from consultation may result in the application being refused or delayed.

Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.

### Declaration

I declare to the best of my knowledge and belief that the information given in this form and related papers is true.

Signature



Date

28/08/2017

Name in BLOCK LETTERS

PETER MACDOUGALL

### Application Check List

Please check that you provide all relevant information in support of your application, including but not limited to the following:

- Completed and signed application form ☒
- Maps/Charts ☒
- Co-ordinates of the boundary points of the area of harbour jurisdiction (if you are a statutory harbour authority) ☐
- BPEO Assessment ☒
- Material Data Sheets for all treatment agents applied for ☒
- A copy of the CAR licence issued from SEPA ☒
- Standard Operating Procedure providing details of the proposed procedure for discharge of all treatment agents applied for ☒
- Additional information e.g. consultation correspondence (if applicable) ☐
- Payment (if paying by cheque) ☒

### 1. Applicant Details

Title: Initials: Surname:

Trading Title (if appropriate): Dawnfresh Farming Ltd

Address: Bothwellpark Industrial Estate, Uddingston, Lanarkshire, G71 6LS

Name of contact (if different): Peter MacDougall

Telephone No. (inc. dialing code):

Email: peter.macdougall@dawnfresh.co.uk

Statutory Harbour Authority? YES ☐ NO ☒

If **YES**, please provide a list of the latitude and longitude co-ordinates (WGS84) of the boundary points of the area of harbour jurisdiction using Appendix 01 Additional Co-ordinates form if necessary.

### 2. Agent Details (if any)

Title: Initials: Surname:

Trading Title (if appropriate):

Address:

Name of contact (if different):

Telephone No. (inc. dialing code):

Email:

### 3. Payment

Enclosed Cheque ☒ Invoice ☐

Contact and address to send invoice to:

Applicant ☒ Agent ☐ Other ☐

If **OTHER**, please provide contact details:

Title: Initials: Surname:

Address:

Email:



#### 4. Application Type

Is this application for a new wellboat discharge site or an existing wellboat discharge site:

New Site ☒ Existing Site ☐

If an **EXISTING SITE**, please provide the consent/licence number and expiry date:

Consent/Licence Number	Expiry Date

#### 5. Marine Farm

Do you have a consent/licence for the marine farm where proposed treatment agent discharge is to take place?

YES ☒ NO ☐

If **YES**, please provide the consent/licence number and expiry date:

Consent/Licence Number	Expiry Date
05260/14/0  CAR/L/1010366	21st July 2020

#### 6. Wellboat Discharge Details

(a) Brief description of the discharge including rationale for discharge:

Discharge of water and chemical product following treatment of farmed fish for sea lice. Wellboat treatment can be necessary as an alternative sea lice treatment in certain weather and fish health conditions.

(b) Proposed start date (**Target duration for determination of a marine licence application is 14 weeks**):

asap

(c) Proposed completion date:

Ongoing

(d) Location:

Discharge will take place at the cage edge of the cage being treated at Port Na Mine fish farm.

Latitude and Longitude co-ordinates (WGS84) defining the proposed discharge point (continue on Appendix 01 Additional Co-ordinates form if necessary):

Latitude										Longitude										
5	6	°	2	7	.	0	3	2	' N	0	0	5	°	1	1	.	4	9	2	' W
5	6	°	2	6	.	9	7	7	' N	0	0	5	°	1	1	.	4	1	5	' W
5	6	°	2	6	.	9	2	5	' N	0	0	5	°	1	1	.	7	4	3	' W
5	6	°	2	6	.	8	7	0	' N	0	0	5	°	1	1	.	6	6	5	' W

(e) Water depth and distance from land:

Water Depth (metres)	Distance from Land (metres/kilometres)
60m	80m

(f) Is the discharge site located within the jurisdiction of a statutory harbour authority?

YES ☐ NO ☒

If **YES**, please specify statutory harbour authority:

(g) Potential impacts the works may have (including details of areas of concern e.g. designated conservation and shellfish harvesting areas) and proposed mitigation in response to potential impacts (continue on separate sheet if necessary):

Discharges from wellboats will be in line with the consented medicines permitted by the CAR Licence for this site. Modelling of the site has been carried out and consented through the CAR licence regulatory regime and are not expected to present any increased environmental impact.

**7. Details of Treatment Agent(s) to be Discharged** (Please provide Material Safety Data Sheets for each chemical to be discharged).

Proprietary Name of Treatment Agent(s)	Chemical Name of Treatment Agent(s)
A phamax	De tamether n
Paramove	Hydrogen Perox de
Sa mosan/Sa mosan Vet/Azasure	Azameth phos
Ex s	Cypermethr n

**8. Details of Discharge** (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Date of Discharge (approx.)	Duration of Discharge (minutes)	Weight/Volume of Agent (grams/cubic metres)	Total Volume (including solvent) (cubic metres)
1	As required	As per CAR Licence	As per CAR Licence	As per CAR Licence
2				
3				
4				
5				

**9. Details of Discharge Procedure** (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Method of Deposit	Mode of Deposit	Depth of Deposit (metres)	Rate of Deposit (litres or cubic metres per second/minute/hour)
1	Discharge Pump	Valve	4m	2,500m3/hr
2	Discharge Pump	Valve	4m	3,900m3/hr
3				
4				
5				

**10. Details of Vessel(s) Undertaking Discharge** (continue on a separate sheet if necessary):

Vessel Name	Registration Details/Call Sign (if appropriate)	Name and Address of Operator
Solondoy	EI 7195 / IMO No. 9158654	Johnson Marine, Marine Park, Vidlin, ZE2 9QB
Viking Caledonia	2JBO3 / IMO No. 9125188	Johnson Marine, Marine Park, Vidlin, ZE2 9QB
Viking Atlantic	3YIW / IMO No. 9167954	Johnson Marine, Marine Park, Vidlin, ZE2 9QB

Norholm	2BVA2 / IMO No. 9139567	North Isles Marine Ltd. Kletttrlea, Burravoe, Yell, Shetland, ZE2 9BA
Settler	2JCE9 / IMO No. 9258703	North Isles Marine Ltd. Kletttrlea, Burravoe, Yell, Shetland, ZE2 9BA

#### 11. Scotland's National Marine Plan

Have you considered the application with reference to Scotland's National Marine Plan?

YES ☒ NO ☐

If **YES**, provide details of considerations made including reference to the policies that have been considered:

Aquaculture 11: Using wellboat treatments allows treatments to be carried out in a wider range of weather conditions when it is not always preferable to use a tarpaulin treatment. This licence will allow flexibility to undertake the most appropriate method of treatment for the conditions experienced.

If **NO**, please provide an explanation of why you haven't considered the National Marine Plan?

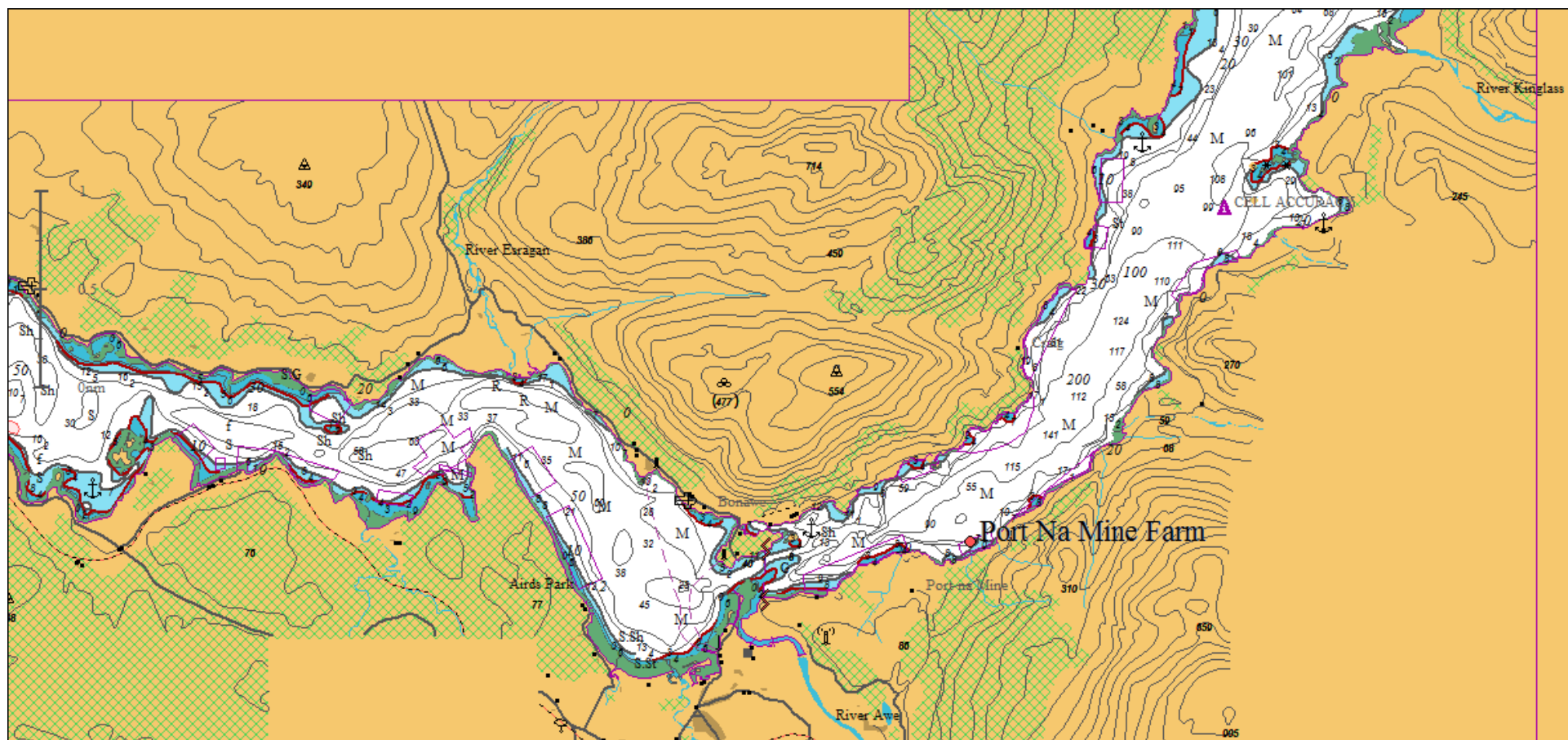
**12. Consultation**

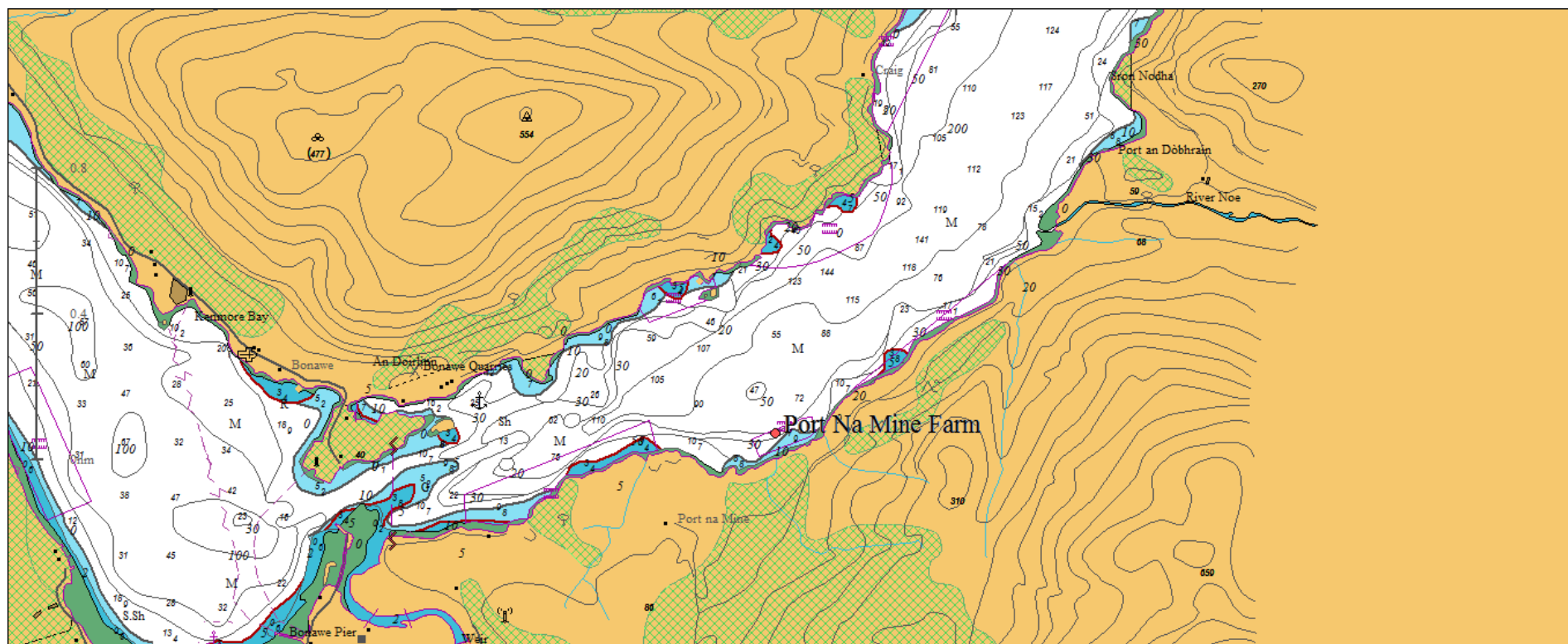
List all bodies you have consulted and provide copies of correspondence:

Consultation with conservation bodies was undertaken at the time of determination of the SEPA CAR Licence

**13. Associated Works**

Provide details of other related marine projects, including reference/licence numbers (if applicable):





## MARINE (SCOTLAND) ACT 2010, PART 4: MARINE LICENSING

### BEST PRACTICABLE ENVIRONMENTAL OPTION (BPEO) ASSESSMENT: DISCHARGE OF FISH FARM CHEMICAL TREATMENT AGENTS FROM A WELLBOAT

#### **1. Introduction**

##### **1.1 Background to application**

This Best Practicable Environmental Option (BPEO) assessment supports an application for a sea disposal licence under the Marine (Scotland) Act 2010, Part 4, Marine licensing.

The purpose of this application is to ensure that all possible options are available as a treatment disposal method which in turn allows greater flexibility and allows all options for the fish to have an effective treatment when needed. The sites currently use tarpaulin treatments to administer any necessary sea lice medicines however as a responsible operator we are ensuring that all treatment methods are available to use to ensure best welfare of the stock.

##### **1.2 Source of materials**

**List the treatment products you wish to discharge following treatment.**

- **Excis, Alphamax, AMX, Salmosan, Salmosan Vet, Azasure or Paramove 50**

**E.g.**

Materials –Excis- are supplied by:

Novartis Animal Health UK Ltd  
New Cambridge House  
Litlington  
Nr Royston Dundee  
Herts  
SG8 0SS

Materials are manufactured by:

Vericore Ltd  
Kinnoull Road  
Kingsway West  
DD2 3XR

#### **Alphamax/AMX**

Materials are supplied by:-  
AMX™

Company name: PHARMAQ Limited  
Address: Unit 15, Sandleheath Industrial Estate  
Fordingbridge, Hampshire  
SP6 1PA  
Telephone: 01425 656081  
Fax: 01425 657992

Materials are manufactured by:-  
PHARMAQ AS  
Skogmo Industriområde  
N-7863 OVERHALLA,  
Norway  
Tel - +47 74 28 08 00

Email: [orders@pharmaq.no](mailto:orders@pharmaq.no)



Website: www.pharmaq.no

### **Salmosan/Salmosan Vet**

Manufacturer/Supplier:

Fish Vet Group Tel: +44 (0) 1463 717774

22 Carsegate Road Fax: +44 (0) 1463 717775

Inverness eMail: info@fishvetgroup.com

IV3 8EX

Scotland UK

· Further information obtainable from:

+44 (0) 1463 717774

eMail: info@fishvet.com

· Emergency telephone number:

UK : +44 (0) 845 0093342

International: +44 (0) 1233 849729 (24/7)

### **AZASURE**

Materials are supplied by:-

Europharma Scotland Ltd.

Unit 5 Dunrobin Court

14 North Avenue

Clydebank Business Park

Clydebank

G81 2QP

Tel +44(0)141 435 7100

Fax: +44(0)141 435 7199

Materials are manufactured by:-

Neptune Pharma Limited,

Regus House,

Victory Way,

Admirals Park,

Crossways,

Dartford,

DA2 6QD

### **PARAMOVE 50**

Materials are supplied by:-

Aqua Pharma Ltd

2 Seafeld Road,

Inverness IV1 1SG

Telephone/fax: 44 1463 233361

post@aqua-pharma.no

## **1.3 Description (nature and volume) of materials**

**Refer to Product Data Sheets and Material Safety Data Sheet and provide these in Annexes to the BPEO.**

**Excis™** – Clear, yellow tinted, cutaneous solution for water born use, with an alcoholic odour containing 1% w/v Cypermethrin (cis40:trans60). It is to be administered by addition to seawater. Treatment dose: 0.5m/m<sup>3</sup> sea water. This is equivalent to 5µg cypermethrin/litre sea water.

**Alphamax/AMX** – Slight yellow liquid, faintly smell of amines, freely soluble in water. 1% w/v Deltamethrin.

**Azasure** – Fine beige powder in water soluble sachet, 1g of powder contains 500mg Azamethiphos. To achieve a final concentration of 0.1ppm azamethiphos, 0.2g of the power much be added per cubic meter of water, i.e., 1x100g sachet treats 500 cubic meters.

**Salmosan** – A wettable powder containing 50% w/w azamethiphos for dilution in water and subsequent administration by the bath technique

**Salmosan Vet** – Azamethiphos 50% w/w powder for suspension for fish treatment. Azamethiphos 500mg/g

**Paramove** – Hydrogen Peroxide 49.5%, concentrate for solution for fish treatment, the product is a clear colourless liquid

#### **1.4 Details of previous operations including current practice**

Please see attached Standard Operating Procedure for bath treatment in tarpaulins and a procedure describing wellboat operations. Dawnfresh Farming hold Car Discharge licences for all the medicines and amounts that would be administered within the wellboat and discharged from the wellboat at the site.

### **2. Discussion of Available Disposal Options**

#### **2.1 Land discharge via an outfall**

The volumes of water make land discharge practically and technically unfeasible. Furthermore depths of waters close to the shore don't allow a large vessel to come inshore.

#### **2.2 Sea disposal**

##### **2.2.1 Fish farm cages via CAR consent**

- CAR licences allow a limited number of cages to be treated per day
- It requires full enclosure tarpaulins that can be difficult to handle when it comes to this size.
- The hydrographic conditions also come into play as strong tidal/freshwater currents can occur in this area.
- Adverse weather conditions affect tarpaulin treatment more than wellboat treatment (waves, wind)
- The risk of fish mortality is increased when using tarpaulins.

##### **2.2.2 Fish farm cages via marine licence**

This option is currently being applied for through this Marine (Scotland) Act licence and involves a treatment within a wellboat followed by a discharge at each site. Advantages of this method below:

Treating fish with chemotherapeutants at the fish farm cages in a wellboat gives access to a controlled environment in which to treat the fish. Seawater temperature control in the wells will allow the environment in which to treat the fish that increases the fish welfare during treatment. The volume of seawater in the well is known; this ensures an exact dose of treatment chemical and be administered.

### **2.2.3 Location other than at fish farm cages**

Not allowable under marine licensing at present.

### **2.3.4 Pre-treatment options prior to discharge at sea**

There are no pre-treatment options

## **3. Aspects to be taken into consideration**

**For each option identified, the assessment should include reference to the following:**

### **Within Farm Farm Cage via CAR Consent**

- Weather conditions, in particular wind, wave and freshwater input action restricts the use of full tarpaulins
- Number of fish held in tarpaulins result in a high oxygen demand during treatment & can be difficult to maintain adequate oxygen levels in the water.
- Stress levels in fish are monitored during treatment
- Risk of fish mortality is increased significantly when using full tarpaulins through oxygen stress & overcrowding, this is overcome with full training.
- Equipment required to supply adequate oxygen (diffusers, ladders, oxygen crates) is an additional obstruction in shallow cages that can damage and stress the fish.

### **Fish Farm Cages via Marine licence (wellboat)**

- Advantage of using wellboat treatments, is that well volume is absolute and known.
- Well volume and biomass info allows dose to be calculated more accurately, giving a more effective treatment.
- Well boat is particularly useful if grading or transporting fish operations are occurring since the use (and cost) of well boat is already planned.
- Although there are no proven pre-treatment options prior to discharge at sea, there will be dilution of medical compound before discharge from wells.
- During treatment there is a continuous circulation of water being pumped through the closed wells and following the treatment, there is a continuous recirculation of seawater into the wells.
- There is a possibility that discharge periods could be worked around the tide timetables, since the wellboats can control discharges.
- The wellboat availability is restricted within the loch and may also be postponed at the last minute due to business operations.
- The cost of wellboat hire is very expensive.

## **3.1 Strategic considerations**

### **3.1.1 Operational aspects, including handling, transport, etc.**

All treatments are under veterinary supervision and/or instruction. All operations are carried out following written Standard Operating Procedures (please refer to enclosed document).

### **3.1.2 Availability of suitable sites/facilities**

This falls under the Farming Production Manager responsibility. It consists in booking a suitable wellboat, for a defined period and a defined task.

### **3.1.3 Legislative implications, both national and international**

Marine licence sought.

All sites operated by Dawnfresh Farming Ltd have CAR licences for the discharge of chemicals in 1.2.

### **3.1.4 Summary of the outcome of discussions with third parties (If possible, copies of consultees replies should be appended to the assessment)**

There have been no formal discussions with third parties. However, Dawnfresh Farming is part of a Farm Management Agreement with all other operators in that area where all operators strive to achieve control over sea lice infestations.

## **3.2 Environmental considerations**

### **3.2.1 Safety implications**

Please see attached Material Safety Data Sheet.

### **3.2.2 Public health implications**

The only Public Health implication identified relates to Food Safety, with consumption of medicated fish. As Excis, AlphaMax, Salmosan and SalmosanVet are Prescription Only Medicines, all treated fish undergo a withdrawal period prior to slaughter. Farming traceability system ensures this period is adhered to prior to harvesting. Where shellfish farming interest are located within the vicinity of the fish farm cages they have been consulted during the SEPA licencing process.

### **3.2.3 Pollution/contamination implications, including discussion on: accumulation, toxicity, hazards, persistence, short and long-term impacts, dilution and dispersion, etc.**

SEPA has introduced new thresholds for medicines used to treat sea lice infestations in marine fish farms.

It follows the publication in 2005 of a five-year study monitoring and measuring the potential environmental impacts of using sea lice medicines. The independent PAMP\* report confirmed there was no evidence of any impact from these substances on the environment which could be separated from the natural variation found in marine ecosystems.

As a result, the modelling approach, which is currently used to determine the licence, limits for sea lice bath treatments will be changed, extending the time period over

which the dispersal of the medicine is modelled from three to six hours.

The use of the revised modelling approach removes some of the precaution in the way that the sea lice treatment AlphaMAX, Excis, Salmosan and SalmosanVet is licensed, allowing fish farmers to more effectively treat sea lice infestations at marine cage fish farms. More effective treatment of such infestations may lead to benefits for wild salmon populations.

Full details of the PAMP report are available at:

<http://www.sams.ac.uk/research/coastal%20imapcts/ecol.htm>

And the revised modeling documentation can be found at:

[http://www.sepa.org.uk/pdf/guidance/fish\\_farm\\_manual/annex/G.pdf](http://www.sepa.org.uk/pdf/guidance/fish_farm_manual/annex/G.pdf)

#### **3.2.4 Interference with other legitimate activities, e.g. fishing operations, other aquaculture interests**

Dawnfresh Farming currently operates under an active Farm Management Agreement which is communicated across other operators with the disease management area. Dawnfresh Farming is the only operator within Loch Etive however, we currently communicate with and have the same goal of achieving zero sea lice on our stock.

#### **3.2.5 Amenity/aesthetic implications**

Not applicable

#### **3.2.6 Best practice guidance and mitigation measures**

A wellboat allows precise measurement of volume and administration of chemical, possibly resulting in the use of less product than enclosed cages using tarpaulins, the treatment also has the potential to have a more effective treatment due to the controlled environment. Given the discontinuous nature of the discharge it is possible to discharge at precise times (taking tides into consideration). Fish welfare may also be less at risk in a well boat due to the more controlled nature of the environment.

### **3.3 Cost considerations**

#### **3.3.1 Capital costs, e.g. site costs, transport hire/purchase costs, equipment hire/purchase costs etc.**

- £3,300/day for Treatment Work Boats for Tarp treatments
- Oxygenation equipment
- £6,000/day for Wellboat treatments

#### **3.3.2 Operating costs, e.g. labour costs, site operation costs, transport costs, equipment costs, environmental monitoring costs etc.**

Labour costs per/day treating with Wellboat would be £300-£500

Labour costs per/day treating with Tarpaulin would be £1,000

#### **4. Conclusions**

##### **4.1 Summary of available options**

The only two options to discharge are either under SEPA/CAR licence or under marine licence.

##### **4.2 Summary of pros and cons of each option**

The following table summarise aspects of each scenario:

Options	Cost	Chemical usage	Technical difficulty	Logistics	Environmental impact	Treatment efficacy	Risk to livestock	Strategic acceptability
Tarpaulin–CAR consent	High to Moderate	High	Very labour intensive.	Weather and tidal restrictions apply	Moderate	Good	Very high	Low
Wellboat – Marine licence	Very High	Moderate	Less labour intensive and more efficient	Boat availability, cost and size are the only restrictions	Low	Good	Moderate to High	High

##### **4.3 Identification of BPEO**

It is clear from the report that the best environmental option is via the use of the wellboat, however generally the same amount of active ingredient is entering the environment regardless of discharge method. With sufficient training and good weather conditions full tarpaulin treatments are just as effective. Wellboats are expensive to hire and are limited in number of suitable vessels that can enter into Loch Etive. The purpose of this application is to ensure that all possible options are available as a treatment disposal method which in turn allows greater flexibility and allows all options for the fish to have an effective treatment when needed.

# PUBLIC REGISTER

## SCOTTISH ENVIRONMENT PROTECTION AGENCY

### WATER ENVIRONMENT AND WATER SERVICES (SCOTLAND) ACT 2003

### THE WATER ENVIRONMENT (CONTROLLED ACTIVITIES) (SCOTLAND) REGULATIONS 2005 ("THE REGULATIONS")

#### WATER USE LICENCE

**Licence No:** CAR/L/1010366  
**To:** Kames Fish Farming Limited  
**Address:** Kilmelford  
by Oban  
Argyll  
PA34 4XA

The Scottish Environment Protection Agency, in accordance with regulations 9 and 15 of the Regulations, hereby grants a licence to Kames Fish Farming Limited, company registration number SC051158 having its registered office at Kilmelford, by Oban, Argyll, PA34 4XA ("the responsible person") to carry on controlled activities as described in Schedule 1 of this Licence, subject to the requirements of the Regulations and to the conditions contained in the schedules attached to and forming part of this licence. The responsible person shall secure compliance with the conditions contained within this licence. This licence shall take effect on 7 December 2006.

Signed.   
Authorised to sign on behalf of the  
Scottish Environment Protection Agency

Date: 7 September 2006

#### Right of Appeal

Under regulation 46(b) of the Regulations you are entitled to appeal to the Scottish Ministers if you have been granted a form of authorisation which is different from the form of authorisation which you believe ought to have been granted, within three months of the date of this licence. Under regulation 46(c) of the Regulations you are entitled to appeal to the Scottish Ministers against any condition or conditions of this licence, within three months of the date of this licence. The bringing of an appeal against a condition shall not have the effect of suspending the operation of the condition. The procedures for the making of an appeal are set out in Schedule 9 of the Regulations.

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## INTERPRETATION OF TERMS

For the purposes of this Licence, and unless the context requires otherwise, the following definitions shall apply:

### Generic

"the Act" means The Water Environment and Water Services (Scotland) Act 2003

"controlled activity" means an activity to which the Regulations apply, in accordance with regulation 4(1) of the Regulations;

"Incident" means any of the following situations:

- Where an accident occurs which has had or could have an adverse impact on the water environment;
- Where any malfunction, breakdown or failure of plant or techniques is detected which has had or could have an adverse impact in the water environment;
- Any event, such as *force majeure* or emergency actions, which results, or is likely to result, in a breach of any condition of this licence;

"responsible person" means the person who is responsible for securing compliance with the terms of this licence and has been identified as such by SEPA in accordance with 9(6) of the Regulations, and in this context 'person' includes a body corporate, limited liability partnership and Scottish partnership;

"SEPA" means the Scottish Environment Protection Agency;

"SEPA officer" shall mean a person authorised under the Regulations;

"the Regulations" means Water Environment (Controlled Activities) (Scotland) Regulations 2005;

"the water environment" means all surface water, groundwater and wetlands; and "surface water", "groundwater" and "wetlands" shall have the same meaning as in the Act;

Any reference to a numbered Condition, group of Conditions, Schedule, Table, Appendix, Figure or Paragraph is a reference to the condition, group of conditions, schedule, table, appendix, figure or paragraph bearing that number in this licence;

Except where specified otherwise in this Licence:

- "day" means any period of 24 consecutive hours,
- "week" means any period of 7 consecutive days,
- "month" means a calendar month,
- "quarter" means a calendar quarter,
- "year" means any period of 12 consecutive months;

and any derived words (e.g. "monthly", "quarterly") shall be interpreted accordingly;

Except where specified otherwise in this licence, any reference to an enactment or statutory instrument includes a reference to it as amended (whether before or after the date of this licence) and to any other enactment, which may, after the date of this licence, directly or indirectly replace it, with or without amendment;

### **Point Source**

"parameter" means any defined chemical constituent or measurable physico-chemical characteristic of a sample;

"point source discharge" means a discharge of an effluent or other matter to the water environment or land by a fixed installation, pipe, outlet or otherwise;

"pollution", in relation to the water environment, means the direct or indirect introduction, as a result of human activity, of substances or heat into the water environment, or any part of it, which may give rise to any harm, and "harm" shall have the same meaning as in the Act;

Any reference to "fish produced" or "annual fish production" shall be construed as the weight of fish at the end of any 12 month period plus the weight of fish removed during that period due to mortality, culling or slaughter less the weight of fish at the beginning of that period.

**1 SCHEDULE 1: CONTROLLED ACTIVITIES****1.1 Controlled Activities Description**

1.1.1 The controlled activity(ies) is for the primary purpose of the rearing of Rainbow Trout in cages.

**1.2 Controlled Activity Locations**

1.2.1 The following controlled activity(ies) described in Table 1 are authorised under Licence and as submitted with the application for this licence.

Table 1

Name/Reference	Associated Waters	Activity
<b>Port na Mine cage fish farm</b>	<b>Port na Mine, Loch Etive</b>	<b>Discharge of effluent from fish farm cages</b>

## **2 SCHEDULE 2: GENERAL CONDITIONS**

### **2.1 Responsible Person**

- 2.1.1 The responsible person to whom this Licence is issued shall secure compliance with the Conditions contained within this Licence.

### **2.2 Records**

- 2.2.1 A copy of this Licence shall be kept at Kames Fish Farming Limited, Loch Etive site, Inverawe, Taynuilt, Argyll PA35 1HU and shall be made readily accessible for examination by all relevant staff.
- 2.2.2 Unless otherwise specified in a Condition of this Licence, every record made in compliance with a Condition of this Licence shall be preserved for not less than five years from the date of its being made. Every such record shall be kept on the site specified in 2.2.1 above for not less than one year from the date of its being made and thereafter preserved at a location, previously notified to SEPA in writing, if that location is not the above site.
- 2.2.3 All records shall be legible, and any amendment made to any record made in compliance with a Condition of this Licence shall be made in such a way as to leave the original entry clear and legible. The reason for each amendment shall be explained in the said record.

### **2.3 Reporting**

- 2.3.1 Where any Condition of this Licence requires information to be reported, a report shall be forwarded in a format agreed with SEPA, to SEPA at the address specified in the explanatory notes attached to this Licence, on the date(s) or within the period or at the frequency specified in Schedule 6. All such reports shall include the Licence number and the name of the responsible person.
- 2.3.2 Where the controlled activity(ies) has not operated for the duration of any reporting period specified in Schedule 6 the responsible person shall provide written notification to SEPA. This shall confirm that no reports have been made in terms of Condition 2.3.1 because the controlled activity has not operated during said period. Notifications shall be submitted within one month of the end of the reporting period concerned.

## **2.4 Incidents**

- 2.4.1 In the event of an incident, the responsible person shall notify SEPA without delay and in any case by the next working day after identification of the incident, using the contact details in the explanatory notes. This notification shall include: the time and duration of the incident, a description of the cause of the incident, any effect on the environment as a result of the incident and any measures taken to minimise or mitigate the effect and prevent a recurrence.
- 2.4.2 Where requested by SEPA, written report following any incident notified to SEPA should be sent to SEPA at the contact address in the explanatory notes within 14 days of the occurrence of the incident.

## **2.5 Environmental Harm**

- 2.5.1 Other than as specifically permitted or limited by any Condition of this authorisation, the authorised activities shall not have a significant adverse impact on, or cause pollution of, the water environment.

**4 SCHEDULE 4: CONTROL OF THE DISCHARGE OF SOLID WASTE MATTER AND EFFLUENT AND ANY OTHER POLLUTING MATTER INTO THE WATER ENVIRONMENT**

**4.1 Type of Discharge and Fish Species to be Cultured**

4.1.1 The discharge shall be of trade effluent and solid waste matter arising from the farming of Rainbow Trout in cages at the premises.

**4.2 General Condition Controlling the Discharge of Polluting Matter and Effluent**

4.2.1 The discharge shall not contain any matter, other than matter specifically authorised or limited by numeric Conditions in this Licence. Any discharge authorised by this Licence shall protect the water environment and in particular shall not be poisonous, noxious or injurious to the water environment including its natural flora and fauna nor shall it cause damage to the water environment.

**4.3 Feeding Method**

4.3.1 The fish shall be fed by methods that minimise the discharge of waste food.

**4.4 Cage Construction**

4.4.1 The cages shall be maintained in good repair. Flotation blocks made of polystyrene or other materials must be enclosed to prevent them breaking away and being discharged to the water environment.

**4.5 Restriction on Discharge of Dead Fish**

4.5.1 No dead fish arising from the premises shall be discharged to the water environment at any time.

**4.6 Limitation on Discharge Period to Allow Fallowing**

4.6.1 The discharge shall only be made for 12 months in any 16 month period.

**4.7 Requirement to Notify SEPA of the Commencement and Cessation of the Discharge**

4.7.1 The responsible person shall notify SEPA within 14 days of the discharge commencing.

4.7.2 The responsible person shall notify SEPA within 14 days of the cessation of the discharge.

**4.8 Limitation on the Discharge of Medicines and Chemicals**

4.8.1 The medicines/chemicals specified in Table 1 in Appendix 1 may be administered and discharged only in accordance with the Conditions specified in that Appendix.

### **3 SCHEDULE 3: DESCRIPTION OF PREMISES**

#### **3.1 Restriction on Departure from Application and Supporting Information**

- 3.1.1 There shall be no departure from the provisions of the submitted application or from any information or plans accompanying or supplementing the application except insofar as this Licence makes conflicting provision, in which case the Licence provision shall apply.

#### **3.2 Maximum Weight of Stock**

- 3.2.1 The maximum weight of fish held at the premises at any time from which the discharge arises, shall not exceed 455 tonnes.
- 3.2.2 The stock held at the premises shall be held at a density, expressed as kg of fish per cubic metre of water, not exceeding that set out in the submitted application.

## **5 SCHEDULE 5: SAMPLING AND ANALYSIS**

### **5.1 Requirement to Carry Out Monitoring**

- 5.1.1 The responsible person shall carry out monitoring at the premises as specified by SEPA in the Monitoring Protocol Specification reference number MPS CAR/L/1010366 so as to assess the effect of the fish farm discharge on the sediment, the water chemistry and biology of the water environment in the vicinity of the premises.
- 5.1.2 The responsible person shall give not less than 5 working days notice in writing to SEPA advising when the monitoring work is to commence.

### **5.2 Modification of the Monitoring Protocol**

- 5.2.1 The Monitoring Protocol Specification may be modified annually only with the written agreement of SEPA. The modified Monitoring Protocol Specification must be dated and shall clearly state that it replaces and supersedes the previous version.



#### **4.9 Treatment Method**

- 4.9.1 The fish shall be treated by methods that minimise the discharge of medicines and chemicals.

## **6 SCHEDULE 6: RECORDS AND PROVISION OF INFORMATION**

### **6.1 Requirements Regarding the Keeping of Records**

6.1.1 The responsible person shall ensure that the records required by this Licence are:

6.1.1.1 True and accurate.

6.1.1.2 Comprehensible and legible.

6.1.1.3 Recorded as soon as reasonably practicable after each relevant operation.

6.1.1.4 If amended, amended in such a way as to leave the original entry clear and legible.

6.1.1.5 Preserved for 5 years or such other period as SEPA may specify.

### **6.2 Maintenance of Records**

6.2.1 The responsible person shall maintain records of the following information:

6.2.1.1 The location of the cages, the dates when the cages were established at each location and the dates of any commencement or cessation of the discharge.

6.2.1.2 The maximum weight (in tonnes) of fish held on the premises each month.

6.2.1.3 The weight of fish produced, in tonnes per month, including a note of the weight of fish removed from the cages due to mortality, culling or any other reason.

6.2.1.4 The quantity of matter used to feed the fish in tonnes per month and the calculated food conversion ratio over this period.

6.2.1.5 The phosphorus and nitrogen content of the matter used to feed the fish.

6.2.1.6 Details of the use of all medicines and chemicals used to treat the fish (including bath and in-feed application), specifying for each occasion of use the:

- name of the product and its active ingredient;
- quantity of product used;
- date and the period of its use;
- number of cages and the particular stock treated; and
- treated volume relative to the cage volume (for bath treatments only).

6.2.1.7 Details of the methods used to prevent fouling growths on nets. This shall specify the:

- method, date, and location of net cleaning;
- product name and quantity of any applied antifoulant chemical (this must include products applied to new nets and any subsequent re-application);
- name of the net supplier;
- date and location of antifoulant application; and
- date and location when the net was brought into use.

- 6.2.1.8 The results of any surveys or monitoring carried out in accordance with Schedule 5 and the dates when and locations where the said surveys or monitoring were carried out.

### **6.3 Availability of Records**

- 6.3.1 The responsible person shall, at Kames Fish Farming Limited, Loch Etive site, Inverawe, Taynuilt, Argyll PA35 1HU or at a location to be agreed in writing by SEPA make available for inspection, at all reasonable hours, the information specified in 6.2 above.

### **6.4 Provision of Records to SEPA**

- 6.4.1 The responsible person shall provide to SEPA at three monthly intervals or at such intervals as it shall specify or on request from SEPA, a copy of all or any part of the records specified in 6.2 above.
- 6.4.2 The responsible person shall submit to SEPA, within a period of 12 weeks from the date that the surveys or monitoring were carried out, the results of surveys or monitoring carried out in accordance with Schedule 5.

## 7 APPENDIX 1: LIMITATIONS ON THE USE AND DISCHARGE OF MEDICINES AND CHEMICALS FROM THE PREMISES

### 7.1 Medicines and Chemicals

- 7.1.1 The discharge may contain the medicines and chemicals specified in Table 1 only when discharged in accordance with the Conditions below:

Medicine/Chemical Type	Corresponding Abbreviation
Anti-parasitic	AP
Anti-microbial	AM
Anaesthetics	AN
Disinfectants	DN
Anti-foulants	AF

**TABLE 1**

Medicine/ Chemical Type	Trade Name	Active Ingredient	Refer to Conditions of this Appendix
AP	Excis	Cypermethrin	A1.1, A1.2, A1.4, A1.6
AP	Panacur	Fenbendazole	A1.5

### 7.2 Permitted Substances Working Plan

- 7.2.1 In addition to the medicines and chemicals set out in Table 1 above, the discharge may contain the medicines and chemicals set out in the Permitted Substances Working Plan reference number PSWP/CAR/L/1010366 accompanying this Licence provided that the discharge of these medicines and chemicals occurs in accordance with the Conditions specified in the Permitted Substances Working Plan.

### 7.3 Modification of the Permitted Substances Working Plan

- 7.2.2 The Permitted Substances Working Plan may be modified only with the written agreement of SEPA. The modified Permitted Substances Working Plan must be dated and shall clearly state that it replaces and supersedes the previous version.

## **CONDITIONS REFERRED TO IN TABLE 1**

### **Condition A1.1**

This medicine/chemical shall only be discharged following treatment of the fish within an enclosure fully separated from the sea.

### **Condition A1.2**

This medicine/chemical shall only be discharged if the treatment volume provided within the contained enclosure is reduced to less than 30% of the full cage volume in order to minimise the quantity of medicine/chemical discharged following the treatment.

### **Condition A1.3**

This medicine/chemical may be discharged at any time provided that the discharge is in accordance with the Conditions of the Licence and its actual use is recorded and reported in accordance with Schedule 6 of this Licence.

### **Condition A1.4**

This medicine/chemical shall not be discharged from the premises unless the responsible person has given SEPA not less than 2 working days notice of its intended use. Details of its actual use shall be recorded and reported in accordance with Schedule 6 of the Licence.

### **Condition A1.5**

This medicine/chemical shall not be discharged from the premises unless the responsible person has given SEPA not less than 2 working days notice of its intended use and has received approval in writing from SEPA for each specific use or course of treatment. Details of its actual use shall be recorded and reported in accordance with Schedule 6 of this Licence.

### **Condition A1.6**

The total quantity of cypermethrin, as contained in the trade product Excis, discharged in any consecutive 6.25 hour period beginning at the time of the first release of Excis as part of any specific treatment, shall not exceed 12.26 grams (this is equivalent to 1226 millilitres of Excis).

## EXPLANATORY NOTES

(These explanatory notes do not form part of the licence)

### 1. THE WATER FRAMEWORK DIRECTIVE

The Water Framework Directive (WFD) is a wide-ranging piece of European environmental legislation which became law in Scotland at the end of 2003 through the Water Environment and Water Services (Scotland) Act 2003 and in April 2006 through the Water Environment (Controlled Activities) (Scotland) Regulations 2005 (the "Controlled Activities Regulations").

The WFD establishes a legal framework for the protection, improvement and sustainable use of the water environment across Europe by requiring member states to:

- Prevent deterioration and enhance status of aquatic ecosystems, including groundwater;
- Promote sustainable water use;
- Reduce pollution; and
- Contribute to the mitigation of floods and droughts.

The Controlled Activities Regulations establish the regulatory framework for achieving some of the aims of the WFD in Scotland, by creating a regime for authorising "controlled activities", e.g. point source discharges, abstractions, impoundments and engineering activities. They provide for three levels of authorisation, dependent on the risks associated with a controlled activity. A licence is the highest level of authorisation.

Having differing levels of authorisation allows for proportionate and cost-effective controls, so that environmental protection can be achieved whilst minimising the regulatory burden.

### 2. WATER EFFICIENCY

Regulation 6 of the Regulations imposes a general duty to use water efficiently:

*"It shall be the duty of any person carrying out a controlled activity authorised under these Regulations to take all reasonable steps to secure efficient and sustainable water use."*

Water efficiency is the management of the total quantity of water abstracted from a source of supply using measures to minimise wastage, optimise use and reduce consumption.

The means of achieving this can be varied but may include good housekeeping, management systems and procedures, reusing and recycling water and the redesign of operations.

Water audits are the first step to using water efficiently. Water audits develop an understanding of the water system, enable detection of leakages and areas of water wastage and are a means of identifying opportunities for reduced water use.

### **3. APPEALS**

If you are aggrieved by any of the conditions of the licence or the level of authorisation, you may appeal to the Scottish Ministers. Further information on your right of appeal and the appeals procedure is contained in regulations 46 to 49 and Schedule 9 of the Regulations.

Formal notice of appeal under regulation 46(b) or (c) is to be given within three months of the date that the licence is issued. Paragraph 2 of Schedule 9 lists the documents that the appellant has to submit to the Scottish Ministers.

### **4. SUBSISTENCE CHARGES**

An annual subsistence charge may be payable in respect of the licence in terms of the Water Environment (Controlled Activities) Fees and Charges (Scotland) Scheme 2006, copies of which are available from SEPA. Where a subsistence charge is payable, an invoice will be sent to you.

### **5. GENERAL STATUTORY REQUIREMENTS**

A licence under the Controlled Activities Regulations does not disapply any other statutory requirements applicable to the licence holder or his/her operations, such as any need to obtain planning permission or a building warrant, or any responsibilities under legislation for health, safety and welfare in the workplace.

### **6. ADDRESS AND TELEPHONE NUMBERS**

The contact address and telephone number for all information to be reported in terms of the licence, is as follows: -

Scottish Environment Protection Agency  
2 Smithy Lane  
Lochgilphead  
Argyll  
PA31 8TA

During office hours  
Tel No: 01546 602876  
Fax No: 01546 602337  
Out of office hours and public holidays  
Tel No: 0800 80 70 60

### **7. SEPA REVIEW AND VARIATION OF CONDITIONS**

The conditions of the licence will be periodically reviewed by SEPA and may be varied under regulation 19 of the Regulations as a result of that review.

### **8. OPERATOR-INITIATED VARIATION OF CONDITIONS**

The responsible person may apply to SEPA under regulation 21 for a variation of the conditions of the licence.

## **9. TRANSFER OF AUTHORISATION**

A responsible person may apply to transfer the licence to another person under regulation 22 by making a joint application with the other person.

## **10. SURRENDER OF AUTHORISATION**

Where the controlled activities authorised by the licence have ceased, or it is intended that the controlled activities will cease, the responsible person may apply to SEPA to surrender the licence under regulation 24.

## **11. SUSPENSION AND REVOCATION OF AUTHORISATION**

SEPA may at any time suspend or revoke an authorisation (in whole or in part) by serving a notice on the responsible person under regulation 26.

## **12. ENFORCEMENT NOTICES**

Where SEPA is of the opinion that an activity

- a) has contravened, is contravening or is likely to contravene any condition of the licence or
- b) has caused, is causing or is likely to cause significant adverse impacts on the water environment or
- c) has caused, is causing or is likely to cause a direct or indirect discharge into groundwater of substances listed in Schedule 2 of the Regulations

SEPA may serve an enforcement notice on the responsible person under regulation 28.

This notice will specify the steps to be taken by the responsible person which SEPA considers to be necessary or appropriate to prevent, mitigate or remedy the contravention, the impact on the environment or the discharge into groundwater.

## **13. OFFENCES**

It is an offence to carry on, or cause or permit others to carry on, any controlled activity except insofar as it is authorised under the Regulations and carried on in accordance with that authorisation.

It is an offence to fail to comply with or contravene, or cause or permit others to fail to comply with or contravene, a water use licence, including any condition imposed.

It is an offence to fail to comply with, or cause or permit others to fail to comply with, the requirements of an enforcement notice.

It is an offence to intentionally make, or cause or permit others to make, a false entry in any record required to be kept under a condition of an authorisation.

Further details on these and other offences and on penalties liable to be imposed upon conviction for an offence are provided in regulation 40 of the Regulations.

Directors, managers and other individuals within a company may be held personally liable for offences under the Regulations.



All personnel who are responsible for fulfilling any condition of the licence should be made aware of these facts.

Please note that your licence authorises you to carry out the activity or activities outlined in your application to SEPA in accordance with the licence and its conditions. Be aware however, that any activity outwith the terms of the licence is prohibited under regulation 5 of the Regulations. Should you undertake any activity which does not conform to the terms of your licence, you may be subject to criminal proceedings in accordance with regulation 40(1)(a) of the Regulations. This prohibition encompasses any 'accidental' activity which is liable to cause pollution of the water environment, as "activities liable to cause pollution of the water environment" are controlled activities within the definition of section 20 of the Water Environment and Water Services (Scotland) Act 2003, even if SEPA would not grant an authorisation for such an activity.

The statutory definition of pollution, as set out in that section, is as follows:-

*"Pollution", in relation to the water environment, means the direct or indirect introduction, as a result of human activity, of substances or heat into the water environment, or any part of it, which may give rise to any harm, and "harm" means –*

- (a) harm to the health of human beings or other living organisms,*
- (b) harm to the quality of the water environment, including-*
  - (i) harm to the water environment taken as a whole,*
  - (ii) other impairment of or interference with, the quality of aquatic ecosystems or terrestrial ecosystems directly depending on aquatic ecosystems,*
- (c) offence to the senses of human beings,*
- (d) damage to property, or*
- (e) impairment of, or interference with, amenities or other legitimate uses of the water environment.'*



# Procedure

Tarp treatments for delousing at Etive



December 18, 2015  
Authored by: Berta Rivera

## **PURPOSE**

The purpose of this document is to describe how fish must be bath treated using a tarpaulin at Etive, including an Appendix for the use of different delousing chemicals, special precautions needed for use, special warnings and emergency procedures.

The objective is to ensure the highest quality of the treatment, and lowest levels of stress on the fish, and to thereby reduce incidence of mortality during the treatment.

## **SCOPE**

This S.O.P. applies whenever Dawnfresh Farming fish are treated against sea lice using tarpaulins.

## **REFERENCES**

Etive Sepa licence documents.  
Chemicals COSHH sheet and MSDS sheet.  
Procedure for Carrying out Sea lice Counts (DFF10014).  
Procedure for Crowding fish at Etive (PRO-041).  
Procedure for using the crane.  
Bath treatments database.

## **DEFINITION**

NetOx: diffuser for oxygen enrichment in aquaculture cages.  
Tarpaulin: large sheet of strong, flexible, water-resistant or waterproof material.

## **RESPONSABILITIES**

It is the responsibility of the site manager to ensure that this operation is carried out and that all staff carrying it out is suitably trained and competent in the tasks required.  
It is the responsibility of the team leader to carry out the task following this procedure.  
It is the responsibility of the operatives to carry out their roles following the procedures laid down.

### **Training**

Members of the team must be trained in using tarpaulins and netOx equipment or any other diffuser for oxygen enrichment as well as how to administer the chemical and the use of the appropriate PPE for it. All staff will be aware of the COSHH file and MSDS records of all the products used in the treatment.

All members must have read and understood. "Procedure – Tarp treatments for delousing at Etive"

## **PROCEDURE**

### **Prior to start**

1. The treatment has to be previously discussed with the Fish Health Manager, agreeing the chemical to be used and the cages or sites that has to be prioritized for the treatment.

2. Products will only be used following a veterinary prescription and written direction (dose, withdrawal period...).
3. Whenever a treatment is planned to be done, it is required to notify SEPA no less than 2 working days before it's used.
4. The person responsible of the fish health during the treatment has to be sure prior to start with it which chemical is going to be used (see specific chemical information on appendix 1 and 2), the dose, time and the discharge consent on the site (ETIVE SEPA license documents). The water volume to be treated has to be calculated as exactly as possible to ensure a correct dosing.
5. Make sure that the pens to be treated have clean nets.
6. It is important to know the fish health status of the fish to be treated, including their gills, and the environmental parameters (temperature, salinity, oxygen...), as well as the fish size and the biomass.
7. Ensure that enough oxygen is on site and that the oxygen system supplies enough O<sub>2</sub>. This will be case specific and will depend on temperature, fish size and biomass. See appendix 3 to calculate oxygen needs.
8. Ensure the correct starvation period of the fish to be treated. The fish should be starved for minimum 48h. This could be discussed with the Fish Health Manager.
9. Lice counts have to be performed before the treatments in order to be able to assess the efficacy of them.
10. A mortality removal plan has to be established previously to the treatment. It can be expected large mortalities following the treatments and these have to be removed as soon as possible. Divers should be booked for the following day.
11. Ensure that the correct safety PPE to perform the treatment is available on site and that there is enough for all the staff that will participated on it (nitrile gloves, face mask and waterproofs).
12. At least 2 oxygen meters would be needed. These ones should be checked previously ensuring their proper functioning and calibration.
13. Check that the weather conditions and tides are suitable and postpone the treatment if not.
14. Full tarpaulins have to be used. Ensure the tarpaulin is clean and in good repair.
15. Ensure at least two work boats are available to coordinate the treatment. One with the dosing system, oxygen system and compressor, and another with the tarpaulin. Ideally another work boat will be available to with the tarpaulin and lifting the net.
16. Ensure a minimum of 6 staff are available for each treatment (this includes the boat crew).

### **Procedure**

See procedures for “Crowding Fish Etive” and for “using a crane”.

1. Set up the Oxygen system (NetOx) and turn the oxygen on before introducing the pipes into the water to prevent the entrance of water into the system.
2. Deploy air pipes into the cage. With the aid of ropes the oxygen pipes should be evenly dispersed within the pen. Introduce the oxygen meter into the cage and monitor. A member of the staff will be in charge of monitoring the oxygen throughout the whole procedure and will adjust the oxygen supply as require. The oxygen should never be below 7mg/l and if that is the case the procedure will be terminated.

3. Lift the weights of half of the pen, leaving them on the walk way and raise the net all the way up to the cone.
4. The boat with the tarpaulin is situated against the current to ensure the proper fill up of the tarpaulin. Start introducing the tarpaulin into the water on the site of the pen that has been lifted.
5. Secure the tarpaulin under and around the cage and tie off above the water line. Drop the weights to reduce bagging in the net.
6. Proceed in the same way with the other half of the pen, lifting the rest of the weights and raising the rest of the net.
7. Finish tying off the tarpaulin above the water line and when this is done drop the weight inside the tarp.
8. When finishing putting the tarpaulin make sure the right amount of chemical has been introducing in the dosing system using the appropriate PPE.
9. Turn the compressor on.
10. As soon as the person in charge of the tarpaulin gives the sign, the chemical can be released into the pen.
11. The person in charge of the fish health and oxygen monitoring will make notes of the time when the chemical has been added and how long has it take to release the wanted amount of chemical. The treatment time will start as soon as all the chemical has been added. See the treatment times on the appendixes.
12. The fish health observer will check the fish during the whole procedure. During the treatment special attention is required. If the fish show any symptom of overdose (gasping for air, equilibrium problems...), or if there is insufficient oxygen, the treatment should be terminated.
13. As soon as the treatment is completed, untied the tarp and start removing it.
14. Keep the oxygen system in the cage on until the fish are settled. It may also be necessary to flush the chemical out of the cage by leaving the compressor on for another 10-20 min. This is especially important in the case of dirty nets, to avoid and extended exposure to the chemical after leaving the pen, which can lead to an overdose.
15. In case of having low Oxygen levels in the environment keep the oxygen system on for a longer period of time. Try to reduce it slowly back to the environmental oxygen level to avoid big oxygen changes.
16. Oxygen, chemical diffuse system and compressor can now be recovered and the workboat can move to the next pen.
17. Lice counts have to be done 2-4 days post treatment to see the clearance and therefore the efficacy of the treatment.
18. The fish health observer has to include all the treatment details into the “bath treatment database” and send an email sharing the information with key people.
19. The fish health observer has to include the treatment in Aqua Farmer.

## APPENDIX 1

### **ALPHAMAX INFORMATION AND SPECIAL WARNINGS**

AMX 10 mg/ml Concentrate for solution for fish treatment is the name of the veterinary medicinal product in UK and the active substance is Deltamethrin 10 mg/ml. It is an ectoparasiticide for topical use that belongs to the pyrethroids pharmacotherapeutic group.

The target fish species for AMX are Atlantic salmon (*Salmo salar*) and rainbow trout (*Oncorhynchus mykiss*) and has been indicated to use it for treatment of adult and preadult sea lice (*Lepeophtheirus salmonis*) on those two fish species.

Fish with infectious diseases should not be treated with AMX as treatment against sea lice may aggravate the clinical signs and increase the mortality.

#### Special warnings

- The efficacy of this medicinal product declines with water temperatures below 6°C.
- Avoid treatment if large amounts of organic material are present in the sea water or if the sea-cage is overgrown, as this may reduce the efficacy of the treatment.
- Alpha Max does not prevent reinfestation with sea lice after treatment.
- Suboptimal treatment regimen and frequent treatments as well as the use of pyrethroids only for sea lice treatment, can induce reduced sensitivity in the sea lice with lack of efficacy as a possible consequence.

#### Special precautions for use

- All fish should be oxygenated during treatment. Ensure that the oxygen level is above 7 mg/l before the treatment is initiated and that it is kept above 7mg/l during the entire duration of the treatment.
- At water temperatures below 6°C the product's safety margin is reduced.
- Overgrowth of algae on the sea-cages/nets may prevent water exchange after treatment. This may extend the exposure period and increase the risk of intoxication of the fish.
- Treatment should not be carried out unless some degree of water current is present. Without a current the exposure period may be extended and increase the risk of overdosing

#### Withdrawal period

5 degree days for treated rainbow trout

Treatment period: 30 minutes

#### Treatment dose

0.2 ml Alpha Max per m<sup>3</sup> (1000 l) of sea water in the treatment unit. This corresponds to 2microgram deltamethrin/litre sea water.

In this case the treatment unit will be the tarpaulin and the dosage is calculated according to the actual volume of the tarpaulin.

## APPENDIX 2

### **SALMOSAN INFORMATION AND SPECIAL WARNINGS**

Salmosan is the name of the Veterinary medical product. It is presented as a powder for suspension for fish treatment containing 50% w/w azamethiphos. It is an organophosphorus insecticide, acting by anticholinesterase activity.

The target specie is only farmed Atlantic salmon (*Salmo salar*) and has been indicated for the control of mature pre- adults to adult sea-lice of *Lepeophtheirus salmonis* or *Caligus* species.

#### Special warnings

- If signs of distress, e.g., fish falling on their side, occur after 30 minutes of treatment, remove the tarpaulin and ensure vigorous oxygenation of the water.

#### Special precautions for use

- At water temperatures above 10°C it is advisable to limit treatment periods to 30 minutes. Vigorous oxygenation of the water must be provided during treatment.
- Special precautions for the person administering the veterinary medicinal product to animals.
- Poisoning from organophosphorus compounds results from blockage of acetylcholinesterase, with a resultant over- activity of the acetylcholine. Blood samples should be taken prior to use it and after every exposure.

#### Withdrawal period

500 degree days for treated rainbow trout

Treatment period: not less than 30 minutes and not more than 60 minutes. At water temperatures above 10°C it is advisable to limit treatment periods to 30 minutes.

#### Treatment dose

To achieve a final concentration of 0.1 ppm azamethiphos, 0.2g of Salmosan powder must be added per cubic metre of water.

#### **Wear suitable protective clothing, suitable protective gloves and face protection**

Once the salmosan is diluted, not more than 48 hours can pass prior to treatment.

## APPENDIX 3

**OXYGEN SUPPLY**

During the whole procedure the oxygen must be monitored and extra oxygen has to be added into the treatment unit in order to keep optimal oxygen levels, which must be over 7 mg/l during the whole procedure.

Several things have to be considered when calculate oxygen needs (i.e. fish size, temperature, biomass treated, stress, starvation...).

**Table 1. Shows the basic oxygen consumption in kg of oxygen/ h per 100 tonnes.**

Oxygen consumption* vs. fish size and water temperature								
Weight	Water temperature °C							
gram	2	4	6	8	10	12	14	16
100	3,7	7,4	11,1	14,8	18,5	22,3	26,0	29,0
200	3,3	6,5	9,8	13,1	16,4	19,6	22,9	26,2
300	3,1	6,1	9,1	12,2	15,2	18,2	21,3	24,4
400	2,9	5,8	8,6	11,6	14,5	17,3	20,2	23,1
500	2,8	5,6	8,3	11,1	13,9	16,7	19,4	22,2
1000	2,5	4,9	7,4	9,8	12,4	14,7	17,2	19,6
2500	2,1	4,1	6,2	8,3	10,4	12,5	14,5	16,6
5000	1,9	3,7	5,5	7,3	9,2	11,0	12,8	14,7
Oxygen consumption of salmon, given in kilos of oxygen per 100 tonnes of salmon per hour, according to fish size and temperature								

**Things to take into account:**

- Estimate the biomass and the average fish weight in the cage.
- Measure the water temperature in the middle of the water column that will be oxygenated.
- Well starved fish need up to 50% less oxygen than newly fed fish.
- Stress on the fish may increase the oxygen consumption by a factor of three.

Calculate the oxygen requirement in the cage and make sure that the oxygen tank is in place and there is a sufficient reserve of oxygen for the whole operation. Make sure that the equipment used for the treatment is capable of delivering the necessary amount of oxygen.



## Standard Operating Procedure for Bath Treatments on Wellboat

1. Ship shall be cleaned and disinfected as per requirements for area and previous operations according to industrial cleaning procedure.  
Recent preparations of the pyrethroids, organophosphates and H<sub>2</sub>O<sub>2</sub> drug doses and administration time shall be indicated on the prescription provided with medication (trace data sheet).
2. Fish must be starved long enough so the water does not become contaminated by excrement or anything that degrades water quality and may inactivate bathing funds.
3. Use the boat's maximum equipment to ensure sufficient Dissolved Oxygen during treatment (lowest level of Dissolved Oxygen during treatments is > 7mg / l)
4. Greater care and careful judgment must be used in the handling of fish at low and high temperatures.
5. When the fish to be treated are loaded into the boat, external water exchange must run at maximum for at least 10 minutes. This is to ensure the reduction of excrement or anything which degrades the water and may inactivate treatment.
6. It is paramount that only essential personnel are involved in the treatment procedure.  
There must be a clear indication of who is responsible for all tasks and procedures, this must be established prior to loading.  
Crew must be extra vigilant to ensure that all systems are functioning correctly, i.e. that all relative valves are open/closed, pumps running. Crew must remain vigilant throughout the treatments.
7. Bath treatment of fish is a large and demanding task. This applies to both the boat and cages so it is essential to double check that all involved personnel have adequate training. Correct Health & Safety Procedures are also key to success in this same operation.
8. When handling the bathing medium, it is important to avoid skin contact with drug use and suitable protective clothing such as gloves, goggles, facemask when mixing and dosing of the product.
9. Record of water quality parameters shall be submitted to the fishfarm after finishing treatments.
10. Wellboat Circulation procedure is as follows.
  - When the fish are loaded, the DO<sub>2</sub> must first be checked to ensure that it is safe to proceed with treatments.
  - When there is consensus between the Fishfarm Person in Charge and the Wellboat Bridge that the treatment may proceed the Circulation Pumps are changed from open circulation to closed circulation (great care must be taken to assure the water level in the tank is pressed full as a lower level can cause foaming which may affect the treatment).

- Pumps valves to be changed are starboard 700m3, port 700m3, starboard 350m3 and port 350m3.
- Only when it is confirmed that the pumps are all on closed circulation will the Hull Doors be closed.
- Before medicine is dosed there must be positive reporting from the bridge. It must never be assumed that systems are ready until this occurs. The same applies to communication between the person in charge of changing circulation and the bridge. There must always be positive reporting between personnel.

11. When it is confirmed that the tank is ready for dosing the agreed time must be double checked. It is the responsibility of the fishfarm management to ensure the correct amount of dose is used. This however must be agreed and clarified previously with the Wellboat Bridge. There will be two personnel responsible for the administration, one from the fishfarm and another from the wellboat. Both must witness and agree to the measurement of dosage. This safety procedure must be vigilantly applied.  
There must also be two people responsible for the timing of the treatments. This is also logged in the ships log.
12. At any time the Wellboat operators, Fishfarm Person in Charge or any Authorised Authority have the right to abandon the treatment if there is a concern for the welfare of the fish.
13. When the time has elapsed circulation is changed from closed to open and the fish may be immediately unloaded to the pen. Careful observation of all water parameters is maintained throughout.

.....  
Signature Master

.....  
Signature of Fishfarm Person in Charge

Date:

## Millar P (Peter)

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**From:** Peter MacDougall <Peter.MacDougall@dawnfresh.co.uk>  
**Sent:** 12 September 2017 16:52  
**To:** Irvine S (Sophia)  
**Subject:** RE: Wellboat Licence Applications  
**Attachments:** Airds Point Wellboat Application Amended.pdf

Please see the amended form attached.

Best regards

Peter

---

**From:** Sophia.Irvine@gov.scot [mailto:Sophia.Irvine@gov.scot]  
**Sent:** 08 September 2017 16:05  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Great thank you for sending that over. I have also just noticed the Scottish National Marine Plan has not been considered for the Airds Point, Loch Etive site.

If you could take this into consideration, similar to your other application and send me the updated application form for Airds Point, that would be much appreciated.

Many thanks in advance.

Kind regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Email: [sophia. Irvine@gov.scot](mailto:sophia. Irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 08 September 2017 15:09  
**To:** Irvine S (Sophia)  
**Subject:** RE: Wellboat Licence Applications

Hi Sophia,

Sorry, just a typo!  
It should be

- Port na Mine, Loch Etive – 56 26.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Thanks

Peter

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**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]

**Sent:** 08 September 2017 14:47

**To:** Peter MacDougall

**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Thank you for sending over the co-ordinates. I have done an initial co-ordinate check and for the Port na Mine, Loch Etive site the co-ordinates seem to be wrong. Please see link below:

- <http://gridreferencefinder.com/?gr=NN0350536835|56.4825 s c s -5.1926|1&v=h>

If would be grateful if you could please send the correct co-ordinate for this site at your earliest convenience. If you have any questions please let me know.

Kind regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]

**Sent:** 06 September 2017 15:33

**To:** Irvine S (Sophia)

**Subject:** RE: Wellboat Licence Applications

Apologies Sophia,

- Port na Mine, Loch Etive – 56 28.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Regards

Peter

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**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]

**Sent:** 05 September 2017 10:12

**To:** Peter MacDougall

**Subject:** RE: Wellboat Licence Applications

Dear Peter,

I have reviewed your Wellboat Licence Applications in respect of the below sites and have noticed you have provided four co-ordinates for each site. For Wellboat applications we require only one co-ordinate which is representative of the middle of the site. I should be grateful if you could provide these co-ordinates for the below sites in order to continue processing your applications.

- Port na Mine, Loch Etive
- Airds Point, Loch Etive

Please also note for any future applications, we do not accept payment prior to an invoice being raised. Once an application has been reviewed it is assigned a unique reference number which helps locate the funds when they have been transferred. Paying prior to an invoice being raised often leads to a significant delay in the process by trying to locate funds.

Many thanks in advance.

Kind Regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Fax: +44 (0)1224 295 524

Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]

**Sent:** 30 August 2017 17:15

**To:** MS Marine Licensing

**Subject:** Wellboat Licence Applications

Good afternoon,

Please find attached two applications for Wellboat Licences for the Port Na Mine and Airds Point fish farms. Payment of the appropriate fee has requested by bank transfer and this will be completed tomorrow, 31<sup>st</sup> August. Please see attached notice of the impending payment.

Should you require any further information for either application please don't hesitate to contact me directly

Best regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*  
**T:** [REDACTED]

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Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

## **Marine Licence Application for Discharge of Treatment Agents from a Wellboat**

Version 1.0

### **Marine (Scotland) Act 2010**

## Acronyms

Please note the following acronyms referred to in this application form:

<b>BPEO</b>	Best Practicable Environmental Option
<b>CAR</b>	Controlled Activities Regulations
<b>MHWS</b>	Mean High Water Springs
<b>MPA</b>	Marine Protected Area
<b>MS-LOT</b>	Marine Scotland – Licensing Operations Team
<b>SAC</b>	Special Area of Conservation
<b>SEPA</b>	Scottish Environment Protection Agency
<b>SNH</b>	Scottish Natural Heritage
<b>SPA</b>	Special Protection Area
<b>SSSI</b>	Site of Special Scientific Interest
<b>WGS84</b>	World Geodetic System 1984

## Explanatory Notes

The following numbered paragraphs correspond to the questions on the application form and are intended to assist in completing the form. These explanatory notes are specific to this application and so you are advised to read these in conjunction with the Marine Scotland Guidance for Marine Licence Applicants document.

### **1. Applicant Details**

The person making the application who will be named as the licensee.

### **2. Agent Details**

Any person acting under contract (or other agreement) on behalf of any party listed as the applicant and having responsibility for the control, management or physical deposit or removal of any substance(s) or object(s).

### **3. Payment**

Indicate payment method. Cheques must be made payable to: The Scottish Government.

**Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.**

### **4. Application Type**

Indicate if the application is for a new wellboat discharge site or an existing wellboat discharge site. Provide the existing or previous consent/licence number and expiry date if applicable.

### **5. Marine Farm**

Indicate if you have a consent/licence for the marine farm where proposed treatment agent discharge is to take place and provide the consent/licence number and expiry date for the marine farm.

**Marine licence applications for discharge of treatment agents from a wellboat will not be determined without a valid marine licence for the marine farm.**

### **6. Wellboat Discharge Details**

- (a) Give a brief description of the discharge including rationale for discharge.
- (b) Provide the proposed start date of the project. The start date will not be backdated, since to commence a project for which a licence has not been obtained will constitute an offence, which may result in appropriate legal action. A licence is normally valid for the duration of the project but not exceeding 3 years. If a project will not be completed before a marine licence lapses, it will be necessary for licence holders to re-apply for a further licence to continue any ongoing work at least 14 weeks prior to the expiry date of the licence. **Target duration for determination of a marine licence application is 14 weeks.**



- (c) Provide the proposed completion date of the project.
- (d) Describe the location of the proposed works. Include a list of the latitude and longitude co-ordinates (WGS84) of the site where discharge will take place. WGS84 is the World Geodetic System 1984 and the reference co-ordinate system used for marine licence applications. Co-ordinates taken from GPS equipment should be set to WGS84. Coordinates taken from recent admiralty charts will be on a WGS84 compatible datum. Ordnance survey maps do not use WGS84.

**Example:** For positions read from charts the format should be as in the example: 55°55.555'N 002°22.222'W (WGS84). The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the format should be as in the example: 55°55'44"N 2°22'11"W (WGS84).

**It is important that the correct positions, in the correct format, are included with this application, as any errors will result in the application being refused or delayed.**

To supplement your application, please provide a suitably scaled extract of an Ordnance Survey Map (1:2,500 scale but not more than 1:10,000) or Admiralty Chart which must be marked to indicate:

- the discharge site and associated marine farm;
- latitude and longitude co-ordinates defining the location of the works;
- the level of MHWS;
- any adjacent SAC, SPA, SSSI, MPA, Ramsar or similar conservation area boundary.

Drawings and plans will be consulted upon. If they are subject to copyright, **it is the responsibility of the applicant to obtain necessary approvals to reproduce the documents and to submit suitably annotated copies with the application.**

- (e) Provide details of the water depth at the discharge site in metres and the distance of the discharge site from land in metres or kilometres.
- (f) Indicate if the discharge site is located within the jurisdiction of a statutory harbour authority and provide details of the statutory harbour authority where relevant.
- (g) Provide assessment of the potential impacts the works may have, including interference with other uses of the sea. Please include details of areas of concern e.g designated conservation areas, such as a SAC, SPA, SSSI, MPA or Ramsar site and shellfish harvesting areas. Further guidance on designated conservation areas can be obtained from SNH at this website: <http://gateway.snh.gov.uk/sitelink/index.jsp> and guidance on shellfish harvesting areas can be obtained from <http://www.foodstandards.gov.scot/> with regards to the Shellfish Waters Directive (2006/113/EC) which has parameters set to protect the water quality in which edible shellfish are grown.

Where there are potential impacts from the works, please provide details of proposed mitigation in response to potential impacts.

## **7. Details of Treatment Agent(s) to be Discharged**

Provide the proprietary name(s) of all treatment agents (e.g. Excis), the chemical name(s) or other relevant description(s) of all chemicals (e.g. Cypermethrin) and provide all appropriate Material Safety Data Sheets.

Under section 27(2) of the Marine (Scotland) Act 2010, the licensing authority has an obligation to consider the availability of practical alternatives when considering applications involving disposal of substance(s) or object(s) at sea. All applications for sea disposal must be supported by a detailed assessment of the alternative options - BPEO assessment. This must include a statement setting out the reasons why deposit of the substance(s) or object(s) at sea is the preferred option and applications will not be considered unless they are accompanied by such an assessment. All options in the BPEO must be explored fully (as per the guidance documents) otherwise your form and BPEO are liable to be returned to you, thereby delaying processing of the application.

## 8. Details of Discharge

For each treatment agent deposit listed in section 7 provide the date of discharge (wherever possible approximate date of discharge must be provided); duration of discharge in minutes (the estimated duration that the treatment agents being discharged are likely to be detectable/active in the water column); weight/volume of the treatment agent in grams/cubic metres (the discharge dose of each agent, including post treatment if required); and the total volume of the treatment agent (the total volume to be discharged from each vessel and also the number of wells in each vessel to be used during the procedure).

## 9. Details of Discharge Procedure

For each treatment agent deposit listed in section 7 provide the method of deposit (e.g gravity, discharge pump); the mode of deposit (e.g through a pipeline, valve, diffuser, bucket); the depth of deposit (e.g sea surface, subsurface with depth in metres); and the rate of deposit (e.g discharge rate – litres or m<sup>3</sup> per second, minute or hour. This must be given for each well).

## 10. Details of Vessel(s) Undertaking Discharge

Provide the name and call sign, if appropriate, of each of the vessels involved in the procedure. It is understood that vessel availability issues often lead to changes over small time scales to vessel choice. Please be as exhaustive as possible in the list of vessels that may be used to reduce the need for further administrative changes and continue on a separate sheet if necessary.

## 11. Scotland's National Marine Plan

Scotland's National Marine Plan has been prepared in accordance with the EU Directive 2014/89/EU, which came into force in July 2014. The Directive introduces a framework for maritime spatial planning and aims to promote the sustainable development of marine areas and the sustainable use of marine resources. It also sets out a number of minimum requirements all of which have been addressed in this plan. In doing so, and in accordance with article 5(3) of the Directive, Marine Scotland have considered a wide range of sectoral uses and activities and have determined how these different objectives are reflected and weighted in the marine plan. Land-sea interactions have also been taken into account as part of the marine planning process. Any applicant for a marine licence should consider their proposals with reference to Scotland's National Marine Plan. A copy of Scotland's National Marine Plan can be found at: <http://www.gov.scot/Publications/2015/03/6517/0>

Indicate whether you have considered the wellboat discharge with reference to Scotland's National Marine Plan and provide details of considerations made including reference to the policies that have been considered. If you have not considered the project with reference to Scotland's National Marine Plan please provide an explanation.

## 12. Consultation

Provide details of all bodies consulted and give details of any consents issued including date of issue.

## 13. Associated Works

Indicate whether the application is associated with any other marine projects (e.g. marine farm installation etc). If this is the case, provide reference/licence number for the related marine projects.

# Marine Licence Application for Discharge of Treatment Agents from a Wellboat

Version 1.0

## Marine (Scotland) Act 2010

It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.

Under Section 54 of the Marine (Scotland) Act 2010, all information contained within and provided in support of this application will be placed on a Public Register. There are no national security grounds for application information not going on the Register under the 2010 Act

### Public Register

Do you consider that any of the information contained within or provided in support of this application should not be disclosed:

(a) for reasons of national security; YES ☐ NO ☒

(b) for reasons of confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate commercial interest? YES ☐ NO ☒

If **YES**, to either (a) or (b), please provide full justification as to why all or part of the information you have provided should be withheld.

## WARNING

It is an offence under the Act under which this application is made to fail to disclose information or to provide false or misleading information.

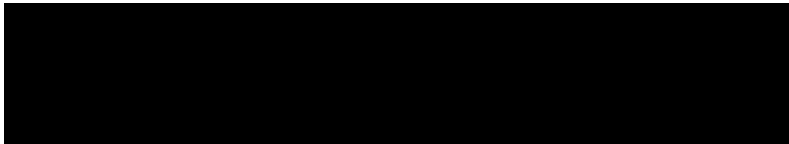
Target duration for determination is 14 weeks. Please note that missing or erroneous information in your application and complications resulting from consultation may result in the application being refused or delayed.

Marine licence applications will not be accepted unless accompanied by a cheque for the correct application fee, or if an invoice is requested, until that invoice is settled. Target timelines for determining applications do not begin until the application fee is paid.

### Declaration

I declare to the best of my knowledge and belief that the information given in this form and related papers is true.

Signature



Date

28/08/17

Name in BLOCK LETTERS

PETER MACDOUGALL

### Application Check List

Please check that you provide all relevant information in support of your application, including but not limited to the following:

- Completed and signed application form ☒
- Maps/Charts ☒
- Co-ordinates of the boundary points of the area of harbour jurisdiction (if you are a statutory harbour authority) ☐
- BPEO Assessment ☒
- Material Data Sheets for all treatment agents applied for ☒
- A copy of the CAR licence issued from SEPA ☒
- Standard Operating Procedure providing details of the proposed procedure for discharge of all treatment agents applied for ☒
- Additional information e.g. consultation correspondence (if applicable) ☐
- Payment (if paying by cheque) ☐

### 1. Applicant Details

Title: Initials: Surname:

Trading Title (if appropriate): Dawnfresh Farming Ltd

Address: Bothwellpark Industrial Estate, Uddingston, Lanarkshire, G71 6LS

Name of contact (if different): Peter MacDougall

Telephone No. (inc. dialing code):

Email: peter.macdougall@dawnfresh.co.uk

Statutory Harbour Authority? YES ☐ NO ☒

If **YES**, please provide a list of the latitude and longitude co-ordinates (WGS84) of the boundary points of the area of harbour jurisdiction using Appendix 01 Additional Co-ordinates form if necessary.

### 2. Agent Details (if any)

Title: Initials: Surname:

Trading Title (if appropriate):

Address:

Name of contact (if different):

Telephone No. (inc. dialing code):

Email:

### 3. Payment

Enclosed Cheque ☒ Invoice ☐

Contact and address to send invoice to:

Applicant ☒ Agent ☐ Other ☐

If **OTHER**, please provide contact details:

Title: Initials: Surname:

Address:

Email:

#### 4. Application Type

Is this application for a new wellboat discharge site or an existing wellboat discharge site:

New Site ☒ Existing Site ☐

If an **EXISTING SITE**, please provide the consent/licence number and expiry date:

Consent/Licence Number	Expiry Date

#### 5. Marine Farm

Do you have a consent/licence for the marine farm where proposed treatment agent discharge is to take place?

YES ☒ NO ☐

If **YES**, please provide the consent/licence number and expiry date:

Consent/Licence Number	Expiry Date
05259/14/0	24th July 2020
CAR/L/1018068	

#### 6. Wellboat Discharge Details

(a) Brief description of the discharge including rationale for discharge:

Discharge of water and chemical product following treatment of farmed fish for sea lice. Wellboat treatment can be necessary as an alternative sea lice treatment in certain weather and fish health conditions.

(b) Proposed start date (**Target duration for determination of a marine licence application is 14 weeks**):

asap

(c) Proposed completion date:

Ongoing

(d) Location:

The location of the discharge will be at the cage edge of the Airds Point fish farm in Loch Etive

Latitude and Longitude co-ordinates (WGS84) defining the proposed discharge point (continue on Appendix 01 Additional Co-ordinates form if necessary):

Latitude										Longitude									
5	6	°	2	7	.	2	3	0	' N	0	0	5	°	1	5	.	5	0	' W
5	6	°	2	7	.	2	0	0	' N	0	0	5	°	1	5	.	5	9	' W
5	6	°	2	7	.	3	3	0	' N	0	0	5	°	1	5	.	7	4	' W
5	6	°	2	7	.	3	6	0	' N	0	0	5	°	1	5	.	6	5	' W

(e) Water depth and distance from land:

Water Depth (metres)	Distance from Land (metres/kilometres)
30m	100m

(f) Is the discharge site located within the jurisdiction of a statutory harbour authority?

YES ☐ NO ☒

If **YES**, please specify statutory harbour authority:

(g) Potential impacts the works may have (including details of areas of concern e.g. designated conservation and shellfish harvesting areas) and proposed mitigation in response to potential impacts (continue on separate sheet if necessary):

Discharges from wellboats will be in line with the consented medicines permitted by the CAR Licence for this site. Modelling of the site has been carried out and consented through the CAR licence regulatory regime and are not expected to present any increased environmental impact.

**7. Details of Treatment Agent(s) to be Discharged** (Please provide Material Safety Data Sheets for each chemical to be discharged).

Proprietary Name of Treatment Agent(s)	Chemical Name of Treatment Agent(s)
A phamax	De tamether n
Paramove	Hydrogen Perox de
Sa mosan/Sa mosan Vet/Azasure	Azameth phos
Ex s	Cypermethr n

**8. Details of Discharge** (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Date of Discharge (approx.)	Duration of Discharge (minutes)	Weight/Volume of Agent (grams/cubic metres)	Total Volume (including solvent) (cubic metres)
1	As required	As per CAR Licence	As per CAR Licence	As per CAR Licence
2				
3				
4				
5				

**9. Details of Discharge Procedure** (Please provide details for each of the deposits listed in Section 7 above):

Deposit	Method of Deposit	Mode of Deposit	Depth of Deposit (metres)	Rate of Deposit (litres or cubic metres per second/minute/hour)
1	Discharge Pump	Valve	4m	2,500m3/hr
2	Discharge Pump	Valve	4m	3,900m3/hr
3				
4				
5				

**10. Details of Vessel(s) Undertaking Discharge** (continue on a separate sheet if necessary):

Vessel Name	Registration Details/Call Sign (if appropriate)	Name and Address of Operator
Solondoy	EI 7195 / IMO No. 9158654	Johnson Marine, Marine Park, Vidlin, ZE2 9QB
Viking Caledonia	2JBO3 / IMO No. 9125188	Johnson Marine, Marine Park, Vidlin, ZE2 9QB
Viking Atlantic	3YIW / IMO No. 9167954	Johnson Marine, Marine Park, Vidlin, ZE2 9QB



Norholm	2BVA2 / IMO No. 9139567	North Isles Marine Ltd. Kletttrlea, Burravoe, Yell, Shetland, ZE2 9BA
Settler	2JCE9 / IMO No. 9258703	North Isles Marine Ltd. Kletttrlea, Burravoe, Yell, Shetland, ZE2 9BA

#### 11. Scotland's National Marine Plan

Have you considered the application with reference to Scotland's National Marine Plan?

YES ☒ NO ☐

If **YES**, provide details of considerations made including reference to the policies that have been considered:

Aquaculture 11: Using wellboat treatments allows treatments to be carried out in a wider range of weather conditions when it is not always preferable to use a tarpaulin treatment. This licence will allow flexibility to undertake the most appropriate method of treatment for the conditions experienced.

If **NO**, please provide an explanation of why you haven't considered the National Marine Plan?

**12. Consultation**

List all bodies you have consulted and provide copies of correspondence:

Consultation with conservation bodies was undertaken at the time of determination of the SEPA CAR Licence

**13. Associated Works**

Provide details of other related marine projects, including reference/licence numbers (if applicable):

## Millar P (Peter)

---

**From:** Peter MacDougall <Peter.MacDougall@dawnfresh.co.uk>  
**Sent:** 28 September 2017 12:03  
**To:** MS Marine Licensing; Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline)  
**Subject:** RE: Wellboat Licence Applications  
**Attachments:** RE: Wellboat Licence Applications

Hi Lylian,

Apologies for labouring the point here, but it is my understanding that an application submitted will not be reviewed until payment has been received. I received notice that my application had been reviewed on the 5<sup>th</sup> September, attached. On receipt of the attached email I assumed that the payment had been found on the system thought this appears to not have been the case?

I submitted payment for these two application on the 30<sup>th</sup> August and advised that the payment would be made on the 31<sup>st</sup> August. I followed this up by email also on the 30<sup>st</sup> August with the submission of the applications. I also spoke to Sophia on the 30<sup>th</sup> to discuss the fact that payment was made at the same time as the application was submitted. I also received assurances that, although the correct payment procedure had not been followed, due to Marine Scotland's consistent issues with identifying payments made by Dawnfresh, efforts would be made to locate the wellboat application payments in a timely fashion.

Regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*

**T:** [REDACTED]

---

**From:** MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]  
**Sent:** 28 September 2017 11:37  
**To:** Peter MacDougall; Sophia.Irvine@gov.scot  
**Cc:** Jacqueline.Cameron@gov.scot  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

The fees for the applications were cleared on 26 September according to our records. If you paid by bank transfer without a reference number then it can take some time for the payment to be traced. The 14 weeks does not begin until the application is accepted, which is when the fee is paid and a licensing officer has accepted the application.

These applications will most likely be allocated next week and a licensing officer will be in touch with an update after this.

Kind Regards,

Lillian Burke  
Marine Licensing Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Please note new direct number

Direct Line: +44 (0)131 244 2621  
General Queries: +44 (0)1224 295 579  
Email: [lylian.burke@gov.scot](mailto:lylian.burke@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 11:30  
**To:** MS Marine Licensing; Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline)  
**Subject:** RE: Wellboat Licence Applications

Hi Lillian,

Thank you for the breakdown of where we are, can I ask the reason for the delay in the wellboat applications being allocated to an officer? By my records the applications were submitted and paid for in August and although there was an amendment required on the 12<sup>th</sup> it still seems a long time for the applications to be waiting for allocation.

Is this period considered as part of the 14 weeks estimated application time?

The reason for my focus on this is that I need to estimate the likely date for each licence to be granted in order that this can be considered as part of our health planning for the coming months.

Many thanks

Peter

---

**From:** [MS.MarineLicensing@gov.scot](mailto:MS.MarineLicensing@gov.scot) [<mailto:MS.MarineLicensing@gov.scot>]  
**Sent:** 28 September 2017 11:13  
**To:** Peter MacDougall; [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot)  
**Cc:** [Jacqueline.Cameron@gov.scot](mailto:Jacqueline.Cameron@gov.scot)  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Payment has been received for 06524 (Wellboat, Airds Point) and 06525 (Wellboat, Port na Mine) so these applications will be allocated to a licensing officer shortly.

The status of the other applications is as follows;  
06467 – Moorings, Sailean Ruadh – Started consultation on 22 September  
06453 – Moorings, Airds Bay – Started consultation on 11 September  
05260V – Marine Farm, Port na Mine – Application being determined

06445 – Wellboat, Sailean Ruadh – Application being determined

Jacqui, who is dealing with 05260V and 06445, is on leave currently so she will advise any further action required for these licences when she returns next week.

Kind Regards,

Lillian Burke  
Marine Licensing Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Please note new direct number

Direct Line: +44 (0)131 244 2621  
General Queries: +44 (0)1224 295 579  
Email: [lylian.burke@gov.scot](mailto:lylian.burke@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 10:42  
**To:** Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline); Burke L (Lillian); MS Marine Licensing  
**Subject:** RE: Wellboat Licence Applications

Good morning Sophia,

Could you please confirm the status of my wellboat applications for Port Na Mine and Airds Point and at what stage in the consultation they are?

Could you also confirm the status of the Sailean Ruadh wellboat application Ref: 06467; The Airds Point/Bay moorings application Ref. 06453 and the Port Na Mine Marine Licence application Ref. 05260V.

Many thanks

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*

T: [REDACTED]

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 08 September 2017 16:05

**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Great thank you for sending that over. I have also just noticed the Scottish National Marine Plan has not been considered for the Airds Point, Loch Etive site.

If you could take this into consideration, similar to your other application and send me the updated application form for Airds Point, that would be much appreciated.

Many thanks in advance.

Kind regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579  
Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 08 September 2017 15:09  
**To:** Irvine S (Sophia)  
**Subject:** RE: Wellboat Licence Applications

Hi Sophia,

Sorry, just a typo!  
It should be

- Port na Mine, Loch Etive – 56 26.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Thanks

Peter

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 08 September 2017 14:47  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Thank you for sending over the co-ordinates. I have done an initial co-ordinate check and for the Port na Mine, Loch Etive site the co-ordinates seem to be wrong. Please see link below:

- [http://gridreferencefinder.com/?gr=NN0350536835|56.4825\\_s\\_c\\_s\\_-5.1926|1&v=h](http://gridreferencefinder.com/?gr=NN0350536835|56.4825_s_c_s_-5.1926|1&v=h)

If would be grateful if you could please send the correct co-ordinate for this site at your earliest convenience. If you have any questions please let me know.

Kind regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 06 September 2017 15:33  
**To:** Irvine S (Sophia)  
**Subject:** RE: Wellboat Licence Applications

Apologies Sophia,

- Port na Mine, Loch Etive – 56 28.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Regards

Peter

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 05 September 2017 10:12  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Dear Peter,

I have reviewed your Wellboat Licence Applications in respect of the below sites and have noticed you have provided four co-ordinates for each site. For Wellboat applications we require only one co-ordinate which is representative of the middle of the site. I should be grateful if you could provide these co-ordinates for the below sites in order to continue processing your applications.

- Port na Mine, Loch Etive
- Airds Point, Loch Etive

Please also note for any future applications, we do not accept payment prior to an invoice being raised. Once an application has been reviewed it is assigned a unique reference number which helps locate the funds when they have been transferred. Paying prior to an invoice being raised often leads to a significant delay in the process by trying to locate funds.

Many thanks in advance.

Kind Regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579  
Fax: +44 (0)1224 295 524  
Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 30 August 2017 17:15  
**To:** MS Marine Licensing  
**Subject:** Wellboat Licence Applications

Good afternoon,

Please find attached two applications for Wellboat Licences for the Port Na Mine and Airds Point fish farms. Payment of the appropriate fee has requested by bank transfer and this will be completed tomorrow, 31<sup>st</sup> August. Please see attached notice of the impending payment.

Should you require any further information for either application please don't hesitate to contact me directly

Best regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*

**T:** [REDACTED]



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## Millar P (Peter)

---

**From:** Sophia.Irvine@gov.scot  
**Sent:** 05 September 2017 10:12  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Dear Peter,

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Many thanks in advance.

Kind Regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579  
Fax: +44 (0)1224 295 524  
Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

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**Sent:** 30 August 2017 17:15  
**To:** MS Marine Licensing  
**Subject:** Wellboat Licence Applications

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Should you require any further information for either application please don't hesitate to contact me directly

Best regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*  
**T:** [REDACTED]

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Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.

Tha am post-d seo (agus faidhle neo ceanglan còmhla ris) dhan neach neo luchd-ainmichte a-mhàin. Chan eil e ceadaichte a chleachdadh ann an dòigh sam bith, a' toirt a-steach còraichean, foillseachadh neo sgaoileadh, gun chead. Ma 's e is gun d'fhuair sibh seo gun fhiosd', bu choir cur às dhan phost-d agus lethbhreac sam bith air an t-siostam agaibh agus fios a leigeil chun neach a sgaoil am post-d gun dàil.

Dh'fhaodadh gum bi teachdaireachd sam bith bho Riaghaltas na h-Alba air a chlàradh neo air a sgrùdadh airson dearbhadh gu bheil an siostam ag obair gu h-èifeachdach neo airson adhbhar laghail eile. Dh'fhaodadh nach eil beachdan anns a' phost-d seo co-ionann ri beachdan Riaghaltas na h-Alba.

## Millar P (Peter)

---

**From:** Peter MacDougall <Peter.MacDougall@dawnfresh.co.uk>  
**Sent:** 29 September 2017 09:53  
**To:** MS Marine Licensing  
**Subject:** RE: Wellboat Licence Applications

Lylian,

I appreciate you have systems in place for dealing with payments but I find it very hard to accept that even with a very poor system it can take 27 days to identify a payment when you are forewarned that the payment will be made, you know the exact date the payment will be made, you are aware of who the payment is from and the exact amount of the payment.

I have submitted numerous payments for applications over recent months and it appears that regardless of whether the payment is accompanied by an application reference number my applications experience lengthy delays. It also appears to me that this is not the case with applications from other companies.

If this is solely down to the frailties of the payment system then the payment system is in need of urgent review.

Regards

Peter

---

**From:** MS.MarineLicensing@gov.scot [mailto:MS.MarineLicensing@gov.scot]  
**Sent:** 29 September 2017 08:39  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Your application was initially reviewed by Sophia when it was received. This review is undertaken to check you have provided sufficient information for the application to be input into our system and to allow an invoice to be raised. Applications are not assigned to a licensing officer for further review and processing until the fee has been paid.

You were advised that making payment without a reference can create significant delays. Payments are checked and matched centrally so it is not anyone in this team who is able to control how quickly a payment is identified. In future, it would be advisable to wait until an invoice has been issued or send a cheque with the application, to ensure payments can be correctly identified.

Kind Regards,

Lylian Burke  
Marine Licensing Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Please note new direct number

Direct Line: +44 (0)131 244 2621  
General Queries: +44 (0)1224 295 579  
Email: [lylian.burke@gov.scot](mailto:lylian.burke@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 12:03  
**To:** MS Marine Licensing; Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline)  
**Subject:** RE: Wellboat Licence Applications

Hi Lylian,

Apologies for labouring the point here, but it is my understanding that an application submitted will not be reviewed until payment has been received. I received notice that my application had been reviewed on the 5<sup>th</sup> September, attached. On receipt of the attached email I assumed that the payment had been found on the system thought this appears to not have been the case?

I submitted payment for these two application on the 30<sup>th</sup> August and advised that the payment would be made on the 31<sup>st</sup> August. I followed this up by email also on the 30<sup>st</sup> August with the submission of the applications. I also spoke to Sophia on the 30<sup>th</sup> to discuss the fact that payment was made at the same time as the application was submitted. I also received assurances that, although the correct payment procedure had not been followed, due to Marine Scotland's consistent issues with identifying payments made by Dawnfresh, efforts would be made to locate the wellboat application payments in a timely fashion.

Regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*  
**T:** [REDACTED]

---

**From:** [MS.MarineLicensing@gov.scot](mailto:MS.MarineLicensing@gov.scot) [<mailto:MS.MarineLicensing@gov.scot>]  
**Sent:** 28 September 2017 11:37  
**To:** Peter MacDougall; [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot)  
**Cc:** [Jacqueline.Cameron@gov.scot](mailto:Jacqueline.Cameron@gov.scot)  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

The fees for the applications were cleared on 26 September according to our records. If you paid by bank transfer without a reference number then it can take some time for the payment to be traced. The 14 weeks does not begin until the application is accepted, which is when the fee is paid and a licensing officer has accepted the application. These applications will most likely be allocated next week and a licensing officer will be in touch with an update after this.

Kind Regards,

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**Marine Scotland** - Marine Planning & Policy

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Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 11:30  
**To:** MS Marine Licensing; Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline)  
**Subject:** RE: Wellboat Licence Applications

Hi Lylian,

Thank you for the breakdown of where we are, can I ask the reason for the delay in the wellboat applications being allocated to an officer? By my records the applications were submitted and paid for in August and although there was an amendment required on the 12<sup>th</sup> it still seems a long time for the applications to be waiting for allocation.

Is this period considered as part of the 14 weeks estimated application time?

The reason for my focus on this is that I need to estimate the likely date for each licence to be granted in order that this can be considered as part of our health planning for the coming months.

Many thanks

Peter

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**From:** [MS.MarineLicensing@gov.scot](mailto:MS.MarineLicensing@gov.scot) [<mailto:MS.MarineLicensing@gov.scot>]  
**Sent:** 28 September 2017 11:13  
**To:** Peter MacDougall; [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot)  
**Cc:** [Jacqueline.Cameron@gov.scot](mailto:Jacqueline.Cameron@gov.scot)  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Payment has been received for 06524 (Wellboat, Airds Point) and 06525 (Wellboat, Port na Mine) so these applications will be allocated to a licensing officer shortly.

The status of the other applications is as follows;

06467 – Moorings, Sailean Ruadh – Started consultation on 22 September  
06453 – Moorings, Airds Bay – Started consultation on 11 September  
05260V – Marine Farm, Port na Mine – Application being determined  
06445 – Wellboat, Sailean Ruadh – Application being determined

Jacqui, who is dealing with 05260V and 06445, is on leave currently so she will advise any further action required for these licences when she returns next week.

Kind Regards,

Lylian Burke  
Marine Licensing Officer  
**Marine Scotland** - Marine Planning & Policy

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Please note new direct number

Direct Line: +44 (0)131 244 2621  
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Email: [lylian.burke@gov.scot](mailto:lylian.burke@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 10:42  
**To:** Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline); Burke L (Lylian); MS Marine Licensing  
**Subject:** RE: Wellboat Licence Applications

Good morning Sophia,

Could you please confirm the status of my wellboat applications for Port Na Mine and Airds Point and at what stage in the consultation they are?

Could you also confirm the status of the Sailean Ruadh wellboat application Ref: 06467; The Airds Point/Bay moorings application Ref. 06453 and the Port Na Mine Marine Licence application Ref. 05260V.

Many thanks

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*  
**T:** [REDACTED]

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 08 September 2017 16:05  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Great thank you for sending that over. I have also just noticed the Scottish National Marine Plan has not been considered for the Airds Point, Loch Etive site.

If you could take this into consideration, similar to your other application and send me the updated application form for Airds Point, that would be much appreciated.

Many thanks in advance.

Kind regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 08 September 2017 15:09  
**To:** Irvine S (Sophia)  
**Subject:** RE: Wellboat Licence Applications

Hi Sophia,

Sorry, just a typo!  
It should be

- Port na Mine, Loch Etive – 56 26.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Thanks

Peter

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 08 September 2017 14:47  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Thank you for sending over the co-ordinates. I have done an initial co-ordinate check and for the Port na Mine, Loch Etive site the co-ordinates seem to be wrong. Please see link below:



- [http://gridreferencefinder.com/?gr=NN0350536835|56.4825\\_s\\_c\\_s\\_-5.1926|1&v=h](http://gridreferencefinder.com/?gr=NN0350536835|56.4825_s_c_s_-5.1926|1&v=h)

If would be grateful if you could please send the correct co-ordinate for this site at your earliest convenience. If you have any questions please let me know.

Kind regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]

**Sent:** 06 September 2017 15:33

**To:** Irvine S (Sophia)

**Subject:** RE: Wellboat Licence Applications

Apologies Sophia,

- Port na Mine, Loch Etive – 56 28.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Regards

Peter

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]

**Sent:** 05 September 2017 10:12

**To:** Peter MacDougall

**Subject:** RE: Wellboat Licence Applications

Dear Peter,

I have reviewed your Wellboat Licence Applications in respect of the below sites and have noticed you have provided four co-ordinates for each site. For Wellboat applications we require only one co-ordinate which is representative of the middle of the site. I should be grateful if you could provide these co-ordinates for the below sites in order to continue processing your applications.

- Port na Mine, Loch Etive
- Airds Point, Loch Etive

Please also note for any future applications, we do not accept payment prior to an invoice being raised. Once an application has been reviewed it is assigned a unique reference number which

helps locate the funds when they have been transferred. Paying prior to an invoice being raised often leads to a significant delay in the process by trying to locate funds.

Many thanks in advance.

Kind Regards,

Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579  
Fax: +44 (0)1224 295 524  
Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]

**Sent:** 30 August 2017 17:15

**To:** MS Marine Licensing

**Subject:** Wellboat Licence Applications

Good afternoon,

Please find attached two applications for Wellboat Licences for the Port Na Mine and Airds Point fish farms. Payment of the appropriate fee has requested by bank transfer and this will be completed tomorrow, 31<sup>st</sup> August. Please see attached notice of the impending payment.

Should you require any further information for either application please don't hesitate to contact me directly

Best regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*

**T:** [REDACTED]

---

This email has been scanned by the Symantec Email Security.cloud service.

## Millar P (Peter)

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**From:** MS Marine Licensing  
**Sent:** 29 September 2017 08:39  
**To:** 'Peter MacDougall'  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Your application was initially reviewed by Sophia when it was received. This review is undertaken to check you have provided sufficient information for the application to be input into our system and to allow an invoice to be raised. Applications are not assigned to a licensing officer for further review and processing until the fee has been paid.

You were advised that making payment without a reference can create significant delays. Payments are checked and matched centrally so it is not anyone in this team who is able to control how quickly a payment is identified. In future, it would be advisable to wait until an invoice has been issued or send a cheque with the application, to ensure payments can be correctly identified.

Kind Regards,

Lylian Burke  
Marine Licensing Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

Please note new direct number

Direct Line: +44 (0)131 244 2621  
General Queries: +44 (0)1224 295 579  
Email: [lylian.burke@gov.scot](mailto:lylian.burke@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [mailto:Peter.MacDougall@dawnfresh.co.uk]  
**Sent:** 28 September 2017 12:03  
**To:** MS Marine Licensing; Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline)  
**Subject:** RE: Wellboat Licence Applications

Hi Lylian,

Apologies for labouring the point here, but it is my understanding that an application submitted will not be reviewed until payment has been received. I received notice that my application had been reviewed on the 5<sup>th</sup> September, attached. On receipt of the attached email I assumed that the payment had been found on the system thought this appears to not have been the case?

I submitted payment for these two application on the 30<sup>th</sup> August and advised that the payment would be made on the 31<sup>st</sup> August. I followed this up by email also on the 30<sup>st</sup> August with the submission of the applications. I also spoke to Sophia on the 30<sup>th</sup> to discuss the fact that payment was made at the same time as the application was submitted. I also received assurances that, although the correct payment procedure had not been followed, due to Marine Scotland's consistent issues with identifying payments made by Dawnfresh, efforts would be made to locate the wellboat application payments in a timely fashion.

Regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*

**T:** [REDACTED]

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**From:** [MS.MarineLicensing@gov.scot](mailto:MS.MarineLicensing@gov.scot) [<mailto:MS.MarineLicensing@gov.scot>]  
**Sent:** 28 September 2017 11:37  
**To:** Peter MacDougall; [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot)  
**Cc:** [Jacqueline.Cameron@gov.scot](mailto:Jacqueline.Cameron@gov.scot)  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

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Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

Frequently  
Asked  
Questions

---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 11:30  
**To:** MS Marine Licensing; Irvine S (Sophia)

**Cc:** Cameron J (Jacqueline)  
**Subject:** RE: Wellboat Licence Applications

Hi Lylian,

Thank you for the breakdown of where we are, can I ask the reason for the delay in the wellboat applications being allocated to an officer? By my records the applications were submitted and paid for in August and although there was an amendment required on the 12<sup>th</sup> it still seems a long time for the applications to be waiting for allocation.

Is this period considered as part of the 14 weeks estimated application time?

The reason for my focus on this is that I need to estimate the likely date for each licence to be granted in order that this can be considered as part of our health planning for the coming months.

Many thanks

Peter

---

**From:** [MS.MarineLicensing@gov.scot](mailto:MS.MarineLicensing@gov.scot) [<mailto:MS.MarineLicensing@gov.scot>]  
**Sent:** 28 September 2017 11:13  
**To:** Peter MacDougall; [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot)  
**Cc:** [Jacqueline.Cameron@gov.scot](mailto:Jacqueline.Cameron@gov.scot)  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Payment has been received for 06524 (Wellboat, Airds Point) and 06525 (Wellboat, Port na Mine) so these applications will be allocated to a licensing officer shortly.

The status of the other applications is as follows;  
06467 – Moorings, Sailean Ruadh – Started consultation on 22 September  
06453 – Moorings, Airds Bay – Started consultation on 11 September  
05260V – Marine Farm, Port na Mine – Application being determined  
06445 – Wellboat, Sailean Ruadh – Application being determined

Jacqui, who is dealing with 05260V and 06445, is on leave currently so she will advise any further action required for these licences when she returns next week.

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Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

Frequently  
Asked  
Questions

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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 28 September 2017 10:42  
**To:** Irvine S (Sophia)  
**Cc:** Cameron J (Jacqueline); Burke L (Lillian); MS Marine Licensing  
**Subject:** RE: Wellboat Licence Applications

Good morning Sophia,

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Many thanks

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*  
**T:** [REDACTED]

---

**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 08 September 2017 16:05  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Great thank you for sending that over. I have also just noticed the Scottish National Marine Plan has not been considered for the Airds Point, Loch Etive site.

If you could take this into consideration, similar to your other application and send me the updated application form for Airds Point, that would be much appreciated.

Many thanks in advance.

Kind regards,

Sophia

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Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

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Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



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**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]

**Sent:** 08 September 2017 15:09

**To:** Irvine S (Sophia)

**Subject:** RE: Wellboat Licence Applications

Hi Sophia,

Sorry, just a typo!

It should be

- Port na Mine, Loch Etive – 56 26.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Thanks

Peter

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**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]

**Sent:** 08 September 2017 14:47

**To:** Peter MacDougall

**Subject:** RE: Wellboat Licence Applications

Hi Peter,

Thank you for sending over the co-ordinates. I have done an initial co-ordinate check and for the Port na Mine, Loch Etive site the co-ordinates seem to be wrong. Please see link below:

- <http://gridreferencefinder.com/?gr=NN0350536835|56.4825 s c s -5.1926|1&v=h>

If would be grateful if you could please send the correct co-ordinate for this site at your earliest convenience. If you have any questions please let me know.

Kind regards,

Sophia

Sophia Irvine

Marine Licensing Support Officer

**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579

Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)

Website: <http://www.gov.scot/Topics/marine/Licensing/marine>

---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 06 September 2017 15:33  
**To:** Irvine S (Sophia)  
**Subject:** RE: Wellboat Licence Applications

Apologies Sophia,

- Port na Mine, Loch Etive – 56 28.95N, 005 11.56W
- Airds Point, Loch Etive – 56 27.30N, 005 15.58W

Regards

Peter

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**From:** [Sophia.Irvine@gov.scot](mailto:Sophia.Irvine@gov.scot) [<mailto:Sophia.Irvine@gov.scot>]  
**Sent:** 05 September 2017 10:12  
**To:** Peter MacDougall  
**Subject:** RE: Wellboat Licence Applications

Dear Peter,

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- Airds Point, Loch Etive

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Sophia

Sophia Irvine  
Marine Licensing Support Officer  
**Marine Scotland** - Marine Planning & Policy

Scottish Government | Marine Laboratory | 375 Victoria Road | Aberdeen | AB11 9DB

General Queries: +44 (0)1224 295 579  
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Email: [sophia.irvine@gov.scot](mailto:sophia.irvine@gov.scot)  
Website: <http://www.gov.scot/Topics/marine/Licensing/marine>



---

**From:** Peter MacDougall [<mailto:Peter.MacDougall@dawnfresh.co.uk>]  
**Sent:** 30 August 2017 17:15  
**To:** MS Marine Licensing  
**Subject:** Wellboat Licence Applications

Good afternoon,

Please find attached two applications for Wellboat Licences for the Port Na Mine and Airds Point fish farms. Payment of the appropriate fee has requested by bank transfer and this will be completed tomorrow, 31<sup>st</sup> August. Please see attached notice of the impending payment.

Should you require any further information for either application please don't hesitate to contact me directly

Best regards

**Peter MacDougall**  
**Environmental Coordinator**



*Dawnfresh Farming Ltd*  
*Bothwellpark Industrial Estate*  
*Uddingston*  
*Lanarkshire*  
*G71 6LS*  
**T:** [REDACTED]

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This email has been received from an external party and

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This e-mail (and any files or other attachments transmitted with it) is intended solely for the attention of the addressee(s). Unauthorised use, disclosure, storage, copying or distribution of any part of this e-mail is not permitted. If you are not the intended recipient please destroy the email, remove any copies from your system and inform the sender immediately by return.

Communications with the Scottish Government may be monitored or recorded in order to secure the effective operation of the system and for other lawful purposes. The views or opinions contained within this e-mail may not necessarily reflect those of the Scottish Government.