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Nick Underdown
By email nick@openseas.org.uk

18 August 2017

Dear Mr Underdown

**REQUEST UNDER THE ENVIRONMENTAL INFORMATION (SCOTLAND)
REGULATIONS 2004 (EIRs): FoI 17/01686
REQUEST FOR INFORMATION ON CLEANERFISH**

Thank you for your request dated 20 July under the Environmental Information (Scotland) Regulations 2004 (EIRs).

Your request

1. *How many individual wild wrasse and wild lumpsuckers were inputted to Scottish salmon farms for use as cleanerfish in 2011, 2012, 2013, 2014, 2015, 2016.*
2. *For each year's total number, what are the percentage of different wild species of cleanerfish used, ie a breakdown of the total number by species: *Labrus bergylta*, *Cyclopterus lumpus*, *Ctenolabrus rupestris*, *Centrolabrus exoletus*, *Labrus mixtus*.*
3. *Where were the wild-caught cleanerfish sourced? For each year and species what percentage by number of fish were sourced from Scotland and England.*
4. *How many individual farmed wrasse and farmed lumpsuckers were inputted to Scottish salmon farms for use as cleanerfish in 2011, 2012, 2013, 2014, 2015, 2016.*
5. *For each year and species (wild and farmed) of deployed cleanerfish, how many cleaner fish were culled out of farms as part of the routine culling of cleanerfish.*
6. *Does Marine Scotland record the number of wild fish caught or purchased by Scottish salmon farm companies intended for use as cleanerfish.*
7. *How many individual wild wrasse and wild lumpsuckers were caught or purchased for use as cleaner fish in Scottish salmon farms in 2011, 2012, 2013, 2014, 2015, 2016.*
8. *For each year and wild-caught species of cleanerfish caught or purchased for use in Scottish salmon farms, apart from those deployed cleanerfish subject to routine culling, how many mortalities were there during the production cycle and at what stage did the mortalities occur, i.e. during capture; storage; transport or deployment.*

9. *For each year and farmed species of deployed cleanerfish, apart from those deployed cleanerfish subject to routine culling, how many mortalities were there during the production cycle and what was the primary cause of those mortalities.*
10. *What research has been undertaken to determine what impact the wrasse fishery in Scotland has had or is having on wrasse stocks and whether it is sustainable.*

As the information you have requested is 'environmental information' for the purposes of the Environmental Information (Scotland) Regulations 2004 (EIRs), we are required to deal with your request under those Regulations. We are applying the exemption at section 39(2) of the Freedom of Information (Scotland) Act 2002 (FOISA), so that we do not also have to deal with your request under FOISA.

This exemption is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exemption. We have found that, on balance, the public interest lies in favour of upholding the exemption, because there is no public interest in dealing with the same request under two different regimes. This is essentially a technical point and has no material effect on the outcome of your request.

Response to your request

We do endeavour to provide information whenever possible, and a search of our records has provided the following:

Item 4: we understand that 1.5 million farmed cleaner fish were utilised by the aquaculture sector in Scotland in 2016.

However, we cannot provide the other information requested for the following reasons:

Items 1, 3, 5, 7, 8, 9: we do not have sufficient data on which to base a response.

Item 2: we do not collect or hold Information or data to enable us to calculate or provide a percentage breakdown by species of the cleanerfish used by Scottish salmon farms.

Item 6: we do not currently record or hold information on the number of wild fish caught or purchased by Scottish salmon farm companies.

Item 10: We have not undertaken any research on the impact wrasse fishing in Scotland may have had on wrasse stocks and sustainability.

Exceptions

4. While our aim is to provide information whenever possible, in this instance the Scottish Government does not have the information you have requested. Therefore we are refusing your request under the exception at regulation 10(4) (a) of the EIRs. The reasons why that exception applies are explained in the Annex to this letter.

Your right to request a review

If you are unhappy with this response to your EIRs request, you may ask us to carry out an internal review of the response, by writing to Graham Black , Director of Marine Scotland, 1-B South, Victoria Quay, Edinburgh EH6 6QQ, or emailing Directormarinescotland@gov.scot.

Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your appeal rights is available on the Commissioner's website at:

<http://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx>.

Yours sincerely

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Fiona Watt

FIONA WATT

Performance Aquaculture and Recreational Fisheries

ANNEX

The Scottish Government does not have the information

Under the terms of the exception at regulation 10(4) (a) of the EIRs (information not held), the Scottish Government is not required to provide information which it does not have. The Scottish Government does not have the information you have requested because it is not held.

This exception is subject to the 'public interest test'. Therefore, taking account of all the circumstances of this case, we have considered if the public interest in disclosing the information outweighs the public interest in applying the exception. We have found that, on balance, the public interest lies in favour of upholding the exception. While we recognise that there may be some public interest in information about wrasse numbers on Scottish salmon farms, clearly we cannot provide information which we do not hold.