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12 May 2017

Complaint against Freedom Food (RSPCA Assured)

Please consider this a formal complaint against [Freedom Food](#) (re-branded as [RSPCA Assured](#) in 2016) - as [registered by the Scottish Charity Regulator as Freedom Food Limited, SC038199](#) and [registered by the Charity Commission as Charity no. 1059879](#) (and Company no. [2723670](#)).

[Freedom For Fish](#) (a campaign recently launched by the [Global Alliance Against Industrial Aquaculture](#)) presents evidence below and in various attachments sourced from data obtained via FOI from the Scottish Environment Protection Agency and Scottish Natural Heritage (see next email) detailing reasons why Freedom Food should not be afforded charitable status. Our complaint and submitted evidence focuses solely on farmed salmon and focuses on:

- 1) Freedom Food Promotes Not Prevents Cruelty to Animals Via Salmon Farming Accreditation
- 2) Freedom Food is Commercial NOT Charitable
- 3) Freedom Food Accredited Scottish Salmon is a Welfare Nightmare
- 4) Freedom Food Accounts for ca. 70% of Scottish Salmon Farming Production



GAAIA has complained previously with regard to Freedom Food's accreditation of farmed salmon in letters dated [November 2015](#); [August 2015](#); and [July 2012](#). Suffice to say that GAAIA has never received a satisfactory reply and has been in no way reassured. The only assurance is that the RSPCA are still promoting the killing of seals and other cruel and inhumane animal welfare problems via accreditation of Freedom Food/RSPCA Assured farmed salmon.

Please note from [Freedom Food's 2014 Annual Report](#):

12. ULTIMATE PARENT ENTITY AND CONTROLLING ENTITY

The company's ultimate parent and controlling entity is the Royal Society for the Prevention of Cruelty to Animals ("RSPCA"), a registered charity in Great Britain. Copies of consolidated accounts are available from RSPCA, Wilberforce Way, Southwater, Horsham West Sussex, RH13 9RS. There is no intermediate parent company.

In other words, the RSPCA is providing the bullets and Freedom Food (as their commercial arm accrediting seal-killing salmon farms) is pulling the trigger.



For example, GAAIA's [letter of November 2015](#) included:

The RSPCA's stance in support of killing seals at salmon farms in Scotland seems completely out of kilter with the RSPCA's mandate of animal welfare. Why does the RSPCA rescue seals in Norfolk, [for example](#), when it is sponsoring their slaughter in Scotland?



And isn't it hypocritical in the extreme for the RSPCA to use [cute images of seals to raise money and raise your public profile](#) when you are promoting the killing of seals at salmon farms in Scotland?

GAAIA's [letter of August 2015](#) included:

Moreover, the data reveals that out of 173 seals killed during 2013 and 2014 only 19 carcasses (11%) were reported, 16 carcasses recovered (9%) and only one carcass (<1%) collected via the [Scottish Marine Animal Strandings Scheme](#).

Does the RSPCA/Freedom Food condone the practice of leaving seal corpses to rot (and potentially spread disease) around the coast of Scotland?

When badgers are culled on land, for example, surely their corpses are disposed of humanely? Why is not the same level of humanity and animal welfare afforded to seals?

And:

The RSPCA's then Chief Executive, Gavin Grant, told GAAIA in July 2012:

"In 2008, 460 seals were shot at Freedom Food farms. This was totally unacceptable and led to our standards being re-written. In 2010 the number declined to 52, a reduction of 90 per cent. In 2011, this figure was further reduced to 46".

[Note that the figure for 46 dead seals in 2011 was upgraded to 61 during a Radio 4 broadcast on 18 October 2012: <http://www.bbc.co.uk/programmes/b01nbqzc>]

The Daily Telegraph [reported](#) in April 2015:

"More than a quarter of the seals killed along the nation's coastline last year were shot by RSPCA-accredited fish farmers. In Scotland alone, 205 seals are known to have been legally killed to protect stocks of salmon and other fish. Of those, 52 were shot by the animal welfare charity's Freedom Food initiative, which is dedicated to improving conditions for farm animals."

In 2008, The Guardian reported via "[RSPCA warns Scottish salmon farmers to shoot fewer seals](#)":

"Salmon farmers could be expelled from one of the UK's leading animal welfare schemes if they continue shooting seals in large numbers, after scientists warned that common seals are suffering a catastrophic decline. The RSPCA is to warn more than 80 fish farms that are members of its Freedom Foods welfare accreditation scheme that they must curb the practice or face losing their valuable membership of the scheme. The retailer Sainsbury's has also promised it will phase out suppliers associated with seal shooting after the Guardian revealed that common seal numbers fell by a quarter last year in some parts of the UK and by 50% over the past five years in others."

However, [data obtained by GAAIA in April 2017 from Scottish Natural Heritage](#) included the damning revelation that Freedom Food accredited salmon farms are killing significant numbers of seals in Scotland:

RSPCA Assured/Freedom Food accredited salmon farms accounted for almost 70% of the seals shot by salmon farms in 2014 (an increase from 26% in 2011 before falling to 52% in 2015).

The biggest individual seal shooting companies in 2015 were both RSPCA Assured/Freedom Food accredited salmon producers that supply both Sainsbury's and Waitrose.

RSPCA Assured/Freedom Food accredited companies Marine Harvest and Scottish Sea Farms shot 18 and 15 seals respectively in 2015 with Waitrose supplier Scottish Salmon Company shooting 11 seals.

Waitrose are looking at individual salmon farms and producing region statistics re. seal numbers shot to assess any hotspots of their suppliers. They are aiming to produce guidelines for their suppliers to benchmark what they consider to be best practice, with the aspiration of zero shootings.

The RSPCA approached Marine Scotland in 2016 to discuss the definition of 'last resort'.

In 2016, only 31% of salmon farms used anti-predator nets including many Marine Harvest farms which claim to adhere to a "last resort" seal-killing policy (at least this was an increase on the 18% of salmon farms which used anti-predator nets in 2015).

Moreover:

- If "all the fish are farmed to RSPCA Freedom Food standards" [as claimed by Scottish Sea Farms](#) then why are seals killed at the following sites where anti-predator nets are NOT used?:

Bight of Bellister; Holms Geo; Shapinsay; Slocka Ronas Voe; Spelve A and Vidlin North

- If Marine Harvest abides by "last resort" seal-killing (as it [claimed in The Herald newspaper in April 2017](#)) then how does Marine Harvest explain the 22 seals it killed during 2016 at the following sites where anti-predator nets were NOT used ("bi catch concerns" (sic) was the reason given)?:

Cairidh; Camas Glas; Colonsay; Creag an t Sagairt; Eilean Grianain; Greshornish; Hellisay; Isle Ewe; Kingairloch; Linnhe; Lochalsh; Loch Carnan; Maol Ban; Marulaig and Ornish

- Note that one of the people Marine Harvest has to persuade is the RSPCA's newly appointed certifier of salmon farms - Ian Michie (who conveniently "[was a fish farm manager for Marine Harvest for many years](#)").

- Note that the [RSPCA Assured/Freedom Food standards](#) also demand "the humane culling of seals as a last resort". Here's [key changes to the RSPCA welfare standards for farmed Atlantic salmon](#) within the September 2015 version of the standards:

<p>New standard HP 7.16 The humane dispatch of any seal must only be undertaken as a last resort in order to protect the welfare of the fish and where all non-lethal methods have failed to do so.</p>
<p>New standard HP 7.17 Before the humane culling of seals as a last resort can be considered, the following must have been implemented:</p> <ul style="list-style-type: none"> a) nets are adequately tensioned b) top nets secured to deny ingress by predators into the enclosure c) dead fish have been regularly removed d) where appropriate, ADDs/ASDs have been mobilised and are working properly e) predator nets/curtains/screens have been deployed where it is appropriate to do so.
<p>New standard HP 7.18 The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer, that all of the steps leading up to a last resort scenario have been implemented.</p>

Of the 26 salmon farms where anti-predator nets were certainly NOT used but which still killed seals in 2016, all except three (Swarta Skerry, Balta Island Seafare; Taranais and Gometra, The Scottish Salmon Company) were operated by a company claiming to be accredited by [RSPCA Assured/Freedom Food](#); namely: [Loch Duart](#), [Marine Harvest](#), [Cooke Aquaculture](#) and [Scottish Sea Farms](#).

Data obtained from SNH ([Download SNH FOI 25 April 2017 document #7](#)) does at least name seven Freedom Food salmon farms - including Marine Harvest's Colonsay salmon farm which did not use either Acoustic Deterrent Devices (ADDs) or APNs yet [shot one grey seal in 2016](#):

ApplicationPeriod	FishFarmName	Reg #	SchemeAffiliation	SiteOwner	ADDUsed	APNUsed
01/10/2016 - 30/09/2017	North Sandwick	FS/0710	FreedomFood	Cooke Aquaculture Scotland	FALSE	FALSE
01/10/2016 - 30/09/2017	Balta Island	FS/0717	FreedomFood	Cooke Aquaculture Scotland	FALSE	FALSE
01/10/2016 - 30/09/2017	Kirkabister	FS 0802	FreedomFood	Cooke Aquaculture Scotland	FALSE	FALSE
01/10/2016 - 30/09/2017	Westerbister	FS1305	FreedomFood	Scottish Sea Farms Orkney and Eriboll	FALSE	TRUE
01/10/2016 - 30/09/2017	Hamnavoe	FS1144	FreedomFood	Hjaltland Seafarms Ltd		
01/10/2016 - 30/09/2017	Snarraness	FS0400	FreedomFood	Scottish Sea Farms Ltd	TRUE	FALSE
01/10/2016 - 30/09/2017	Colonsay	FS1296	FreedomFood	Marine Harvest (Scotland) Ltd	FALSE	FALSE

Read more via [RSPCA/Freedom Food & Seal Killing FOI Backgrounder \(May 2017\)](#)

GAAIA's [letter to Her Majesty the Queen, as royal patron of the RSPCA, in December 2015](#) included:

Given RSPCA Assured's ['shoot-to-kill' policy on salmon farms](#), the RSPCA should be renamed the Royal Seal Culling Association!



A [press release](#) issued by GAAIA publicising the letter to Her Majesty the Queen included:

"When you buy Scottish salmon, including salmon carrying the RSPCA logo, you pay for bullets to shoot seals," said [John Robins](#) of [Animal Concern](#). "My message to the RSPCA is 'Just say no - stop your farmers killing seals'. The RSPCA could give seals the perfect Christmas present – they could give them the gift of life by banning seal shooting at RSPCA assured salmon farms. RSPCA chiefs have to decide who they represent; seal-shooting multinationals or the animals they persecute."

RSPCA attacked for its policy on seal shooting

CHRIS CHOI | CONSUMER EDITOR



In summary, GAAIA's complaint focuses on:

1) Freedom Food Promotes Not Prevents Cruelty to Animals Via Salmon Farming Accreditation:

The "[Aims & Activities](#)" of Freedom Food include "to prevent cruelty to animals by the promotion of humane farming" yet intensive salmon farming (which crams hundreds of thousands of Atlantic salmon - a migratory species - in factory cages) is the antithesis of humane farming and promotes cruelty to fish as well as animals such as seals, birds, whales and porpoises (see Point 3 for specific details).

Aims & activities

To prevent cruelty to animals by the promotion of humane farming, transportation, slaughter, and marketing of farm animals, in particular but without prejudice to generality of the foregoing, by implementing a set of rearing and handling standards approved and amended from time to time by the The Royal Society For The Prevention Of Cruelty To Animals ("The RSPCA").

Freedom Food's [2015 Annual Report](#) claims "public benefit" yet it is difficult to see beyond the commercial benefits to Freedom Food (and the RSPCA) and the salmon farming companies certified via Freedom Food:

PUBLIC BENEFIT

In considering public benefit the directors and trustees have had regard to the guidance issued by the Charity Commission. It is not enough that Freedom Food's work benefits animals. Richard Martin, one of the RSPCA's nineteenth century founders, identified the Society's prime aim as being to alter the moral feelings of the country. He recognised that taking care of animals is an essential part of any civilisation. This still resonates today. Preventing cruelty to animals promotes humane sentiments in humankind towards animals which involves moral benefit to the human community as a whole. Whilst this public benefit is clear, it is difficult to quantify and must be balanced against any detriment.

The Results and Activities section of this report demonstrate the achievements and performance of Freedom Food and the benefit provided to the public. All our charitable activities focus on promoting kindness and preventing or suppressing cruelty to animals and are undertaken to further these charitable purposes for the public benefit.

If Freedom Food were seriously focussed on "promoting kindness and preventing or suppressing cruelty" then they would not condone the killing of seals (including pregnant and lactating mothers).



Photo: Seal killed near a Marine Harvest salmon farm in Loch Alsh (note that "").

If Freedom Food truly cared about "the moral feelings of the country" why do they [condone the killing of seals on salmon farms](#) when the [vast majority of the general public do not](#)?

RSPCA upsets people by saying seal shooting is okay



Ashitha Nagesh for Metro.co.uk Sunday 11 Oct 2015 12:04 pm



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Fish farmers are allowed to shoot seals (Picture: AFP/Getty Images)

The RSPCA is under fire for allowing fish farmers to shoot seals.

An [opinion poll by Metro in October 2015](#) reported that 87 per cent of people are opposed to the killing of seals on salmon farms."



Freedom Food is not interested in promoting public benefit - only in promoting corporate profit.

2) Freedom Food is Commercial NOT Charitable:


Freedom Food's guiding principles and values are clearly commercial not charitable. In fact, the more farmed salmon produced and the more intensive the salmon farming operation the more money Freedom Food rakes in. You only have to look at the composition of the [RSPCA's Salmon Technical Advisory Group](#) to see the emphasis on commercial enterprise (not a single NGO or animal welfare group - other than the RSPCA - is represented):

RSPCA farmed salmon standards technical advisory groups

Members of the RSPCA Salmon (Freshwater) Standards Technical Advisory Group (FW) and RSPCA Salmon (Seawater) Standards Technical Advisory Group (SW) are selected on the basis of the specific expertise they bring to the groups in different areas of farmed salmon care. Members include:

- John Avizienius (RSPCA farmed salmon specialist) **FW and SW**
- Alasdair MacDonald (Scottish Salmon) **FW**
- Andy Young (Cooke Aquaculture) **FW and SW**
- Chris Findlay (Fish Vet Group) **FW and SW**
- Dave Danson (Landcatch) **FW**
- David Cockerill (Marine Harvest) **SW**
- David Roadknight (Lochduart) **FW**
- George Whyte (Kintail Hatchery) **FW**
- Gilpin Bradley (Wester Ross Salmon) **FW and SW**
- Grant Cumming (Hjaltland Seafarms Ltd) **SW**
- Hugh Murray (Migdale Smolt Ltd) **FW**
- Hugh Richards (Wester Ross Salmon) **FW and SW**
- Ian Armstrong (Partners in Welfare) **FW and SW**
- John Barrington (Scottish Sea Farms) **FW and SW**
- John Richmond (Marine Harvest Scotland) **FW**
- Jon Walden (Hjaltland Seafarms Ltd) **FW**
- Kim Thomas (Scottish Salmon) **FW and SW**
- Michelle Johnson (Cooke Aquaculture) **FW and SW**
- Nick Joy (Lochduart) **FW and SW**
- Paul ArmstrongWilson (Solway Transport) **FW**
- Paul Irving (Meridian Salmon) **FW**
- Rob Murray (Howietoun) **FW**
- A technical/field operations representative of Freedom Food Ltd **FW and SW**
- A representative of RSPCA field staff (Farm Livestock Officers) who monitor Freedom Food scheme members **FW and SW**

The Freedom Food [web-site](#) outlines the 0.875p per kilo generated by farmed salmon:



Home About us Benefits to your business RSPCA welfare standards Join us Selling RSPCA Assured

Licence fee

Home > Selling RSPCA Assured > Licence fee 1 of 2 pages

The RSPCA Assured certification mark has a value due to the public's recognition and understanding of the RSPCA brand and this is reflected in the licence fee.

The money generated by licence fee helps us run the scheme and promote the certification mark, further increasing its value to those who use it on their products and menus. As we are a charity, every penny is put back into improving farm animal welfare.

Licence fee is based on the price you sell the product at, excluding VAT.

The only exception is for secondary products where the RSPCA Assured ingredient is only one of a number of ingredients - for example a sandwich or a pie. In these instances licence fee is based on the purchase price of the RSPCA Assured ingredients.

Licence fees

Meat, poultry and liquid egg - 0.375% of value of product sold

Eggs (including boiled eggs) - 5p per 30 dozen eggs sold

Milk - 2.5p per 20 litres sold

Salmon and trout - 0.875p of value of product sold per kilo (gutted weight)

Licence fees must be paid quarterly. Businesses submit a licence fee return form and Freedom Food will send an invoice for the licence fee owed.

Sales quantities and values will be audited annually and if further licence fee is due it will be payable immediately, plus interest.

If a business ceases to be a member of Freedom Food, the RSPCA Assured certification mark or any references to it must be removed from all products, menus, stationery, buildings, vehicles and all marketing communications immediately.

To request a licence fee return form or for more information about licence fees, please [email us](#) or call us on 01403 800141.

All uses of the RSPCA Assured certification mark and the words RSPCA Assured are strictly subject to membership and **should be emailed to us** for written approval.

Please note from a report - "[RSPCA/Freedom Food certification of Scottish farmed salmon](#)" - published by the Salmon & Trout Association in 2013:

Does it cost anything to be certified?

5.1 The Freedom Food certification scheme applies a tariff to salmon farms and farmers must pay a minimum membership fee of £475 per farm site plus a licence fee of 0.7 pence per kilogram of gutted weight made available for sale⁶.

⁴ Freedom Food Limited Articles of Association, 4th February 2010, Companies House

⁵ www.rspca.org.uk/sciencegroup/farmanimals/standards/salmon, as at 20th September 2012

⁶ CMI Certification Freedom Food Scheme Minimum Membership Fee and Licence Fee, undated

5.2 This appears to mean that, for example, the typical farm production, over a two year cycle, of 300,000 fish at 3 kilograms gutted weight each, would trigger a licence fee of £6,300 for that one farm.

5.3 It is however difficult to put a figure on Freedom Food's income from certification of farmed salmon.

5.4 The annual salmon production of the Scottish salmon-farming industry was 158,013 tonnes in 2011⁷ and is slowly rising. The Scottish Salmon Producers Organisation (SSPO) states that more than 90% of Scottish salmon will be farmed to RSPCA Freedom Food welfare standards within the next two years⁸. Allowing for a 25% difference between the weight of fish harvested and of gutted fish, this would imply a revenue stream to Freedom Food of between £800,000 and £1 million per annum.

Since Scottish salmon farming production was 177,857 tonnes in 2016 (as projected by the [2015 Fish Farm Survey published in September 2016](#) by the Scottish Government) and the licence fee has increased up to 0.875p per kilo the revenue generated by Freedom Food via farmed salmon must be over £1 million per year.

If Scottish salmon farming earns Freedom Food £1 million per year this would represent 50% of income (according to [Freedom Food's 2015 Annual Report](#)):

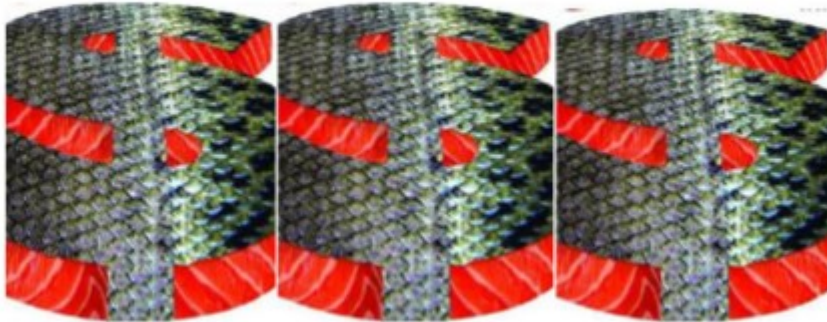
b) Income from charitable activities

	2015	2014
	£	£
Assessments	667,745	626,716
License fees	1,332,200	1,145,470
	<u>1,999,945</u>	<u>1,772,186</u>

Again, it is difficult to understand how assessing and accrediting salmon farms as RSPCA Assured (especially when there are a raft of reasons why salmon farming is ethically, environmentally, morally and humanely bankrupt - see point 3) can in any way be described as a "charitable activity".

As GAAIA stated in December 2015:

GAAIA [believes](#) that the RSPCA sacrificed protection for profit a long time ago. It is understood that each salmon farm certified under the RSPCA Assured scheme pays several thousand pounds therefore raking in hundreds of thousands of pounds for the RSPCA!



Ker-ching - that's the sounds of the RSPCA's cash register as dozens of Scottish salmon farms have rushed to be certified as 'welfare-friendly' since 2002. In fact, over 70% of Scottish farmed salmon is now certified as "welfare-friendly" via the RSPCA Assured scheme ([formerly Freedom Food](#)). Since there were 260 salmon farms in 2014 (the latest [government survey available](#)) that could mean over 180 RSPCA Assured salmon farms in Scotland.



3) Freedom Food Accredited Scottish Salmon is a Welfare Nightmare:

Scottish salmon farming is a welfare nightmare not a humane and welfare-friendly form of animal husbandry. For a general review please read Compassion In World Farming's 2007 report "[Closed Waters: The Welfare of Farmed Atlantic Salmon, Rainbow Trout, Atlantic Cod and Atlantic Halibut](#)".

Freedom Food was also strongly criticised in a 2013 report - "[RSPCA/Freedom Food Certification of Scottish Farmed Salmon](#)" - published by the Salmon & Trout Association. Read more via The Guardian: "[Freedom Foods 'failing to crack down' on poor salmon farming standards](#)".

Examples of animal welfare problems caused by Freedom Food accredited salmon farms in Scotland include:

a) Noise Pollution Impact on Whales, Dolphins & Porpoises:

A news article published earlier this month in the Sunday Herald newspaper - "[Health of whales, dolphins and porpoises put at risk by underwater alarms](#)" - reported:



May 7th, 2017

Health of whales, dolphins and porpoises put at risk by underwater alarms

Rob Edwards

WHALES, dolphins and porpoises off the west coast of [Scotland](#) are being put at risk by noise alarms used by fish farms to scare off seals, scientists are warning. Underwater acoustic deterrent devices (ADDs) deployed by more than 130 fish farms can be heard at least 30 kilometres away.

As a result, lochs, bays and large areas of sea in Scotland are now polluted by noise, threatening the health of cetaceans. The marine mammals depend on sound to navigate the seas. Loud underwater noises can cause permanent hearing loss, stress and disorientation resulting in whales and dolphins beaching and dying.

New research - "[Large-scale underwater noise pollution from Acoustic Deterrent Devices \(ADDs\) on the west coast of Scotland](#)" - presented at the European Cetacean Society conference in Denmark in May 2017 sounded the alarm on the use of ADDs on Scottish salmon farms.

Monday 1 May 2017

Large-scale underwater noise pollution from Acoustic Deterrent Devices (ADDs) on the west coast of Scotland

Denise Risch³, Charlotte Rose Findlay^{1,2}, Hayden Ripple², Steven Benjamins³, Ben Wilson³, Frazer Coomber⁴

(1) Joint Nature Conservation Committee, Aberdeen, AB, United Kingdom.

(2) University of St Andrews; Scottish Association for Marine Science.

(3) Scottish Association for Marine Science.

(4) Hebridean Whale and Dolphin Trust.

Expansion of the aquaculture industry off Scotland has led to conflicts with marine predators such as seals, which predate species bred in aquaculture facilities and cause damage to equipment. To mitigate this, non-lethal management tools have been developed, the most popular of which are Acoustic Deterrent Devices (ADDs) or 'seal scarers'. ADDs broadcast loud, aversive sounds within the hearing range of the target species (i.e. seals). However their success in addressing the issue has been variable. In addition their unregulated use in Scotland could pose unintended ecological impacts to non-target species such as the harbour porpoise (*Phocoena phocoena*). This study aimed to address the gap in knowledge on the extent of ADD use in the Scottish aquaculture industry, and to quantify the scale of their acoustic presence in Scottish waters. Acoustic data collected during cetacean line-transect surveys carried out by the Hebridean Whale and Dolphin Trust (HWDT) were used to map the acoustic presence of ADDs across the west coast between 2006 and 2015. Results found a significant spatial and temporal increase in ADD presence across the west coast study regions (detections per unit effort; 2006 = 0.5%; 2015 = 15.3%). This study highlights the large-scale extent of noise from ADDs use at fish farms across Scotland and illustrates its gradual increase over the study period. The increasing ensonification of the Scottish coastline which includes multiple protected areas for marine mammals, due to these devices may pose a risk to both target and non-target species (e.g. odontocete cetaceans) that use these areas either seasonally or year round. This study is one of the first to highlight the large-scale extent of ADD noise pollution and its overlap with marine mammal habitat. This information is crucial in order to effectively address European legislation related to underwater noise and marine species protection.

Read more via "[Fish farm noise pollution threatens whales and dolphins](#)"

A document disclosed by Scottish Natural Heritage via FOI in April 2017 ([Download SNH FOI 25 April 2017 document #1](#)) included notes from a liaison meeting in May 2016 between SNH and the salmon farming industry which pointed to Freedom Food accreditation promoting the use of ADDs on salmon farms:

It was highlighted by industry that the requirements of some accreditation schemes such as freedom foods require operators to undertake certain management measures in order to retain accreditation. Concerns were raised that if a seal attack takes place and ADDs were not used as a form of defence that this could risk accreditation being lost.

Retaining Freedom Foods accreditation is deemed by industry to be a major barrier in reducing ADD use.

b) Thousands of Farmed Salmon Thermoliced to Death:

In November 2016, the Sunday Herald [revealed](#):

Oops: fish farm firm kills 175,000 of its salmon by accident



A worker at a salmon farm on Loch Linnhe near Fort William. Outbreaks of sea lice and accusations that farmed salmon are artificially coloured and may contain PCBs and dioxins, have put the fish farm industry under severe pressure.

5 hrs ago / Exclusive by **Rob Edwards**

EXCLUSIVE

ONE of the world's largest fish farming companies has accidentally killed more than 175,000 of its caged salmon in Scotland while trying to treat them for lice and disease, according to internal Government memos.

Blunders by Norwegian multinational, Marine Harvest, have cost millions of pounds and led to over 600 tonnes of salmon having to be incinerated. The losses have contributed to a 16 per cent drop in the company's Scottish salmon production.

Campaigners have accused Marine Harvest of treating salmon cruelly, and warn that lice and diseases are "choking the Scottish salmon farming industry to death". They mock plans to double the size of the industry by 2030 as "sheer lunacy".

The worst incident took place in July and August on a salmon farm in Loch Greshornish on the Isle of Skye. Some 95,400 fish were killed by a new device called a thermolicer, which is designed to rid salmon of the sea lice that plague them.

But the way it does this – by suddenly immersing fish in water much warmer than they are used to – can also kill the fish themselves. What happened on Skye was explained in a memo on 12 September from Government officials to the Rural Economy Minister, Fergus Ewing.

The "sudden temperature change" caused by the thermolicer killed 95 per cent of the lice but also caused "significant mortalities" amongst the salmon, it said. Officials estimated that the losses cost Marine Harvest over £2.7 million.

"This report highlights the ongoing difficulties and costs faced by industry with regards to sea lice management," concluded the memo, which was released under freedom of information law.

Another 20,000 salmon were killed at Loch Greshornish fish farm by other attempts to rid them of sea lice using chemicals. There are concerns that lice are becoming increasingly resistant to chemical treatment.

In a second memo to Ewing on September 26, officials revealed more inadvertent deaths, this time at a Marine Harvest fish farm in Soay Sound off the Isle of Harris. Earlier that month 60,000 salmon had been killed by hydrogen peroxide used to treat them for amoebic gill disease.

Marine Harvest [admitted in April 2016](#): "All Marine Harvest Farms, their harvest station and processing plant are audited and approved under the RSPCA Freedom Food animal welfare scheme".


In other words, Freedom Food accredited salmon farms sponsor cruelty, animal torture and inhumane killing.

As Philip Lymbery, Chief Executive of Compassion In World Farming, [wrote after the Thermolicer welfare disaster](#) in November 2016:

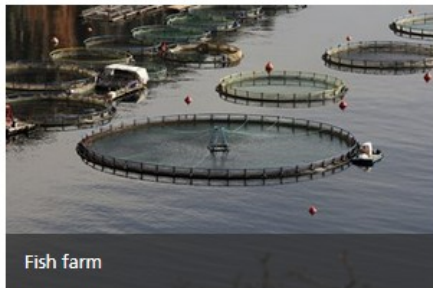
Philip Lymbery, Compassion CEO

ABOUT PHILIP BOOKS BLOG GUEST ARTICLES SPEAKING DATES

PHILIP LYMBERY > BLOG > 2016 > 11 > SCOTTISH INTENSIVE SALMON FARMING PLUMBS NEW DEPTHS



SCOTTISH INTENSIVE SALMON FARMING PLUMBS NEW DEPTHS




Reports that Scottish salmon farms have killed tens of thousands of fish accidentally

by overheating them have sent shockwaves through an industry already under fire for shooting seals.

Seals are all too often shot as part of 'predator control' around intensive fish farms that are effectively factory farms in the sea.

Now nearly a hundred thousand salmon are reported to have been killed after the use of a new device, the 'thermolicer'. The device was used in the latest desperate bid to rid intensively farmed fish from lice, a parasite infestation which is inevitable when so many fish are crammed in a confined space.

Information from the Scottish Government, received following a **Freedom of Information request**  by the Global Alliance Against Industrial Aquaculture (GAAIA), reveals that 95,000 fish died on a single Scottish fish farm following the use of a thermolicer.

The thermolicer procedure involves crowding the fish used to the cold coastal waters of Scotland, pumping them into heated water and then dumping them back into their seawater cages. Salmon would never normally experience such sudden temperature changes. Little wonder that so many seem to have died as a result.

Killing fish by overheating, whether accidental or not, is simply inhumane.

The use of rough handling and heat treatment to tackle problems of sea lice is unacceptable on welfare grounds.

Welcome

Compassion in World Farming campaigns to end factory farming. My new book, *Dead Zone*, explores the links between factory farming and the demise of our iconic wildlife, and what we can do to save it.

Philip Lymbery

c) Toxic Chemicals Killing Lobsters & Crustaceans:

In January 2017, [The Sunday Times revealed](#) a shocking increase in the use of toxic chemicals:

Salmon industry toxins soar by 1000 per cent

Mark Macaskill

January 1 2017, 12:01am,
The Sunday Times



Between 2006-16, farmed salmon production increased by 35 per cent while the use of chemicals to control flesh-eating lice rose 932 per cent.

The use of toxic chemicals to fight sea lice on Scottish salmon farms has soared by almost 1,000% in the past decade, according to official data that has sparked fresh criticism of the billion-pound industry.

Between 2006-16, farmed salmon production increased by 35% while the use of chemicals to control flesh-eating lice rose 932%.

They included compounds that have been linked to reduced fertility in wild salmon and mortality in shellfish such as lobsters.

Critics of salmon farming said this weekend that the growing use of chemicals to fight sea lice, a parasite that kills millions of farmed fish every year, raises serious questions about the industry's environmental impact.

It has rekindled calls for some of Britain's leading supermarkets to ban the sale of farmed salmon from parts of Scotland where sea lice infestations are "rampant" and pose a threat to the survival of wild salmon and sea trout.

"Scottish salmon farming is fighting a losing battle against chemically resistant sea lice," said Don Staniford of the Global Alliance Against Industrial Aquaculture. "The drugs don't work anymore. Sadly, Scotland's lobsters and other shellfish are collateral damage in the salmon farming industry's war on sea lice."

The latest figures, obtained under freedom of information from the Scottish Environment Protection Agency (Sepa), show that Scottish salmon farms used 45kg of chemicals in 2006 but this increased to 467kg in 2016.

Please see attached chemicals data obtained from the Scottish Environment Protection Agency in the next email.

The Sunday Times also [reported in February 2017](#) on staggering increases in the use of hydrogen peroxide on salmon farms:



THE SUNDAY TIMES

Record chemical use 'of concern' to salmon giant



Hydrogen peroxide tackles parasites but weakens the fish
DAVID CHESKIN/PA ARCHIVE

The world's largest salmon farmer has expressed "concern" over the use of chemicals to fight disease after a record 20m litres of hydrogen peroxide — a substance harmful to fish — were dumped into coastal waters around Scotland.

More than 160 farms resorted to the chemical in 2015 to tackle parasites such as sea lice, according to the Scottish Environment Protection Agency (Sepa).

Enough hydrogen peroxide was used to fill eight Olympic-size swimming pools, including more than 1m litres at a site operated by Marine Harvest, the Norwegian-owned firm.

On Friday, Marine Harvest said it is "concerned" by the industry's "increased use of medicines" to tackle parasites, which it said have flourished in recent years due to warmer coastal waters. The multibillion-pound firm said it is exploring new ways to protect farmed fish from deadly infections such as amoebic gill disease.

Hydrogen peroxide is regarded as environmentally safe as it quickly breaks down into its constituent parts of hydrogen and oxygen. The chemical does not kill parasites, but stuns them. As farmed fish knock against each other in crowded pens, the parasites fall off.

There is, however, evidence that the chemical harms fish. Academics from Bergen University in Norway recently presented a report showing that hydrogen peroxide weakens the immune system of fish by damaging gill tissue and protective mucosal layers. They warned that fish need at least two weeks to recover during which time they are susceptible to aquatic pathogens. In 2001, Compassion In World Farming (CIWF) warned that hydrogen peroxide posed “serious animal welfare drawbacks”.

The Sepa data, obtained by the Global Alliance Against Industrial Aquaculture, shows that hydrogen peroxide was used sparingly on Scottish salmon farms from 2002-2005, followed by two years when it was not used. In 2008, 95,000 litres were deployed and 2009 was another “blank” year.

However, since 2010, the chemical has been used in increasing quantities, sometimes with devastating effects. Last year, 60,000 salmon reportedly perished on Marine Harvest’s fish farm in Soay Sound, off the Isle of Harris, after the chemical was used to treat the parasites that cause amoebic gill disease.

In 2015, the latest year for which figures are available, 19.6m litres of hydrogen peroxide were used by Scottish fish farms. Marine Harvest depended most heavily on the chemical (8.4m litres) followed by the Scottish Salmon Company (4m litres) and Grieg Seafood (3.1m litres).

The biggest quantity used at a single site was just over 1m litres at Marine Harvest's Camas an Leim farm at Loch Torridon, on the west coast of Scotland. A Marine Harvest spokesman said the company used less hydrogen peroxide in 2016 (6.3m litres) despite farming more fish than in previous years.

He added: "We are concerned by the increased use of medicines and have taken steps to broaden non-medicinal treatment methods in salmon farming."

Grant Cumming, managing director at Grieg Seafood Shetland Ltd, said its increased use of hydrogen peroxide had been "driven by our desire to treat our salmon for sea lice at lower levels, which has meant more treatments, and our wish to minimise the use of medicines, which may persist for some time in the environment".

Philip Lymbery, the chief executive of CIWF, said: "We have long condemned the use of this chemical because it is known to cause suffering to farmed fish."

Following the Sunday Times article, Philip Lymbery (Chief Executive of Compassion In World Farming) [wrote](#):

Philip Lymbery, **Compassion** CEO



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2017

02

SCOTTISH SALMON FARMS POUR CHEMICALS ON PARASITES

SCOTTISH SALMON FARMS POUR CHEMICALS ON PARASITES



Sea lice – the scourge of the intensive salmon farming industry – are having a field day.

These tiny tadpole-like parasites eat away at the skin and scales of affected fish. The effect around the head can be so bad that the bone of the living fishes' skull is exposed – a condition known as the 'death crown'.

Sea lice represent the single biggest problem facing industrial fish farms. So much so that

companies in Scotland are reaching for ever more desperate measures to counteract them.

Wild salmon rid themselves of the lice naturally as they drop off when the fish enter freshwater on migration. For farmed salmon, caged in their tens of thousands, parasites

Welcome

Compassion in World Farming campaigns to end factory farming. My book, *Farmageddon*, explodes the myths behind our broken food system and sets out an alternative vision that will benefit animals, people and the countryside.

Philip Lymbery

have to be controlled using various methods from chemicals to mechanical devices.

I recently wrote about how nearly a hundred thousand salmon are reported to have been killed after the use of a new device, the 'thermolicer'. This contraption sucks salmon out of cold seawater and pumps them through heated water before dumping them back into the sea. The temperature shock is enough to dislodge the sea lice and clearly doesn't do much either for the health and welfare of the farmed fish themselves.

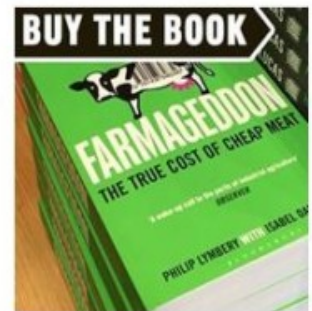
Now, according to the BBC, Scottish fish farmers have taken to using hydrogen peroxide 'bleach' in a bid to control sea lice. The use of hydrogen peroxide rose by 15 times between 2011 and 2015, reaching 42 litres of bleach per tonne of fish produced.

Hydrogen peroxide is bubbled through porous pipes into the cage containing crowded fish. It has been shown to be neither fully effective nor welfare-friendly. Hydrogen peroxide is a well-known irritant. Fish find it very stressful, and its application can cause significant mortality. As well as causing the fish to suffer, it is also not fully effective at removing lice. It works by stunning the lice rather than killing them. Successful treatment relies on the crowded fish knocking against each other or rubbing against the nets to dislodge the stunned lice. Any lice that are not removed simply recover.

As I recently told the Sunday Times, Compassion in World Farming has long condemned the use of Hydrogen peroxide because it is known to cause suffering to farmed fish.

It seems the industrial salmon farming industry is swimming in ever-decreasing circles trying to get on top of the parasite problems of its own making. For how much longer will we continue to see these factory farms in the sea?

[The Sunday Herald reported](#) on their front page in February 2017:



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**Revealed**
Scandal of
45 Scottish
lochs trashed
by pollution

- Toxic pesticides from fish farms pose risk to human health and wildlife
- Contaminated lochs include Fyne, Linnhe, Broom, Ewe and Torridon

Exclusive report: Page 10

 **SADIQ KHAN FORCED INTO HUMILIATING U-TURN**
OVER 'INDY VOTERS ARE RACIST' CLAIM **NEWS PAGE 4**

SCOTLAND TRIUMPH
FIRST SIX NATIONS
WIN OVER WALES
IN A DECADE
IN SPORT



OSCAR SPECIAL
HOW TO PARTY LIKE A
HOLLYWOOD STAR IN
YOUR LIVING ROOM
NEWS PAGES 12&13



[The Sunday Herald article](#) included:

Dr Richard Luxmoore, senior nature conservation adviser to The National Trust for Scotland, warned that emamectin was a neurotoxin that could kill invertebrates and was “highly toxic” to birds and mammals. “The environmental standards have been put there for a good reason,” he said.

“It is highly worrying that they have been breached so many times. This is yet more evidence that the chemical warfare waged by fish farms against sea lice has essentially been lost and the application of toxins to kill them is spiralling out of control.”

Dr Sam Collin from the Scottish Wildlife Trust agreed emamectin was a major concern. “It’s worrying that there have been so many breaches of the standards for its use,” he said.

“This particular chemical stays in the marine environment for a long time and is capable of causing harm to a wide variety of sea life, in particular invertebrates such as shellfish.”

In March 2017 [the Sunday Herald reported](#):

A major scientific study had found “unexpected” links between “very low” levels emamectin and the loss of crabs, lobsters and other crustaceans, Sepa said. The agency is now reviewing its environmental safety limits for the pesticide to check they provide “adequate environmental protection”.

The study, commissioned by Sepa from the Scottish Aquaculture Research Forum, concluded that the use of emamectin at fish farms “was associated with substantial, wide-scale reductions in both the richness and abundance of non-target crustacea”.

It said that “toxic effects occur at levels much lower than those that are currently detectable”, and suggested that there was no threshold below which emamectin would be harmless.

“The evidence suggests that benthic crustacea may not be adequately protected by the current regulation of emamectin use in Scottish salmon farms,” the study warned.

Sepa is now reviewing all fish farm licences and “tightening conditions” for the use of emamectin after discussions with the UK government’s Veterinary Medicines Directorate. “We are beginning the issuing of these new licences this week, and this will be completed by the end of April,” Sepa said.

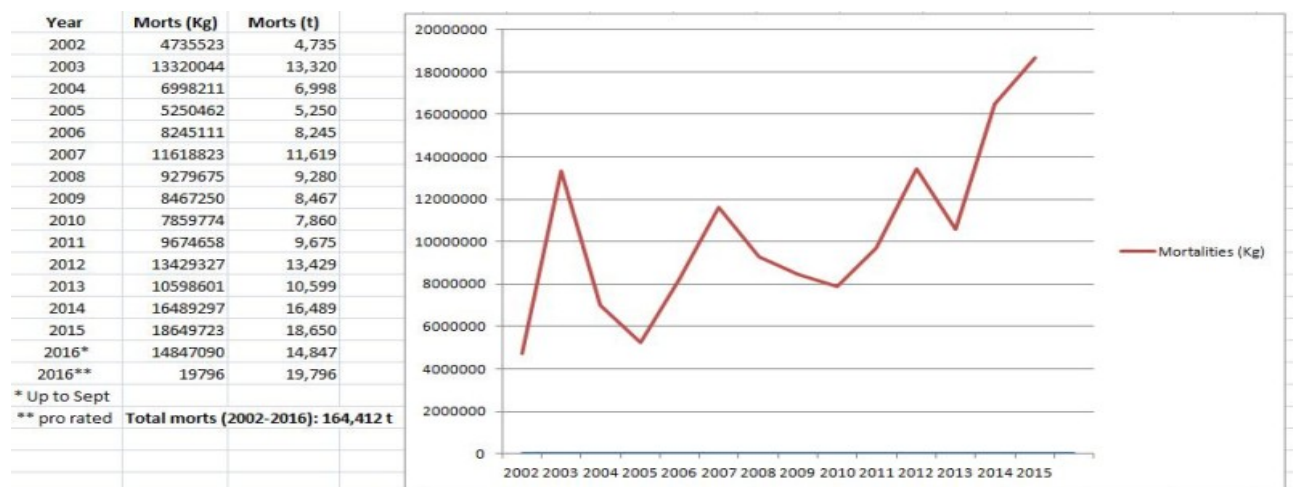
Sepa’s announcement was “welcome but overdue”, according to Dr Richard Luxmoore, the senior nature conservation adviser with The National Trust for Scotland: “It is worrying to see confirmation that these chemicals are having a seriously detrimental effect on marine wildlife over a far wider area than has previously been acknowledged,” he said.

In other words, Freedom Food accredited salmon farms using toxic chemicals such as Emamectin are killing lobsters across Scotland.



d) Mass Mortalities of Farmed Salmon:

Mortalities in 2016 are estimated at 20,000 tonnes (around 10 million farmed salmon) with a mortality rate in the sea of 23.7% ([according to the latest data published by the Scottish Government](#)).



Since 2002, a total of 164,412 tonnes of dead farmed salmon (equivalent to Scotland's salmon farming production in 2013) has occurred on Scottish salmon farms. Please see attached data on mortalities obtained from the Scottish Environment Protection Agency in the next email.

How many mortalities have occurred at Freedom Food accredited salmon farms is unclear but if Freedom Food has certified around two-thirds of Scottish salmon farming production for the last five years then the mort mountain at the door of Freedom Food is in the millions.

For example, here's mortality vs. production data sourced from the latest Scottish Government [2015 Fish Farm Production Survey](#):

Farmed salmon production (t)	Year	Mortalities (Kg)	Mortalities (t)	Year	Mortality rate (%)	# of salmon put to sea (millions)	Estimated # of morts (millions)
144,589	2002	4735523	4,735	2002	23.3	50.1	11.7
169,736	2003	13320044	13,320	2003	22	43.1	9.5
158,099	2004	6998211	6,998	2004	24.5	39	9.6
129,588	2005	5250462	5,250	2005	21.9	37.2	8.1
131,847	2006	8245111	8,245	2006	27.5	41.1	11.3
129,930	2007	11618823	11,619	2007	28.2	37.9	10.7
128,606	2008	9279675	9,280	2008	17.8	36.7	6.5
144,247	2009	8467250	8,467	2009	16.7	38.5	6.4
154,164	2010	7859774	7,860	2010	17.2	38.5	6.6
158,018	2011	9674658	9,675	2011	23	42.7	9.8
162,223	2012	13429327	13,429	2012	14.6	41.1	6
163,234	2013	10598601	10,599	2013	23.7	40.9	9.7
179,022	2014	16489297	16,489				
171,722	2015	18649723	18,650				
177,857 *	2016	14847090	14,847				

* industry estimate of projected tonnage based on stocks currently being on-grown (read 2015 Fish Farm Production Survey: <http://www.gov.scot/Resource/0050/00505162.pdf>)

Monthly mortalities (by weight only not number) for every salmon farm in Scotland are [available online via the Scotland's Aquaculture database](#). For example, one of the [latest data entries](#) details nearly 3,000 kg of morts at Marine Harvest's salmon farm on the Isle of Muck in December 2016:

Fish Farm Monthly Biomass and Treatments Details	
Year	2016
Month	December
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1109999/V3
Licence active at time of report	CAR/L/1109999
Report for Site	AMM1 Am Maol, Isle of Muck
Max licensed biomass on site (tonnes)	2500
Actual biomass on site (tonnes)	2448
Biomass Exceedance (tonnes)	0
Feed (kg)	456674
Mortalities (kg)	2967.8037400920

Another [data entry details](#) 123,454 kg of morts at Marine Harvest's salmon farm in Loch Greshornish in August 2016:

Fish Farm Monthly Biomass and Treatments Details	
Year	2016
Month	August
Submitted By	Marine Harvest (Scotland) Ltd
Licence Number	CAR/L/1002890/V6
Licence active at time of report	CAR/L/1002890
Report for Site	GRE1 Greshornish
Max licensed biomass on site (tonnes)	2195
Actual biomass on site (tonnes)	1387
Biomass Exceedance (tonnes)	0
Feed (kg)	130721
Mortalities (kg)	124453.8824990320

As Freedom Food accredits more and more Scottish salmon farming production it therefore follows that Freedom Food is sponsoring more and more mortalities and promoting a welfare

disaster. GAAIA does not see how such mortality can in any way, shape or form be in the public benefit or constitute Freedom Food's charitable aim of promoting animal welfare.

e) Seal Slaughter at Freedom Food Accredited Salmon Farms:

Evidence on the inhumane slaughter of seals at Freedom Food accredited salmon farms has already been cited. Suffice to say here that documents disclosed in April 2017 by Scottish Natural Heritage (a summary is available via [RSPCA/Freedom Food & Seal Killing FOI Backgrounder \(May 2017\)](#)) included:

In April 2016, there was a meeting of the [SASWG \(Salmon Aquaculture & Seals Working Group\)](#) at Marine Harvest's office in Rosyth (attendees included Freedom Food, RSPCA, SSPO and Waitrose). A paper circulated before the meeting - authored by [named redacted] of the Sea Mammal Research Unit at the University of St. Andrews included:

% seals shot by aquaculture by FF accredited farms

- **In 2011: c 60+ seals* c26%**
- **In 2015: 41 seals 52%**

*(no definite figure provided)

During 2015 the greater number of seals shot were by:

1. Moray Firth Management Group:	28
2. Usan Fisheries (Scottish Wild Salmon Company):	22
3. Marine Harvest (FF accredited)	18
4. Scottish Seafarms: (FF accredited)	15
5. Scottish Salmon Company: (supply Waitrose)	11

In April 2016, a three-year coastal netting ban was introduced to protect wild salmon. This will help protect wild stocks, but should also further significantly reduce shooting of seals. It will also focus more attention on aquaculture which was responsible for 49% of seals shot in 2015.

1. The biggest individual seal shooting companies in 2015 were both RSPCA - FF accredited salmon producers that supply both Sainsbury's and Waitrose
2. In 2014, (number to be provided by FF) almost 70% of seals shot by aquaculture were at FF accredited sites.
3. In 2015, 41 seals were reported shot to FF, 52% of those reported shot by aquaculture overall.

Moreover:

Data collected by Marine Scotland and disclosed by SNH ([Download SNH FOI 25 April 2017 document #7](#)) reveals that in 2016*:

63 salmon farms used anti-predator nets (39 used "false bottom"; 18 used "enclosed"; 8 used "double mesh" and 5 used "curtains")

142 salmon farms did not use anti-predator nets

i.e. 31% of salmon farms used anti-predator nets
69% of salmon farms did not use anti-predator nets

* Note that the exact period of data reporting is unclear: the application period is for 1 October 2016 to 30 September 2017; the licensing period is listed as 1 February 2017 to 31 January 2018 and the licence status of all the salmon farms is listed as "pending".

Here's the 142 salmon farms which did not use anti-predator nets:

1	FishFarmName	Reg #	SiteOwner	APNUsed	APNNotUsedReason
2	Ardcastle	FS0818	The Scottish Salmon Company	FALSE	ADD effective so not required
3	Ardgadden	FS0851	The Scottish Salmon Company	FALSE	ADD effective so not required
4	Ardyne	FS0559	The Scottish Salmon Company	FALSE	ADD effective so not required
5	Furnace	FS0567	The Scottish Salmon Company	FALSE	ADD sufficient so not required
6	Glenan Bay	FS0590	The Scottish Salmon Company	FALSE	ADD effective so not required
7	Gob a Bharra	FS0683	The Scottish Salmon Company	FALSE	ADD sufficient so not required
8	Lamlash Bay	FS0423	The Scottish Salmon Company	FALSE	ADD effective so not required
9	Meall Mhor	FS0091	The Scottish Salmon Company	FALSE	ADD effective so not required
10	Quarry Point	FS0698	The Scottish Salmon Company	FALSE	ADD effective so not required
11	Rubha Stillaig	FS0894	The Scottish Salmon Company	FALSE	ADD sufficient so not required
12	Sgian Dubh	FS1281	The Scottish Salmon Company	FALSE	ADD effective so not required
13	Strondoir Bay	FS1019	The Scottish Salmon Company	FALSE	ADD effective so not required
14	Strone	FS1056	The Scottish Salmon Company	FALSE	ADD effective so not required
15	Tarbert South	FS0767	The Scottish Salmon Company	FALSE	ADD effective so not required
16	Bay of Ham	FS0122	Cooke Aquaculture Scotland	FALSE	Not required
17	Lyrawa Bay	FS0054	Cooke Aquaculture Scotland	FALSE	Not required during the product
18	Pegal Bay	FS0031	Cooke Aquaculture Scotland	FALSE	Not used for the last cycle though
19	Loch Ba	FS0429	Scottish Sea Farms Ltd	FALSE	seals are a rare occurrence in th
20	Bastaness	FS1279	Cooke Aquaculture Scotland	FALSE	Available but not required at pr
21	Bastavoe South	FS0074	Cooke Aquaculture Scotland	FALSE	Not required at present but ava
22	Belmont	FS0472	Cooke Aquaculture Scotland	FALSE	Not required at present
23	Bow of Hascosay	FS0477	Cooke Aquaculture Scotland	FALSE	Not required at present
24	Burkwell	FS0960	Cooke Aquaculture Scotland	FALSE	Not required at present
25	Burrastow	FS0666	Cooke Aquaculture Scotland	FALSE	Not required at present

26	Cloudin	FS0088	Cooke Aquaculture Scotland	FALSE	Available but not required at present
27	Flaeshins	FS1275	Cooke Aquaculture Scotland	FALSE	Not required at present though though
28	Hogan	FS1053	Cooke Aquaculture Scotland	FALSE	Not required during the production pe
29	Holm of Gruting	FS0166	Cooke Aquaculture Scotland	FALSE	Available but not used at present
30	Mid Taing	FS0167	Cooke Aquaculture Scotland	FALSE	Not required at present but available
31	Mula	FS/0896	Cooke Aquaculture Scotland	FALSE	Not required
32	Turness	FS0451	Cooke Aquaculture Scotland	FALSE	Not required at present but available f
33	Uyea Isle	FS0382	Cooke Aquaculture Scotland	FALSE	Not required at present but available i
34	Vatsetter	FS/0407	Cooke Aquaculture Scotland	FALSE	Not required at present
35	Vee Taing	FS/1057	Cooke Aquaculture Scotland	FALSE	Not required at present though availab
36	Winna Ness	FS0871	Cooke Aquaculture Scotland	FALSE	Not required at present
37	North Sandwick	FS/0710	Cooke Aquaculture Scotland	FALSE	Not required at present
38	Balta Island	FS/0717	Cooke Aquaculture Scotland	FALSE	Not used at present but will form part
39	Kirkabister	FS 0802	Cooke Aquaculture Scotland	FALSE	Not required at present
40	Kempie Bay	FS0359	Scottish Sea Farms Orkney and	FALSE	Potential indiscriminate trapping of wi
41	Sian Bay	FS0361	Scottish Sea Farms Orkney and	FALSE	Potential indiscriminate trapping of wi
42	Puldrite	FS0813	Scottish Sea Farms Orkney and	FALSE	Potential indiscriminate trapping of wi
43	Noust Geo	FS0823	Scottish Sea Farms Orkney and	FALSE	Not allowed by SNH or planning author
44	Shapinsay	FS0860	Scottish Sea Farms Orkney and	FALSE	are also ineffective on strong tidal site
45	Bring Head	FS1023	Scottish Sea Farms Orkney and	FALSE	Potential indiscriminate trapping of wi
46	Toyness	FS1024	Scottish Sea Farms Orkney and	FALSE	Not allowed by SNH or planning author
47	Wyre	FS1294	Scottish Sea Farms Orkney and	FALSE	net
48	Bight of Foraness	FS0292	Hjaltland Seafarms Ltd	FALSE	Not allowed by SNH or planning author
49	Bomlo	FS1076	Hjaltland Seafarms Ltd	FALSE	Not required
50	Cole Deep	FS0489	Hjaltland Seafarms Ltd	FALSE	not required
51	East of Papa Little	FS1278	Hjaltland Seafarms Ltd	FALSE	not required
52	Linga	FS1027	Hjaltland Seafarms Ltd	FALSE	not required
53	North Voe	FS0946	Hjaltland Seafarms Ltd	FALSE	not required
54	Poseidon	FS0408	Hjaltland Seafarms Ltd	FALSE	not required
55	Swinning Voe 3	FS0903	Hjaltland Seafarms Ltd	FALSE	not required
56	Corlarach	FS1287	Hjaltland Seafarms Ltd	FALSE	not required
57	Gob na Hoe	FS1175	Hjaltland Seafarms Ltd	FALSE	not required
58	Leinish	FS0800	Hjaltland Seafarms Ltd	FALSE	not required
59	Eughlam	FS1233	The Scottish Salmon Company	FALSE	ADD effective so not required
60	Gousam	FS0998	The Scottish Salmon Company	FALSE	ADD effective so not required
61	Kyles Vuia	FS0927	The Scottish Salmon Company	FALSE	ADD effective so not required
62	Taranaish	FS0752	The Scottish Salmon Company	FALSE	ADD Effective so not required
63	Vacasay	FS1091	The Scottish Salmon Company	FALSE	ADD effective so not required
64	Vuia Beag	FS0411	The Scottish Salmon Company	FALSE	ADD effective so not required
65	Vuia Mor	FS1103	The Scottish Salmon Company	FALSE	ADD effective so not required
66	Trilleachan Mor	FS1118	The Scottish Salmon Company	FALSE	ADD effective so not required
67	Strome	FS0570	The Scottish Salmon Company	FALSE	ADD effective so not required
68	Plocrapol	FS1256	The Scottish Salmon Company	FALSE	ADD Effective so not required
69	Reibinish	FS1277	The Scottish Salmon Company	FALSE	ADD effective so not required
70	Scadabay	FS1293	The Scottish Salmon Company	FALSE	ADD effective so not required

71	Gravir	FS0242	The Scottish Salmon Company	FALSE	ADD effective so not required
72	Portree	FS0708	The Scottish Salmon Company	FALSE	ADD effective so not required
73	Druimyeon Bay	FS0336	The Scottish Salmon Company	FALSE	ADD effective so not required
74	East Tarbert Bay	FS1010	The Scottish Salmon Company	FALSE	ADD effective so not required
75	Geasgill	FS0839	The Scottish Salmon Company	FALSE	ADD effective so not required
76	Gometra	FS1267	The Scottish Salmon Company	FALSE	ADD effective so not required
77	Inch Kenneth	FS0593	The Scottish Salmon Company	FALSE	ADD effective so not required
78	Tuath	FS0617	The Scottish Salmon Company	FALSE	ADD effective so not required
79	Aird	FS0594	The Scottish Salmon Company	FALSE	ADD effective so not required
80	Kenmore	FS0050	The Scottish Salmon Company	FALSE	ADD effective so not required
81	Sgeir Dughall	FS1262	The Scottish Salmon Company	FALSE	ADD effective so not required
82	Greanamul	FS1282	The Scottish Salmon Company	FALSE	ADD effective so not required
83	Outer Eport	FS1254	The Scottish Salmon Company	FALSE	ADD effective so not required
84	Petersport	FS0340	The Scottish Salmon Company	FALSE	ADD Effective so not required
85	Trenay	FS0796	The Scottish Salmon Company	FALSE	ADD effective so not required
86	Uiskevagh	FS1255	The Scottish Salmon Company	FALSE	ADD effective so not required
87	Maragay Mor	FS1304	The Scottish Salmon Company	FALSE	Site only recently stocked
88	Eilean Grianain	FS1176	Marine Harvest (Scotland) Ltd	FALSE	Bi catch concerns
89	Inverawe (East) Et	FS1067	Dawnfresh Farming Ltd	FALSE	high currents risk of entanglement
90	Etive 3 (Port na M	FS1101	Dawnfresh Farming Ltd	FALSE	high currents, risk of entanglement
91	Etive 4	FS1112	Dawnfresh Farming Ltd	FALSE	high currents, risk of entanglement
92	Ardchattan Bay	FS0197	Dawnfresh Farming Ltd	FALSE	risk of entanglement of other ani
93	Etive 6	FS1288	Dawnfresh Farming Ltd	FALSE	risk of entanglement of other ani
94	Shuna SW (Rubha	FS1290	Kames Fish Farming Ltd	FALSE	Bi catch concerns
95	South Sound	FS0183	Scottish Sea Farms Ltd	FALSE	Operational
96	Vidlin North	FS0608	Scottish Sea Farms Ltd	FALSE	Operational
97	Loura Voe	FS0699	Scottish Sea Farms Ltd	FALSE	Operational
98	Holms Geo	FS0749	Scottish Sea Farms Ltd	FALSE	Operational
99	Slocka Ronas Voe	FS1018	Scottish Sea Farms Ltd	FALSE	Operational
100	Teisti Geo	FS1093	Scottish Sea Farms Ltd	FALSE	Operational
101	Bight of Bellister,	FS1121	Scottish Sea Farms Ltd	FALSE	Operational
102	Dury Voe	FS0033	Scottish Sea Farms Ltd	FALSE	Operational
103	Foreholm	FS0936	Scottish Sea Farms Ltd	FALSE	Operational
104	Snarraness	FS0400	Scottish Sea Farms Ltd	FALSE	Operational
105	HELLISAY	FS1261	Marine Harvest (Scotland) Ltd	FALSE	Bi catch concerns
106	Ornish	FS0531	Marine Harvest (Scotland) Ltd	FALSE	POLICY
107	SEAFORTH	FS1042	Marine Harvest (Scotland) Ltd	FALSE	BI CATCH CONCERNS
108	SOAY	FS0646	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
109	STULAIGH	FS1259	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
110	Tabhaigh	FS1297	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
111	Scotasay	FS0502	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
112	North Shore	FS1033	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
113	Raineach	FS1263	Marine Harvest (Scotland) Ltd	FALSE	policy
114	Marulaig Bay	FS0865	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
115	Groatay	FS1083	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
116	Grey Horse Chann	FS1122	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
117	Bagh Dail Nan Cea	FS0805	Marine Harvest (Scotland) Ltd	FALSE	bi catch concern
118	Polle Na Gille	FS0629	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns

119	Port Na Cro	FS0859	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
120	ARDINTOUL	FS0245	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
121	Ardnish	FS0249	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
122	CAIRIDH	FS0252	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
123	CAMAS GLAS	FS0413	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
124	CREAG AN T SAGA	FS0605	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
125	DUICH	FS0248	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
126	Gorsten	FS0237	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
127	GRESHORNISH	FS0015	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
128	HARPORT	FS0247	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
129	INVASION BAY	FS0212	Marine Harvest (Scotland) Ltd	FALSE	Bi Catch Concerns
130	KINGAIRLOCH	FS0241	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
131	LEVEN	FS0244	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
132	LINNHE	FS0240	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
133	LOCHALSH	FS0016	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
134	MacLean's Nose	FS0599	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
135	MAOL BAN	FS0519	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
136	Muck	FS1286	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
137	SCONSER	FS0602	Marine Harvest (Scotland) Ltd	FALSE	bi catch concerns
138	Colonsay	FS1296	Marine Harvest (Scotland) Ltd	FALSE	company policy
139	Lochmaddy	FS0853	Loch Duart Ltd	FALSE	STRONG TIDES
140	Sound of Harris	FS1260	Loch Duart Ltd	FALSE	STRONG TIDES
141	Loch Carnan	FS1280	Loch Duart Ltd	FALSE	STRONG TIDES
142	ISLE EWE	FS1084	Marine Harvest (Scotland) Ltd	FALSE	BI CATCH CONCERNS
143	TORRIDON	FS0234	Marine Harvest (Scotland) Ltd	FALSE	Bi Catch Concerns

The latest data ([published online by the Scottish Government](#)) on seals killed by salmon farms during 2016 reveals that the following sites shot seals but have not reported the use of Anti-Predator Nets (APN) in the last two licensing periods (encompassing 2015 and 2016 - as defined by [SNH FOI 25 April 2017 document #5](#) and [SNH FOI 25 April 2017 document #7](#)) casting doubt on the definition of "last resort" (i.e. salmon farmers are reaching for bullets before nets):

Bight of Bellister (Scottish Sea Farms) - "operational" was the reason given why APNs were not used

Cairidh (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Camas Glas (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Colonsay (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Creag an t Sagairt (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Eilean Grianain (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Gometra (The Scottish Salmon Company) - "ADD effective so not required" was the reason given why APNs were not used

Greshornish (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Hellisay (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Holms Geo (Scottish Sea Farms) - "operational" was the reason given why APNs were not used

Isle Ewe (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Kingairloch (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Linnhe (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Lochalsh (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Loch Carnan (Marine Harvest) - "tide too strong" was the reason given why APNs were not used

Maol Ban (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Marulaig (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Ornish (Marine Harvest) - "bi catch concerns" (sic) was the reason given why APNs were not used

Shapinsay (Scottish Sea Farms) - "indiscriminate trapping of wildlife" was the reason given why APNs were not used

Slocka Ronas Voe (Scottish Sea Farms) - "operational" was the reason given why APNs were not used

Spelve A (Scottish Sea Farms) - "practicality" was the reason given why APNs were not used

Sound of Harris (Loch Duart) - "tides too strong" was the reason given why APNs were not used

Swarta Skerry (Balta Island Seafare) - "have been tried previously but not considered effective" was the reason given why APNs were not used

Taranaish (The Scottish Salmon Company) - "ADD effective so not required" was the reason given why APNs were not used

Vidlin North (Scottish Sea Farms) - "operational" was the reason given why APNs were not used

Winna Ness (Cooke Aquaculture) - "no required" (sic) was the reason given why APNs were not used

Additionally, these salmon farms may have not used APNs during 2016 (it is impossible to say for sure given the lack of synchronicity between the data sets):

Djubawick (Cooke Aquaculture) - "not required at present, difficult to manage in highly tidal sites" was the reason given why APNs were not used

Fuinary (Scottish Sea Farms) - "practicality" was the reason given why APNs were not used

Kishorn West (Scottish Sea Farms) - "practicality" was the reason given why APNs were not used

Stead of Aithness (Cooke Aquaculture) - "not required at present due to low predation levels" was the reason given why APNs were not used

Walters/East Lismore (Scottish Sea Farms) - "practicality" was the reason given why APNs were not used

It seems clear that the majority of salmon farms which kill seals do NOT use anti-predator nets (i.e. they are NOT shooting seals as a "last resort" as claimed by the salmon farming industry and demanded via SSPO's [Code of Good Practice](#) and the [RSPCA Assured scheme](#)).

As GAAIA [stated in November 2015](#):

Buying RSPCA Assured salmon is sadly a sure-fire way of supporting the killing of seals in Scotland. As John Robins of [Save Our Seals Fund](#) wrote in July 2012:

"When you buy Scottish farmed salmon, even RSPCA endorsed Scottish farmed salmon, you pay for bullets to shoot seals."



f) Whale Killed at Freedom Food Accredited Scottish Sea Farms:

In 2014, it was [revealed](#) that "Scottish Rural College vets believe that a young humpback whale found drowned off the coast of Mull died after swimming into a fish farm" (operated by [Freedom Food accredited Scottish Sea Farms](#)).



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Humpback Whale Post Mortem Suggests Entanglement in Salmon Farm

Published Friday, 4th July 2014 in SAC Consulting news

SRUC vets believe that a young humpback whale found drowned off the coast of Mull died after swimming into a fish farm.

The post mortem results suggest the animal became trapped under a salmon pen and subsequently drowned.

Aided by staff from the Hebridean Whale and Dolphin Trust and Aberdeen University's Lighthouse Field Station, the post mortem was carried out by Dr Andrew Brownlow from Scotland's Rural College, which coordinates the **Scottish Marine Animal Stranding Scheme**. Every year over 400 marine mammals are stranded around the coast of Scotland and any cases suitable for post mortem are examined by the project.

There have only been six recorded humpback whale strandings in Scotland since 1992 (17 in the UK) and this is the first where a post mortem has been carried out. The whale was a juvenile male, almost 7m long (23ft) and weighing just under seven tonnes (6900kg). The stomach lining suggested little solid food had been ingested in the past so it is possible that the whale was still receiving milk from his mother.

The animal was found dead beneath the nets of a salmon pen. Due to the logistics involved in recovery it was around 36 hours after discovery before the animal could be post mortemed, however it was still in relatively fresh condition and therefore a reasonably confident diagnosis could be reached. The post mortem findings are consistent with a peri-weaning, maternally-attached animal which underwent an acute death. The observed pathology and stranding history would be consistent with the whale becoming trapped beneath a salmon pen and subsequently drowning.

The report also notes that young humpback whales are very inquisitive creatures which could explain why the animal was attracted to the salmon farm located at Fishnish on Mull.

"The observed pathology and stranding history would be consistent with the whale becoming trapped beneath a salmon pen and subsequently drowning," [reported](#) the Press & Journal (5 July 2014). "The report also notes that young humpback whales are very inquisitive creatures which could explain why the animal was attracted to the salmon farm located at Fishnish on Mull".

NEWS

5 July 2014

Humpback Whale died after swimming into fish farm



The humpback whale died after swimming into a fish farm

By [Rita Campbell](#)

Tags

[Hebridean W...](#)

[Humpback W...](#)

[Islands](#)

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A young humpback whale found drowned off the coast of Mull died after swimming into a fish farm, vets believe.

Scotland's first post-mortem of a humpback whale was carried out by Dr Andrew Brownlow from Scotland's Rural College (SRUC). The results suggest the animal became trapped under a salmon pen and subsequently drowned.

BBC News [reported](#) (4 July 2014):

4 July 2014 Last updated at 15:38



Humpback whale drowned off Mull 'after getting trapped'



The young whale was examined in Scotland's first post-mortem on a humpback

A young humpback whale found dead in the sea off Mull may have drowned after it got trapped under a fish farm pen, the results of a post-mortem suggest.

Related Stories

The post mortem was carried out on 26 June 2014 - here's a photo courtesy of the [Hebridean Whale & Dolphin Trust](#):



Read more via "[Salmon Farming Kills Whales!](#)"

4) Freedom Food Accounts for ca. 70% of Scottish Salmon Farming Production

If Freedom Food attempt to wriggle off the hook by claiming that the animal welfare problems of the Scottish salmon farming industry are nothing to do with them, please note that around two-thirds of Scottish salmon farming production is accredited by Freedom Food. Moreover much of the other third of the industry is certified by the [Soil Association](#), [Label Rouge](#) and the [Aquaculture Stewardship Council](#) (which all claim to have the highest standards).

The actual number and percentage of Scottish salmon farms accredited via Freedom Food is unclear. However, it appears that ca. 70% of Scottish salmon farming production has been the figure for the last five years or so (despite claims by the industry that it is higher).

For example, the [Scottish Salmon Producers Organisation said in 2012](#): "78% of Scottish salmon is now farmed to the RSPCA's higher welfare standards".

The [Salmon & Trout Association reported in 2013](#) stated: "The Scottish Salmon Producers Organisation (SSPO) states that more than 90% of Scottish salmon will be farmed to RSPCA Freedom Food welfare standards within the next two years".

Annual reports published by Freedom Food give a better handle on the % of the Scottish salmon farming industry accredited via Freedom Food:

[2015 Annual Report](#): 233 million fish; 67% of Scottish salmon

[2014 Annual Report](#): 324 million fish; 70% of Scottish salmon

[2013 Annual Report](#): 172 million fish; "Over two-thirds coverage"

[2012 Annual Report](#): 114 million fish; No data on % of Scottish salmon

Since Freedom Food and the RSPCA have stubbornly refused to name all the salmon farms accredited (read GAAIA's letters to the RSPCA & Freedom Food dated [November 2015](#); [August 2015](#); and [July 2012](#)), a full list of salmon farm sites is not available. As part of the Scottish Charity Regulator and the Charity Commission's investigation of this complaint it would be advisable to demand a full list of Freedom Food accredited salmon so as to assess the veracity of the information provided in this letter and also the data supplied in the next email.

However, based upon internet searches, it seems clear that:

- All [Marine Harvest](#) salmon farms are Freedom Food accredited
- [Scottish Sea Farms](#) is Freedom Food accredited
- [Grieg Seafood](#) is Freedom Food accredited
- [Scottish Sea Farms](#) is Freedom Food accredited
- [Wester Ross Fisheries](#) is Freedom Food accredited
- [Loch Duart](#) is Freedom Food accredited
- [Cooke Aquaculture](#) is Freedom Food accredited
- [The Scottish Salmon Company](#) has at least previously been Freedom Food accredited

In the first instance (as we have it on the authority of Marine Harvest themselves that ALL their salmon farms are Freedom Food accredited) you could start by juxtaposing the data on the use of Anti-Predator Nets (APN) and Acoustic Deterrent Devices (ADDs), for example, in the Excel spreadsheet provided by Scottish Natural Heritage (obtained from Marine Scotland) with Marine Harvest sites; namely:

ARDINTOUL
Ardnish
Bagh Dail Nan Cean
CAIRIDH
CAMAS GLAS
Colonsay
CREAG AN T
SAGAIRT
DUICH
Eilean Grianain
Gorsten
GRESHORNISH
Grey Horse Channel
Groatay

HARPORT
HELLISAY
INVASION BAY
ISLE EWE
KINGAIRLOCH
LEVEN
LINNHE
LOCHALSH
MacLean's Nose
MAOL BAN
Marulaig Bay
Muck
North Moine
North Shore
Ornish
Polle Na Gille
Port Na Cro
Raineach
SCONSER
Scotasay
SEAFORTH
SOAY
STULAIGH
Tabhaigh
TORRIDON

And by visiting supermarkets you could ascertain which salmon farms are Freedom Food accredited.

Photos of Salmon & Trout Conservation UK

Serving suggestion

of a pack (as sold)

SATURATES	SUGARS	SALT
3.0g	<0.5g	1.68g
5%	<1%	28%

% of the Reference Intakes

per 100g: Energy 787kJ/188kcal

RSPCA ASSURED

CERTIFICATION MARK

HIGH IN OMEGA 3

Responsible sourced from

Isle of Muck AEY5613-65

Use by

15 May 7096-21-46 MV4

Keep refrigerated

Like Comment Share Options Send in Messenger

Sainsbury's
Taste the Difference

OAK SMOKED SCOTTISH SALMON
Responsible sourced

TASTE TESTED BY CUSTOMERS

Responsible sourced from

BAGH A'CHAISE

Pack price Use by

19 DEC

Keep refrigerated

of a pack

ENERGY (kJ)	SATURATES	SUGARS	SALT
850	3.0g	0.5g	1.68g
18%	5%	<1%	28%

% of the Reference Intakes

In conclusion, please revoke the charitable status of Freedom Food Limited. Freedom Food accreditation of Scottish salmon farms provides precious little public benefit to residents of Scotland or the UK but plenty of private benefits to foreign-owned corporations such as [Marine Harvest](#) (Norwegian), [Scottish Sea Farms](#) (Norwegian), [The Scottish Salmon Company](#) (Swiss/Norwegian/Monocan), [Cooke Aquaculture](#) (Canadian) and [Grieg Seafood](#) (Norwegian). It is abundantly clear that Freedom Food is driven by commercial rather than charitable aims. Please put an end to the shameless scam of Scottish salmon masquerading under the Freedom Food label as welfare-friendly.

Freedom Food farmed salmon is dripping with the blood of hundreds of seals, millions of farmed salmon mortalities and has been shown by scientific research to be impacting on lobsters, whales and porpoises amongst other animals. Please send the message to Freedom Food Limited (and the [corporate giants who are hiding behind the RSPCA Assured logo](#)) that the [multi-million pound Scottish salmon farming industry](#) is not a charity case.

Finally, as GAAIA wrote in a [letter to Her Majesty the Queen \(as royal patron of the RSPCA\) in 2015](#):

Finally, I implore you to do everything in your power to end the RSPCA's lethal policy. I have copied into this letter the RSPCA's [Honorary vice-presidents](#); [Vice-presidents](#) and [RSPCA Council](#) in the hope that animal protection rather than commercial profit can be the RSPCA's guiding philosophy once again. The RSPCA's [founding fathers](#) including William Wilberforce and Rev. Arthur Broome as well as Queen Victoria (who [granted royal patronage in 1840](#)) are surely turning in their grave at the RSPCA's shameful policy of killing seals.



Further background on this vital issue is available online via:

- ["Staniford calls on RSPCA to drop Marine Harvest, Scottish Sea Farms, SSC"](#)
- [Press Release: "Closing the Net On 'Seal-Friendly' Scottish Salmon - last orders on the RSPCA's abuse of 'last resort' killing of seals?"](#)
- [Herald: "RSPCA defend record as anti-seal cull campaigners allege salmon farms are not 'last resort' killers"](#)
- [Dear RSPCA, please wash the blood of Scottish seals off your hands!](#)
- [Video Message to the RSPCA - stop the killing of seals on salmon farms!](#)
- [Photos: RSPCA Assured Seal Killers!](#)
- ["Anti-salmon farm campaigners petition Queen over RSPCA's seal-shooting sanction"](#)
- [Petition to the RSPCA: End your support for the killing of Scottish seals!](#)
- [Press Release: "RSPCA Savaged Over Seal Killing in Scotland"](#)
- [Letter to Her Majesty the Queen](#)
- [RSPCA Assured Seal Killers!](#)
- [RSPCA upsets people by saying seal shooting is OK](#)
- [RSPCA attacked for its policy on seal shooting](#)
- [RSPCA: Seals should be shot as an 'absolute last resort' to protect salmon](#)

If you require any further information please do not hesitate to contact me.

Please provide an acknowledgement of receipt of this complaint.

Please email your reply and any queries to dstaniford@gaaia.org (I am travelling extensively over the next six months and will not be picking up mail).

Yours sincerely,

Don Staniford

Director of the [Freedom For Fish](#) campaign and the [Global Alliance Against Industrial Aquaculture](#)



FREEDOM FOR FISH

SEALS • PORPOISES • WHALES