



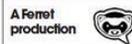
To: Police Scotland, Scottish Ministers, RSPCA Assured, RSPCA, SSPCA and M&S
Subject: Prosecution Vs. Illegal Killing of a Seal by Scottish Sea Farms in Orkney?
Date: 18 June 2023

What action is being taken against Scottish Sea Farms (Norskott Havbruk) for the illegal killing of a seal at Wyre salmon farm in Orkney in October 2022?



You may have read about the illegal killing of a seal by Scottish Sea Farms at their RSPCA Assured Wyre salmon farm in Scapa Flow in Orkney in [today's Sunday National](#):

Concerns raised over killing of seal at fish farm



BY BILLY BRIGGS

THE killing of a seal at an Orkney fish farm was not "proportional and justifiable response" and may have breached the law, according to a report seen by The Ferret.

The seal was shot in the face last October at Wyre Marine Farm, Scapa Flow, which is run by Scottish Sea Farms (SSF), a company which farms salmon.

Killing a seal with a gun to protect farmed salmon in Scotland has been illegal since February 2021, after the Scottish Government stopped granting licences to people to shoot them. But there are some exemptions under the law which allow seals to be killed humanely in order to "alleviate suffering".

SSF told The Ferret it had no choice but to "humanely euthanise" the seal after it became trapped in a pen. Animal welfare campaigners said more could have been done to save the seal and it was "unacceptable that salmon farmers are still killing seals". They have called for an investigation.

Seals were previously shot by licensed farmers to prevent them breaking into salmon pens and eating the fish, but killing them proved controversial. Ministers stopped granting licences for the shooting of seals due to fears the US would stop importing Scottish salmon. America is banning imports from countries that allow seals to be killed to protect fisheries. Scotland's salmon exports to the US are worth nearly £200 million each year.

The fish farming industry insists it takes animal welfare seriously and has been investing in non-lethal deterrents for seals "for years".

(FOI) request by the anti-fish farm campaigner, Don Stanford. The government response revealed that a seal was shot and killed by a licensed marksman on 14 October 2022.

The documents show that on October 17, 2022, SSF advised the Scottish Marine Animal Strandings Scheme (SMASS) that a seal had been shot. SSF wrote: "In accordance with Section 108 of the Marine Scotland Act 2010, I hereby notify that at approximately 15:41 hours on October 14, 2022, a qualified holder of a firearms licence euthanised a seal at Wyre Marine Farm, Orkney. This action was undertaken in the presence of an independent qualified veterinarian and an action taken to alleviate the suffering of the grey seal."

A post-mortem was subsequently conducted on the seal at Glasgow University by SMASS. Its report revealed a bullet entered the seal under its right eye. SMASS noted that from a welfare aspect, the animal was killed with a single shot and "died almost instantaneously".

However, based on a review of the evidence and discussion with St Andrews University's Sea Mammal Research Unit, and the "marine mammal community", SMASS concluded it was "difficult to support the conclusion that this animal was suffering to the extent that euthanasia was a proportional and justifiable response".

The author of SMASS's report wrote: "My opinion, therefore, is that the actions followed by Scottish Sea Farms do not fall under the exemptions listed under section 108 of the Marine Scotland Act 2010. It appears that there were several opportunities missed to engage the wider marine mammal community in the management of this event."

The seal appeared to be in "recent body condition" with no underlying disease, SMASS said, and there

the seal pen. It appeared to be feeding well and showed no evidence of stress or disease.

"The seal had entered the pen on October 8, and euthanasia was made six days later, SMASS said. It did not appear that SSF attempted to seek advice during this time from rescue groups or those experienced in seal behaviour."

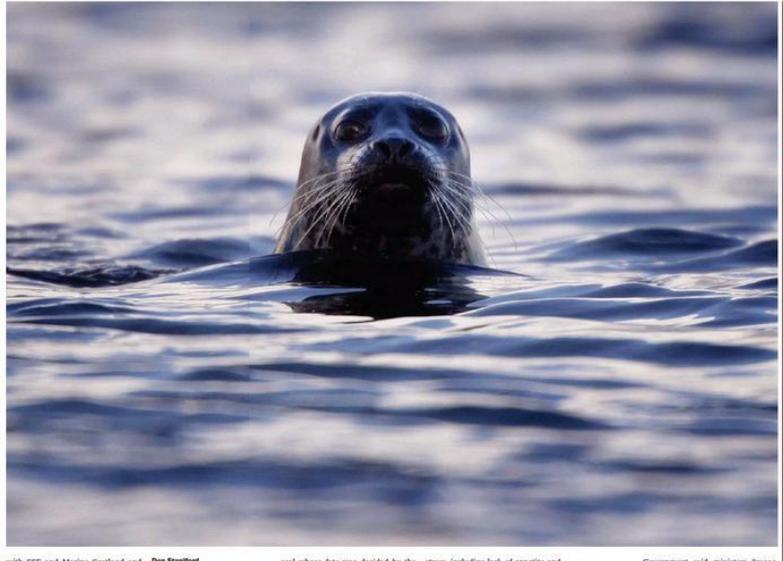
"It was not explained why a temporary haul out solution could not be securely fixed in the pen in such a way as it avoided damage to the pen infrastructure, SMASS said. "There was no video or photographic footage taken of the seal in the pen prior to euthanasia which could support the assertion the animal was suffering."

A request was made to Marine Scotland and SSF for details of any guidance or protocols for situations where seals are free swimming within fish farm pens, but this information was not available, SMASS added.

The FOI reply said that SSF notified the Scottish Government of the killing in an email on October 14. The firm wrote: "This action was undertaken in the presence of an independent qualified veterinarian. The action was instructed by Scottish Sea Farms following receipt of independent (external company) veterinary advice that to alleviate the suffering of the seal the correct action was to take was to euthanise the animal."

The vet who attended the incident at Wyre Marine Farm also produced a report which said five seals entered a fish pen at the fish farm through its netting.

Four seals later vacated the pens but one remained for six days, despite repeated attempts by SSF to remove the seal using "various methods". These included the crew using "noise and the presence of boats, engines and divers to try and encourage the seal to leave the pen". The vet noted that



Don Stanford, director of Scammon Scotland, left, said fish farms and the Scottish Government have "bled over the killing of seals".

Don Stanford, director of Scammon Scotland, left, said fish farms and the Scottish Government have "bled over the killing of seals".

with SSF and Marine Scotland and advised that the animal should be euthanised as it had been trapped in the pen for seven days.

However, Freddy Bowen-Rate, secretary of campaign group Animal Concerns, argued more could have been done, pointing out that section 108 of the Marine Scotland Act 2010 states that ending a seal's life is only permissible to "alleviate suffering if there is no "reasonable chance" of recovery.

He added: "We have long held a strong stance against the salmon farming industry – and cases like this are one of the many reasons why. An innocent, healthy seal who had wandered into a fish pen with its group due to inadequate netting, ended an

seal whose fate was decided by the repeated failed human attempts to release it."

Bowen-Rate added that Animal Concerns will be pushing for a "thorough investigation".

Don Stanford, director of Scammon Scotland, claimed that the salmon farming industry and the Scottish Government have "bled over their hands over the killing of seals" in Scotland. "Those responsible for the slaughter of seals must be held to account – under the letter of law that means a five-year prison sentence and a whipping fine," he added.

Arne Anderson, head of sustainability and development at Scottish Sea Farms, said that "every attempt was made to encourage the seal out

stress, including lack of appetite and movement, we sought the opinion of an independent vet who advised that the only course of action remaining was to humanely euthanise the animal – not the outcome anyone wanted but the right and proper thing to do to alleviate any further suffering."

THE Sea Mammal Research Unit told The Ferret it is "critical" to minimise the likelihood of seals gaining access to fish farm cages. Its statement added: "Although seals getting into fish cages is a rare occurrence, it unfortunately does happen. Thus, urgent work is required to identify and develop safe ways to release seals from fish cages

Government said ministers "recognise the challenges" faced by the aquaculture sector to both manage seal intrusions and to ensure the health and welfare of fish.

They added: "In some limited circumstances seals may become trapped in fish farm pens for extended periods, despite efforts to remove them.

"In such cases, and where there is concern for the seal's welfare, it is for the standing vet to determine the most appropriate course of action to alleviate any suffering since they are best qualified to assess welfare in the specific circumstances.

"We encourage the sector to continue to work to identify non-lethal measures that provide effective two

The news story is sourced from a [damning Freedom of Information disclosure from the Scottish Government dated 19 May 2023](#).

"There was no evidence the animal had been suffering whilst in the seal pen," [wrote the Scottish Marine Animal Strandings Scheme in a post mortem report dated 15 November 2022](#). "It appeared to be feeding well and showed no evidence of stress or disease. The animal entered the net on the 8th October, and euthanasia was made six days later. It does not appear that SSF (Scottish Sea Farms) attempted to seek advice during this time from rescue groups or those experienced in seal behaviour and response. Prior to electing to euthanize this animal it is unclear what further attempts were made to enable the seal to leave the pen. It was not explained why a temporary haul out solution could not be securely fixed in the pen in such a way as it avoided damage to the pen infrastructure. There was no video or photographic footage taken of the seal in the pen prior to euthanasia which could support the assertion the animal was suffering."

"Based on a review of the available evidence, and discussions with colleagues from SMRU [Sea Mammal Research Unit] and the wider marine mammal community, I find it difficult to support the conclusion that this animal was suffering to the extent that euthanasia was a proportional and justifiable response," [wrote the Scottish Marine Animal Strandings Scheme in an email attaching the post mortem report dated 15 November 2022](#). "My opinion, therefore, is the actions followed by

Scottish Sea Farms do not fall under the exemptions listed under Section 108 of the Marine (Scotland) Act 2010. It appears that there were several opportunities missed to engage the wider marine mammal community in the management of this event.”

“We weren’t contacted by them (Scottish Sea Farms) ahead of the decision to shoot” [wrote a Scottish Government official \[name redacted\] in Marine Conservation in October 2022.](#)



Scottish Sea Farms is [joint owned by the Norwegian companies SalMar and Leroy](#) and is called Norskott Havbruk – [which has traded under the name Scottish Sea Farms since 2001](#) – with the head vet ([Ronnie Soutar](#)) [acting as Chairperson of the Scottish SSPCA](#) from his [appointment in 2018 until he stepped down in June 2022.](#) Scottish Sea Farms (Norskott Havbruk) is [certified as ‘welfare friendly’ via RSPCA Assured](#) and is [exclusive Scottish salmon supplier to M&S.](#)



The [RSPCA’s latest policy condones the killing of seals by salmon farms](#) even though the killing of seals in Scotland [became illegal in February 2021.](#) Trigger-happy Scottish Sea Farms (Norskott Havbruk) – a [leading member of the trade body Salmon Scotland](#) - is [fully aware of the illegal nature of seal killing.](#)

In 2018, [M&S named the Scottish Sea Farms’ team at Wyre in Orkney as its ‘Outstanding Producer of the Year’ in the Farming for the Future Awards 2018](#). The M&S award [cited ‘Ethics’](#) and [praised the RSPCA Assured Wyre salmon farm for “developing a predator resistant containment system which reduced the number of seal attacks”](#).



The Wyre salmon farm was only [established in 2015](#) and has already killed multiple seals. Scottish Salmon Watch [reported in March 2021](#) on the killing of seals – including two seals killed at Wyre in Orkney and at other salmon farms operated by Scottish Sea Farms:

Species common	Date Found	Location	Local Authority	Findings	Findings for WEB
Grey seal	14/10/2020	Wyre Scottish Sea Farms	Orkney	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	28/05/2020	Wyre	Orkney	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	04/05/2020	Vidlin Scottish Sea Farms	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	30/04/2020	Vidlin Scottish Sea Farms	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Seal (indeterminate species)	28/02/2020	Vidlin	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	04/04/2020	Vidlin	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	03/05/2020	Swarta Skerry Scottish Sea Farms	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	24/03/2020	Swarta Skerry	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Grey seal	25/03/2020	Swarta Skerry	Shetland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Harbour seal (Common seal)	05/05/2020	Loch Linnhe Scottish Seafarms	Argyll and	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Harbour seal (Common seal)	08/05/2020	Loch Kishorn Scottish Sea Farms	Highland	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic
Harbour seal (Common seal)	28/03/2020	Isle of Shuna Loch Linnhe	Argyll and	Physical Trauma: Shot (Known)	Physical Trauma: Anthropogenic

‘Intelligence’ reports collated by the Scottish Government (and disclosed via FOI on 19 May 2023) [detailed nine incidents involving seals found in fish farms between June 2021 and November 2022](#) – including at Wyre in Orkney (Scottish Sea Farms), Sian Bay in Loch Eriboll (Scottish Sea Farms), Greanem and Colonsay (Mowi), Lamlash Bay on the Isle of Arran (Bakkafrost), Airds Point in Loch Etive (Dawnfresh) and Loch Spelve on the Isle of Mull (Scottish Sea Farms):

Report Urn	Report Date	Intelligence Type	Content
INTEL/002595/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 16/11/2022 provides that On 15/11/2022 three seals were found in a cage at Owner - Dawnfresh farming Site - Airds Point Airds Point Etive 4 Loch Etive Trout Farm Inverawe Argyle PA351HU A hole was discovered in a net Net repaired immediately by divers No fish reported to have escaped. Intel Officer Note – Incident 0000128/2022
INTEL/002594/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 19/10/2022 provides that On 18/10/2022 two seals were found within pen 12 at Owner - Scottish Sea Farms Site name -Wyre Wyre Orkney Regional Office Scapa Orkney KW151SD the seals were encouraged out a hole around 300mm in diameter thought to be how the seal's entered. Net repaired immediately by divers No fish reported to have escaped. Intel Officer Note – Incident 0000126/2022
INTEL/002593/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 14/10/2022 provides that On 28/09/2022 a seal was found within a pen at Owner - Scottish Sea Farms Ltd Site - Sian Bay Sian Bay Loch Eriboll Port Chamuill Lairg Orkney IV274UE The seal is thought to have entered between bottom of the handrail and headline on net (above water line) No fish reported to have escaped. Intel Officer Note – Incident 0000125/2022
INTEL/002592/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 14/10/2022 provides that On 05/10/2022 a seal was found within pen 1 Owner - Scottish Sea Farms Site name - Wyre Wyre Orkney Regional Office Scapa Orkney KW151SD The seal was encouraged out a hole around 300mm in diameter thought to be how the seal entered. Net repaired immediately by divers No fish reported to have escaped. Intel Officer Note – Incident 0000124/2022
INTEL/002591/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 14/10/2022 provides that On 05/10/2022 three seals were found within pen 12 at Owner - Scottish Sea Farms Site name -Wyre Wyre Orkney Regional Office Scapa Orkney KW151SD The seals were encouraged out a hole around 400mm in diameter thought to be how the seals entered. Net repaired immediately by divers No fish reported to have escaped. Intel Officer Note – Incident 0000123/2022
INTEL/002588/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 17/06/2022 provides that On 16/02/2022 a seal was found within cage 5 at Owner - Mowi Scotland Ltd Site Name – Greanem Colonsay Stob Ban House Glen Nevis Business Park Colonsay Argyle & Bute PH336RX, It is suspected that the seal gained entry through a 1m tear around 12 meters down thought to be caused by the froyer rings during the last passive grade. 15,00 – 20,000 Fish Escaped Net repaired on the same day. Intel Officer Note – Incident 000091/2022
INTEL/002586/2022	23/11/2022	Aquaculture	AQUACULTURE – FISH ESCAPE Intelligence received on the 18/02/2022 provides that On 15/02/2022 a seal was found within cage C9 at Owner -The Scottish Salmon Company Site Name – Lamlash Kingscross By Brodick Isle of Arran KA278RG after clawing at the stitching the seal gained entry to pen C9 Divers were on-site and assisted in removing the seal. No fish assessed to have escaped Intel Officer Note – Incident 000015/2022
INTEL/002521/2022	16/11/2022	Farmed Fish Escapes	FARMED FISH ESCAPES - LOCH ETIVE Intelligence received on 16/11/2022 provides that on 15/11/2022, three seals were found within a cage at Airds Point Etive 4 Loch Etive Trout Farm Inverawe Argyll PA351HU A hole was found and repaired.
INTEL/000362/2021	03/06/2021	Marine Licencing	A report has been received that a seal was shot inside a salmon cage in Loch Spelve on the 17th March 2021. It's pup was seen outside the cage. There is no information on what happened to the carcass. Also reported to Police Scotland.

Another document [disclosed by the Scottish Government via FOI on 19 May 2023](#) detailed the Marine Scotland Act 2010 Section 107-109:

Appendix 3 : Marine Scotland Act 2010 Section 107-109.

<https://www.legislation.gov.uk/asp/2010/5/part/6/crossheading/offence-killing-injuring-or-taking-seals>

107Offence: killing, injuring or taking seals

Killing, injuring or taking a live seal (intentionally or recklessly) is an offence.

Commencement Information

I1S. 107 in force at 31.1.2011 by [S.S.I. 2010/230, art. 4\(a\)](#)

108Exceptions: alleviating suffering

(1)It is not an offence under section 107 for a person to end a seal's life humanely (or to injure a seal when attempting to do so) if—

(a)it has been seriously disabled (otherwise than by the person's unlawful conduct),

(b)it has no reasonable chance of recovering, and

(c)ending its life—

(i)is the only satisfactory way to end its suffering, and

(ii)is not detrimental to the maintenance of the population of any species of seal at a favourable conservation status in their natural range (within the meaning of Article 1(e) of the Habitats Directive).

(2)It is not an offence under section 107 for a person to take a seal (or to kill or injure a seal when attempting to take it) if—

- (a) it has been disabled (otherwise than by the person's unlawful conduct),
 - (b) it is (or is to be) taken only in order to—
 - (i) tend it with a view to releasing it after it has recovered, or
 - (ii) release it after it has been tended,
 - (c) it is (or is to be) taken in a manner and in circumstances unlikely to cause the seal to suffer unnecessarily, and
 - (d) taking it—
 - (i) is the only satisfactory way to help it to recover, and
 - (ii) is not detrimental to the maintenance of the population of any species of seal at a favourable conservation status in their natural range (within the meaning of Article 1(e) of the Habitats Directive).
- (3) It is the duty of a person who kills, injures or takes a seal in a manner which is lawful by virtue of this section to report the matter to the Scottish Ministers as soon as reasonably practical after doing so.
- (4) Failure to comply with the reporting duty is an offence.

Commencement Information

[12S. 108](#) in force at 31.1.2011 by [S.S.I. 2010/230](#), [art. 4\(a\)](#)

109 Exceptions: licensed activity

It is not an offence under section 107—

- (a) to kill or take a seal in accordance with a seal licence,
- (b) to take a seal in order to, or to injure a seal when attempting to, kill it in accordance with a seal licence,
- (c) to kill or injure a seal when attempting to take it in accordance with a seal licence, or
- (d) to do anything in accordance with a licence granted under regulation 44 of the Conservation (Natural Habitats, &c.) Regulations.

Commencement Information

[13S. 109](#) in force at 31.1.2011 by [S.S.I. 2010/230](#), [art. 4\(a\)](#)

This is not the first time that Scottish Sea Farms – aided and abetted by Scottish Government officials – has killed a seal illegally. In December 2021, a “suitably qualified marksman” killed another seal at the same salmon farm at Wyre in Scapa Flow, Orkney, operated by Scottish Sea Farms:

From: Palmer MR (Mike) <Mike.Palmer@gov.scot>
Date: Friday, 24 Dec 2021, 2:46 pm
To: [Redacted] <[Redacted]@gov.scot>, Cowan C (Caroline) <Caroline.Cowan@gov.scot>, [Redacted] <[Redacted]@gov.scot>, [Redacted] <[Redacted]@gov.scot>
MacKinnon D (Donna) <Donna.MacKinnon@gov.scot>, [Redacted] <[Redacted]@gov.scot>, Voas S (Sheila) <Sheila.Voas@gov.scot>, Wallace I (Iain) <Iain.Wallace@gov.scot>
Cc: [Redacted] <[Redacted]@gov.scot>
Subject: RE: Notification of seal incident at Scottish Sea Farms, Orkney

Hi folks,

[Redacted] has just informed me that the seal is still trapped inside the pen and that SSF will, on the advice of an independent vet, now proceed to euthanise it in order to alleviate its suffering. As [Redacted] says, this is legal if the required approval is obtained from the vet. SSF will use a suitably qualified marksman to dispatch the seal.

Our policy is that all reasonable steps should be taken to recover the carcass to enable subsequent inspection and that SMASS should be informed of any requirement to dispatch a seal. SSF are looking into options for retaining the carcass but given the time of year and the likely lack of any staff at SMASS to carry out a carcass inspection in the next few days they are currently of the view that carcass retention is unlikely. I will remind [Redacted] of the need to inform SMASS so that she is covering all bases.

[Redacted] will send in an email to a core group from among recipients of this email so that she has complied with her duty to notify SG.

[Redacted] - don't know if you're looking at emails today but, if you are, is there anything we need to do beyond logging the information?

Wrt possible media interest, no indication of that but I will double-check with [Redacted]

The Scottish Government claimed that “the dispatch has been carried out for humane reasons in line with the regs and that “all due procedures appear to have been followed”:

Doc. No. 11 / A36035253

Quick update:

This is not in the public domain beyond the farm so no media interest as yet. [Redacted] is drawing up some succinct factual lines confirming that the dispatch has been carried out for humane reasons in line with the regs.

[Redacted]

Caro - I suggest you pass this on as a live issue to tomorrow's senior on-call officer in case there is public reporting of the incident. I would not be inclined to alert Ministers at this stage given that all due procedures appear to have been followed.

“There is a provision for alleviating suffering of a seal,” wrote a Scottish Government official (name redacted) in December 2021. “There is quite a high bar to satisfy”:

From: [Redacted] @gov.scot>
Date: Friday, 24 Dec 2021, 10:08 am
To: Cowan C (Caroline) <Caroline.Cowan@gov.scot>, Palmer MR (Mike) <Mike.Palmer@gov.scot>, [Redacted] @gov.scot>, [Redacted] @gov.scot>
[Redacted] @gov.scot>, [Redacted] @gov.scot>
MacKinnon D (Donna) <Donna.MacKinnon@gov.scot>, [Redacted] @gov.scot>, Voas S (Sheila) <Sheila.Voas@gov.scot>
Cc: [Redacted] @gov.scot>
Subject: RE: Notification of seal incident at Scottish Sea Farms, Orkney

Hi Caro

There is a provision for alleviating suffering of a seal. There is quite a high bar to satisfy.

There is a topic sheet on this albeit it probably needs updating. But the substance around the provision will be correct.

An email in March 2021 from the Scottish Government referred to a provision for public health and safety but “there are likely to be very limited circumstances that this provision will apply”. “It is considered *unlikely* that a fish farm could effectively make an argument that seals are posing a threat to public safety although this cannot be discounted”:

From: [Redacted] @gov.scot>
Sent: 19 March 2021 13:35
To: [Redacted] @gov.scot> [Redacted]
Cc: [Redacted] @gov.scot>; [Redacted] @gov.scot>
Subject: seal trapped in fish farm cage

[Redacted]
Hi

This is the updated guidance. You'll see that there is a provision for public health and safety, but this is considered on a case by case basis and would need to be discussed with LOT. [Redacted] are the best contacts. I've had a quick chat with [REDACTED] to make her aware of the situation.

<https://www.gov.scot/publications/seal-licensing-form-and-guidance/>

This is the relevant section of policy guidance to which LOT would refer.

Public Health or Public Safety

This is an existing provision so applicants may seek to apply, although there are likely to be very limited circumstances that this provision will apply. Depending on the underlying circumstances, examples *may* include seals obstructing a road or railway; aggressive seals in accessible or busy areas; or to control transmission of disease from seals to humans. Not all situations will require a seal to be killed but some may require a seal to be taken. Advice should be sought from marine mammal advisers in Marine Scotland Science (MSS) and Sea Mammal Research Unit where appropriate in the event that a licence is sought under these grounds. It is considered *unlikely* that a fish farm could effectively make an argument that seals are posing a threat to public safety although this cannot be discounted. Analysis would need to be undertaken on a case by case basis, and a process will be put in place should the event arise. In the event of a query from a prospective applicant, the following lines to take may be used:

- Marine Scotland recognises there may be some instances where the public are at risk of harm from seals, although these are likely to be rare and case specific.
- Marine Scotland does not specify all situations where a seal is likely to be a public health and safety issue, however this may include an individual seal on land causing direct threat to a member to members of the public, through either its behaviour or its location. Such a seal may be acting in an aggressive manner, causing a dangerous obstruction, carrying a zoonotic disease or capable of carrying a zoonotic disease, or causing a health and safety risk in some other way.
- Please note, Marine Scotland are unlikely to consider a public health and safety issue in circumstances where there are no humans near the individual seal or humans are capable of avoiding the danger posed by the seal, for example an aggressive seal in a remote location or in the sea, or where humans would be purposefully interacting with the seal, for example by swimming or diving in the sea.

As discussed the provision for humane dispatch is unlikely to be appropriate unless the animal is seriously injured.

Caroline Cowan of the Scottish Government questioned the legality of seal killing in December 2021 when she asked: “I thought we couldn’t shoot seals anymore, or is this because it’s a welfare issue so we can?”:

From: Cowan C (Caroline) <Caroline.Cowan@gov.scot>
Date: Friday, 24 Dec 2021, 9:40 am
To: Palmer MR (Mike) <Mike.Palmer@gov.scot>, [Redacted]
 [Redacted] <@gov.scot>, [Redacted] <@gov.scot>, [Redacted]
 [Redacted] <@gov.scot>, [Redacted] <@gov.scot>,
 MacKinnon D (Donna) <Donna.MacKinnon@gov.scot>, [Redacted]
 [Redacted] <@gov.scot>, Voas S (Sheila) <Sheila.Voas@gov.scot>
Cc: [Redacted] <@gov.scot>
Subject: RE: Notification of seal incident at Scottish Sea Farms, Orkney

Thanks [Redacted]

I thought we couldn’t shoot seals anymore, or is this because it’s a welfare issue so we can?

I’m not quite sure what I might need to do, I guess there could be some media activity? Are ministers aware of this? Comms?

C

Dr Caro Cowan
 Interim Deputy Director Funding and Strategy

 Scottish Government
 [Redacted]

fish were all removed from the pen prior to the net being dropped to allow the seal to exit so when the net was dropped there were no fish in the pen to escape.

Trust this information is sufficient to close this enquiry.

Best regards,

[Redacted]

Grieg Seafood Shetland Ltd.
[Redacted]



ROOTED IN NATURE

Grieg Seafood explained in an email to the Scottish Government in March 2021 that it dropped the net and allowed the seal “to swim free unharmed”:

From: [Redacted] <[@griegseafood.com](mailto: Grieg Seafood Shetland Ltd. @griegseafood.com)>
Sent: 22 March 2021 10:06
To: Marine Conservation <Marine_Conservation@gov.scot>; MS FishHealth <MS.FishHealth@gov.scot>
Subject: RE: Removal of seal in salmon farm pen

Dear sir/madam,

I am writing to confirm that we managed to removed the seal from the pen on Saturday night by loading the salmon onto a wellboat and dropping the net and allowing the seal to swim free unharmed. The operation was successful and no salmon escaped at any point during the process.

Grieg emailed earlier in March 2021:

From: [Redacted]
Sent: 19 March 2021 15:33
To: Marine_Conservation@gov.scot
Cc: MS.FishHealth@gov.scot
Subject: FW: Removal of seal in salmon farm pen

Dear sir/madam,

At the advice of Marine Scotland Fish Health Inspectorate, I'm emailing you to let you know that during a net change on pen 5 at East of Papa Little (Lat 60.34473, Long -1.38143) we had an adult male grey seal gain access to our net yesterday (it swam into the new net which was put on around the old net, when the old net was removed it ended up inside the salmon net pen). The unit contains 56,000 salmon at 1.1kg weight. We have had seals enter net pens in the past and they have always left the same way they came in. In this case however the seal has not been able to get out in the same manner by which he has entered. We have dropped the

headline of our net as low as we dare, without risking losing salmon. Normally we would then expect the seal to slip over the top of the net and return to the sea but in this case the seal has not managed to do this. We have tried using a sweep net with grading panel (lets the salmon swim through the net but not the seal) to catch him but the seal has repeatedly burrowed under the net and this has proven unsuccessful. As a last resort we plan to bring in a wellboat tomorrow to pump the salmon out of the net which will then allow us to drop the net completely to free the seal. I'm hopeful this operation, while exceedingly expensive will be successful, however in the event that it is not I would be grateful if you have any advice as to how we should handle the matter. The seal is obviously very anxious but currently in good health. Our salmon are equally unsurprisingly extremely stressed by sharing their environment with their natural predator. So far over the two days the seal has killed an estimated 100 fish. I look forward to your advice at your earliest convenience. I'm sure you will understand that we are anxious for the sake of both the seal and our salmon to find a speedy solution to this problem.

An email from the Scottish Government to the Cabinet Secretary for Rural Affairs and Islands (Mairi Gougeon) in June 2021 stated – in response to a media inquiry from The Ferret ([who wrote a news story on the illegal killing of a seal by Scottish Sea Farms in Loch Spelve](#)) - that “those found guilty of breaking the new laws could face a maximum penalty of five years’ imprisonment, an unlimited fine, or both”:

From: [Redacted] <[Redacted]@gov.scot>
Sent: 03 June 2021 10:33
To: Cabinet Secretary for Rural Affairs and Islands <CabSecRAI@gov.scot>
Cc: [Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>;
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
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[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; Palmer MR (Mike) <Mike.Palmer@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; [Redacted]
[Redacted] <[Redacted]@gov.scot>; [Redacted] <[Redacted]@gov.scot>; Dobson L (Leanne)
<Leanne.Dobson@gov.scot>; Ingebrigtsen R (Ross) <Ross.Ingebrigtsen@gov.scot>; Nicolson S
(Stuart) (Special Adviser) <Stuart.Nicolson@gov.scot>
Subject: For Clearance: The Ferret - Seal killing

Good morning,

We received a query regarding an alleged seal killing at a salmon farm.

Comms, policy and SpAds are content with the response below and I would be grateful for clearance.

Proposed Response

A spokesperson for the Scottish Government said:

“Following changes to the Marine (Scotland) Act coming into force this year, Scottish Ministers can no longer grant licences authorising the killing or taking of seals for the purpose of protecting the health and welfare of farmed fish and for preventing serious damage to fisheries and fish farms.

“This is therefore a matter for Police Scotland to investigate.

“Those found guilty of breaking the new laws could face a maximum penalty of five years’ imprisonment, an unlimited fine, or both.”

Another email from the Scottish Government in May 2021 detailed the illegal nature of killing seals following changes to the law in February 2021 (which brought the killing of seals “in line with the most serious wildlife offences):

From: [Redacted] @gov.scot>
Sent: 25 May 2021 17:00
To: [Redacted] @gov.scot>; MS Communications <MS.Communications@gov.scot>;
Communications Rural Economy & Environment
<CommunicationsRuralEconomy&Environment@gov.scot>; [Redacted] @gov.scot>
Cc: Palmer MR (Mike) <Mike.Palmer@gov.scot>; [Redacted]
[Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted]
[Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted]
[Redacted] @gov.scot>; [Redacted] @gov.scot>; [Redacted]
[Redacted] @gov.scot>; Director of Marine Scotland Mailbox
<Directormarinescotland@gov.scot>
Subject: RE: Illegal killing of a seal in Loch Spelve by Scottish Sea Farms on 17 March 2021

Hi [Redacted] thanks for this and copying in [Redacted] from News on this directly as he had a number of queries on Loch Spelve over the last week from the Herald and colleagues on aquaculture/FHI side who have been involved in those queries for awareness.

Could we condense if necessary to the below?

A SG spokesperson said: "Following changes to the Marine (Scotland) Act coming into force this year, Scottish Ministers can no longer grant licences authorising the killing or taking of seals for the purpose of protecting the health and welfare of farmed fish and for preventing serious damage to fisheries and fish farms. The changes to legislation provide enhanced protection for Scottish seals and also increases the penalties associated with the killing, injuring or taking of a live seal, bringing it into line with the most serious wildlife offences. Any potential offences should be reported to Police Scotland.

"We recognise that the sector has a duty to protect farmed fish from potential stress and injury caused by seal attacks which is we are progressing guidance for aquaculture businesses on seal predation, and have also commissioned research into non-lethal ways of managing seals around fish farms."

Background:

- The changes to the seal licensing system that came into force in February 2021 as part of the Marine (Scotland) Act 2010 improve the conservation and welfare of seals, and help protect an important export market for farmed salmon.
- These changes were also made to ensure compliance with the US Marine Mammal Protection Act which require that export nations prohibit the intentional mortality and serious injury of marine mammals in commercial fisheries.
- The Act also increased the penalties associated with the offence of killing, injuring or taking a live seal to bring them in line with the most serious wildlife offences. Those found guilty of breaking the new laws could face a maximum penalty of five years' imprisonment, an unlimited fine, or both.

Download the Scottish Government's FOI disclosure in full as a PDF online via [FOI disclosure 202200333363 - Documents in Scope - Redacted 19 May 2023](#)

Scottish Salmon Watch [reported in March 2021](#):

Norwegian giant Scottish Sea Farms was responsible for the vast majority of the information disclosed but the company - who refer to the killing of seals as an 'execution' - does not appear to have a culture of taking photos.

From: (REDACTED) <@scottishseafarms.com>
Date: Sun, 10 May 2020 at 14:50
Subject: Seal Cull
To: (REDACTED) <@sruc.ac.uk>

I would like to report a seal cull (Site Co-ordinates - 57.3854 N 5.6142 W) on 08/05/2020. No photos have been taken during this execution.

(redacted)  **Scottish
Sea Farms**

The Scottish Marine Animal Strandings Scheme wrote in April 2020 (as [reported by Scottish Salmon Watch in March 2021](#)):

On Mon, 27 Apr 2020 at 10:27, (redacted) <@sac.co.uk> wrote:

We have had 14 reports the majority from Scottish Sea Farms Ltd. None were recovered and sent to us for necropsy none were sampled. Five animals, all grey seals were confirmed with photos, the remainder 9 were not. Details of all the cases are below.

10. Reported as harbour seal shot at Shuna, Loch Linnhe 09/01/20 grid ref NM 925497 no photos to confirm the species carcass sunk. Scottish Sea Farms Ltd.

11. Reported as grey seal shot at Swarta Skerry, Vidlin, Shetland 04/04/20 grid ref HU485676 no photos to confirm the species carcass sunk. Scottish Sea Farms Ltd.

12. Reported as harbour seal shot at Shuna, Loch Linnhe 03/04/20 grid ref NM 925497 no photos to confirm the species carcass sunk. Scottish Sea Farms Ltd.

13. Reported as grey seal shot at Wyne, Orkney 16/04/20 grid ref HY456253 no photos to confirm the species carcass sunk. Scottish Sea Farms Ltd.

14. Reported as grey seal shot at Swarta Skerry, Vidlin, Shetland 21/04/20 grid ref HU485676 no photos to confirm the species carcass sunk. Scottish Sea Farms Ltd.

Most of reports we receive are like this "I am writing to report the sinking of a seal carcass at Vidlin (Grid Reference - HU485676) on 21.04.2020. 1 Grey seal was culled using a single shot to the head by a licenced marksman – this has been reported to Marine Scotland and RSPCA. Unfortunately there are not photos available."

I always ask for a photo of the animal when we get a report, though as you can see they aren't particularly good at providing them.

Scottish Salmon Watch [reported in March 2021](#):

In May 2020 the Scottish Marine Animal Strandings Scheme wrote that salmon farmers "have no willingness, intention or, to be fair in some cases, capacity to collect any more detailed information". "In some cases we get photos of damaged stock or seals in the water but nothing at a resolution which can assess if these culls are being undertaken in adherence with regulations".

From: (REDACTED) <@sruc.ac.uk>

Sent: 10 May 2020 16:25

To: (REDACTED) <@gov.scot>

Subject: Fwd: Seal Cull

Hi (REDACTED)

And another one. I appreciate these reports are perhaps better collated and sent periodically as you suggested, but this report highlights the recurrent theme. Given the proforma nature of these reports, we asked if it may be possible to get more information from these cases. Short answer was no; they have no willingness, intention or, to fair in some cases, capacity, to collect any more detailed information. In some cases we get photos of damaged stock or, as you say, seals in the water, but nothing at a resolution which can assess if these culls are being undertaken in adherence with regulations.

All the best

(REDACTED)

(REDACTED)

Scottish Marine Animal Stranding Scheme

SRUC Northern Faculty

An Lòchran, Inverness Campus, IV2 5NA

(REDACTED)

Scottish Sea Farms were specifically asked to provide photographs:

From: (Redacted) <@sac.co.uk>
Sent: Monday, 4 May 2020 10:33 am
To: (Redacted) <@scottishseafarms.com>; (Redacted) <@sruc.ac.uk>
Subject: RE: Seal Carcass

Thank you for this report, as well as the report of the seal that was shot at Vidlin on the 30th April 2020.

The same grid reference is listed for both reports (HU485 676) which is at Vidlin. Would you be able to provide us with a new grid reference for this seal at Swarta Skerry when you get a moment please?

I do appreciate the at sea conditions make it difficult especially when carcasses sink, but if every attempt could be made to get some photographs of the shot seals so we can at least confirm the species next time that would be greatly appreciated.

Scottish Sea Farms claimed to "have encouraged all site managers to take photos prior to a cull":

From: (Redacted) <@scottishseafarms.com>
Sent: 04 May 2020 11:09
To: (Redacted) <@sac.co.uk>; (Redacted) <@sruc.ac.uk>
Subject: RE: Seal Carcass

Hiya,

My mistake the grid reference for Swarta Skerry is - HU473623.

I have encouraged all site managers to take photos prior to a cull and will continue to do so.

Kind Regards,
(Redacted)

Freya in the Orkney office of Scottish Sea Farms claimed that "the seal sunk before they had a chance to recover it and take photos" and SSF in South Shian claimed that "the site has very rarely seen the culprit of the damage so no photos have managed to be taken":

From: (redacted) @scottishseafarms.com>
Sent: 06 April 2020 11:46
To: (redacted) @sruc.ac.uk>
Subject: Re: Seal Carcass

Hi there,

Unfortunately not, the seal sunk before they had a chance to recover it and take photos.

Kind regards,
Freya

(redacted) | (redacted)
Scottish Sea Farms Ltd
Scapa Regional Office, Kirkwall, KW15 1SD, Orkney
Tel: (redacted)

From: (redacted) @scottishseafarms.com>
Sent: 06 April 2020 13:03
To: (redacted) @sruc.ac.uk>
Subject: RE: Seal Carcass

Good Afternoon

I am sorry the site has very rarely seen the culprit of the damage so no photos have managed to be taken.

Best Regards

(redacted)
[Scottish Sea Farms Limited](#)

The culling of seals at Scottish Sea Farms is sanctioned by RSPCA Assured (read the RSPCA's policy on condoning the killing of seals by salmon farms [online here](#)):

From: (redacted) <@scottishseafarms.com>
Sent: 30 March 2020 10:15
To: (redacted) <@sruc.ac.uk>
Cc: (redacted) <@scottishseafarms.com>
Subject: Seal Carcass

I would like to report the weighting and sinking of a seal carcass at Shuna (Grid Reference - NM925497) on 28/03/2020.

1 Harbour seal was culled using a single shot to the head by a licenced marksman – this has been reported to Marine Scotland and RSPCA.

If you have any questions please don't hesitate to ask.

Kind Regards,

(redacted) | (redacted)
[Scottish Sea Farms Limited](#)
Scapa Regional Office, Kirkwall, Orkney, KW15 1SD
Tel (redacted)



Scottish Salmon Watch [reported in February 2021](#) how Scottish Sea Farms was the #1 seal killer in Scotland:

Data Analysis - Lethal Scottish Salmon: the Norwegian-owned companies killing seals in Scotland! (1,000+ seals slaughtered between 2011 and 2020)



Summary:

Over 1,000 seals have been killed by salmon farms since 2011 according to official statistics [published online by the Scottish Government](#). Norwegian-owned company Scottish Sea Farms leads the slaughter with 235 seals killed followed by Norwegian giant Mowi (known as Marine Harvest until 2019) with 185 seals killed and The Scottish Salmon Company (the Norwegian Government is the largest shareholder) with 182 seals killed.

SEALS KILLED BY SALMON FARMS (2011 to 2020*) - as officially reported to the Scottish Government										
	Scottish Sea Farms	Mowi/Marine Harvest	The Scottish Salmon Co	Hjalte/Grig	Loch Duart	Cooke	Wester Ross	Kames	Others	TOTAL
2011	37	34	54	50	10		1	2	47	235
2012	45	10	30	50	20		1	2	33	206
2013	33	5	14	32	13		3	1	14	115
2014	31	7	14	7	13		4		10	88
2015	15	20	11		9	3	2	2	8	70
2016	14	26	2		12	8	2		1	65
2017	12	13	7	1	15	1				49
2018	11	24	6		2	9	2			54
2019	13	25	18		7	2				65
2020	22	15	17		5	1	2	1		63
TOTAL	235	185	182	140	106	20	17	8	113	1010

* Q4 2020 data missing

Download Excel spreadsheet summarizing the data [online here](#)

The Ferret [reported in September 2015](#):



Scottish Sea Farms, which supplies Lochmuir-branded salmon to Marks & Spencer, has shot the most seals since 2013



theferret.scot
 Mapped: every Scottish salmon farm that shot seals
 The naming of 75 salmon farms that have shot 180 seals around Scotland over the last two years has prompted calls for a consumer boycott

10:35 AM · Sep 2, 2015



It is painfully clear that trigger-happy Scottish Sea Farms has been killing seals illegally for years and has not been following either the letter of the law or the RSPCA's 'last resort' killing:

Here's the latest RSPCA salmon standards [published in February 2021](#) (which themselves contradict the law):

Protection from other animals

NEW



From 1st March 2021, the killing of seals by the salmon industry in Scotland will be prohibited by law.

The Scottish Parliament has also commissioned a review into the use of acoustic deterrent devices (ADD/ASDs) to be concluded by March 1st 2021. This review will inform any decision that the government may make in terms of future plans for legislation regulating the use of these devices. If new legislation comes into force regarding the use of acoustic deterrent devices, the standards may be amended accordingly.

NEW



The shooting of seals is against the principles of the RSPCA welfare standards.

However, at the present time, it is acknowledged that as a last resort only, i.e. when all available non-lethal deterrents have been effectively deployed and the welfare of the fish is being compromised (i.e. they are being attacked), it may be necessary to use a lethal measure to safeguard the welfare of the fish.

The RSPCA continues to examine new non-lethal methods of controlling predators around salmon farms and is aiming to reach a position whereby the shooting of seals is never necessary.

HP 7.0 **NEW** The shooting of seals is not permitted, other than in exceptional circumstances (see i box below) and when all required non-lethal deterrents have been effectively deployed (see relevant Standards below), i.e. as a last resort.

NEW



An 'exceptional circumstance' is defined as an unexpected/unforeseen event, such as the unavoidable failure of nets, ADDs/ASDs (Acoustic Deterrent Devices/Acoustic Startle Devices), systems or other equipment used to protect the fish from seals due to extreme weather or human error, and where a seal is found to be in the act of attacking the salmon.

HP 7.1 **NEW** Humane precautions must be taken to protect salmon from other animals that could cause them harm, including bringing in disease

HP 7.2 **NEW** The producer must fully detail the methods used to protect the fish from other animals in the Predator Control Plan.

HP 7.3 **NEW** The primary means of protecting the fish must be through physical exclusion, by denying other animals access to tanks and enclosures.

HP 7.4 **NEW** Enclosure nets must be fully tensioned and weighted to prevent distortion, taking into account local conditions such as currents, tides flows etc.

HP 7.5 **NEW** Enclosure nets, including predator top nets, must be checked:
a) at least weekly, for holes and fouling, and maintained in good order
b) daily, for any trapped wild animals, which must be removed without delay from the time that they are first observed.

- HP 7.14** **NEW** The producer must be able to demonstrate that all of the procedures leading up to the point of last resort have been mobilised.
- HP 7.15** **NEW** Prior to being shot, the individual seal responsible for attacking the fish on the site must be positively identified.
- HP 7.16** **NEW** All attempts must be made to recover the body of the animal that has been shot, and it must be recorded whether the body was recovered or not.
- HP 7.17** **NEW** Any dead wildlife carcasses must be disposed of in accordance with legal requirements.
- HP 7.18** **NEW** Where it becomes necessary to humanely dispatch a seal as a last resort, the following records must be kept:
- a) Names of all persons with valid firearms certificates who are deemed competent to perform the task
 - b) Details of any bullets used and returned to the ammunition register, if shot by an employee
 - c) Details of any animal that has been shot, including:
 - i) The species
 - ii) The time and date of dispatch
 - iii) The location
 - iv) The reason for the shooting
 - v) The number of fish killed before resorting to the lethal method
 - vi) The number of fish on site
 - d) If an external marksman is used, an employee must be there to record when a shooting takes place.
- HP 7.19** **NEW** For members of a farm assurance scheme, all required details relating to seal shootings must be provided to the scheme in the required format (see Appendix 4) within 72 hours of a shooting having taken place; details must include information relating to HP 7.16.
- NEW**

i The assurance scheme should review the information relating to HP 7.19 and visit the site to establish further details and inform decisions around compliance.
- HP 7.20** **NEW** After every shooting incident, a review of all predator exclusion procedures must be undertaken and records kept of such reviews.

Here's a [copy of RSPCA Assured's seal culling form](#):

Appendix 4

RSPCA Assured Salmon Farms – 72 Hour Reporting Form – Seal Cull

Please fill out this form in full and email to asales@rspcaassured.co.uk and malcolm.johnstone@rspcaassured.co.uk within 72 hours of the incident.

Membership number	
Site name	
Date & time of shooting	
Farm SG licence number	
Number of seals shot and species (e.g. grey or common seal)	
Number and locations of pens affected	
Total number of pens and fish on site at time of predation	
Number of fish killed before last resort shooting took place, and over what time period?	
Location of shooting	
Reasons for shooting (explain why this was considered a last resort)	
How was it ascertained that the damage to the fish was seal-related?	
How did the site manager decide that a seal damage threshold had been reached?	
Details regarding nets (incl. Predator nets)	
Details regarding ADDs (model, transducer positioning on site etc.)	
Any other relevant comments	
Remedial action to prevent further seal attacks	

Signed forby:..... Date: dd/mm/yy

In conclusion, \$camon \$cotland urge the authorities to take immediate action against Scottish Sea Farms (Norskott Havbruk) including a prosecution and heavy fine for breaking the law in relation to the killing of seals at Wyre salmon farm in Orkney (in both October 2022 and December 2021).

In view of the illegal killing of seals it beggars belief that Marks & Spencer continues to source exclusively from Scottish Sea Farms and brand the product as “responsibly sourced”. Moreover,

it is a royal scandal and a national disgrace that the RSPCA and RSPCA Assured continue to condone the illegal killing of seals by salmon farms.

Further information can be found via: [Damning Post Mortem Report Exposes Illegal Killing of Seal by M&S supplier](#)

Yours sincerely,

Don Staniford

Director, \$camon \$cotland

Cc:

Scottish Marine Animal Stranding Scheme: reports@strandings.org

Sheila Voas, Chief Veterinary Officer, Scottish Government: sheila.voas@gov.scot

Mike Palmer, Scottish Government: mike.palmer@gov.scot

Caroline Cowan, Scottish Government: caroline.cowan@gov.scot

Malcolm Pentland, Scottish Government: Malcolm.pentland@gov.scot

Andy Turner, Wildlife Crime Project Officer, Nature Scotland: andy.turner@nature.scot

Ross Flett, Orkney Seal Rescue: SelkieSave@aol.com

Chris Sherwood, Chairman, RSPCA: executive@rspca.org.uk

Chris Packham, President, RSPCA: executive@rspca.org.uk

Emma Slawinski, Director of policy, prevention and campaigns, RSPCA: emma.slawinski@rspca.org.uk

David Thomas, Vice Chair, RSPCA: info@advocates-for-animals.com

Kirsteen Campbell, Chief Executive, SSPCA: kcampbell@scottishspca.org

Philip Lymbery, Chief Executive, CIWF: philip@ciwf.org

Bob Elliot, CEO, OneKind: bob.elliott@onekind.org