

**From:** Don Staniford [mailto:salmonfarmingkills@gmail.com]  
**Sent:** 02 October 2015 22:13  
**To:** 'Nina Young - NOAA Federal'  
**Cc:** 'rod.mcinnis@noaa.gov'; 'kathryn.sullivan@noaa.gov'; 'JFRobins'  
**Subject:** RE: Complaint re. killing of seals & sea lions and MMPA

Nina,

Further to your email of 1 September, please note that the Global Alliance Against Industrial Aquaculture has formally submitted comments on the proposed regulatory action: "[Fish and Fish Product Import Provisions of the Marine Mammal Protection Act](#)" (submitted online as directed via <http://www.regulations.gov/#!submitComment;D=NOAA-NMFS-2010-0098-0035>).



**FEDERAL REGISTER**  
The Daily Journal of the United States Government



Proposed Rule

## Fish and Fish Product Import Provisions of the Marine Mammal Protection Act

A Proposed Rule by the [National Oceanic and Atmospheric Administration](#) on 08/11/2015



You have successfully submitted an official comment to Regulations.gov.

regulations.gov

Thank you! Your comment has been submitted to [Regulations.gov](#) for review by the the National Oceanic and Atmospheric Administration.

Comment Tracking Number: [1jz-81gk-j183](#)

I also copy your colleague Rod McInnis into this email. Rod received a submission earlier today from John Robins of Save Our Seals Fund (copied in here also) - including the following:

"In Scotland the killing of seals at marine salmon farms is not caused by unintentional entanglement but by deliberate shooting sanctioned under license by the Scottish Government. Very few (13% according to the most recent available statistics) salmon farms in Scotland use seal exclusion nets to keep predators away from their stock and opt instead to shoot seals. This avoids considerable financial investment in the purchase, installation and maintenance of the predator exclusion nets and gives Scottish salmon farms a distinct commercially competitive advantage over producers in countries which insist that salmon farmers use predator exclusion nets to avoid killing marine mammals.

I urge the United States Government to use the new Proposed Rule to Protect Marine Mammals in International Fisheries under the Marine Mammal Protection Act to compel all marine salmon farmers exporting to the USA to utilize predator exclusion nets to avoid

killing marine mammals. By doing so you will help protect the globally important populations of both gray and harbour seals in Scottish waters and you will protect the interests of the more environmentally sensitive salmon farming industry within the United States."

GAAIA endorses this submission and points you to a recent article in the Shetland News: <http://www.shetnews.co.uk/news/11321-shetland-fish-farms-top-seal-shooting-list>

In particular, please note the following:

"Last year Grieg Seafood Hjalmland, which employs over 200 people and produces over 60 per cent of Shetland salmon, started investing around £2 million to stop grey seals breaching its anti-predator nets. The company has installed 26 extra-strong 'Econets' around the cages at its three Wadbister sites, including Laxfirth, at a cost of more than £40,000 each."

Therefore, a single salmon farm in Shetland spent over £1 million on predator nets at a 26-cage farm. If you assume (based upon a [Scottish Government survey in 2011/2012](#)) that 87% of the industry do NOT use predator nets and there are 143 active salmon farms (based on the [latest Scottish Government annual fish farm survey](#)) then it would cost well over £100 million for the entire Scottish salmon farming industry to install predator nets.

In essence, in excess of £100 million is the price for Scottish seal-friendly farmed salmon. In other words, the Scottish salmon farming industry has a £100 million + competitive advantage over the US salmon farming industry which I understand is prohibited from killing marine mammals under the US MMPA.

Please also note a 1996 paper - "Seal predation at salmon farms in Maine, an overview of the problem and potential solutions" - published in the Marine Technology Society Journal: <http://paper.thesislog.net/?seq=261474>

The paper includes:

"Industry proponents claim up to 10% of the industry's farm-gate value is lost to seal predation"

This paper suggests that salmon farmers in Scotland (who routinely kill seals and hence avoid losses due to seal predation) could have a competitive advantage of up to 10%.

In Canada, some salmon farming companies (but not all) have also taken expensive steps to install predator nets. For example, following a spate of sea lions deaths in British Columbia in 2011, Marine Harvest Canada announced "plans to ensure that lethal interactions with seals and sea lions at its salmon farms are drastically reduced, if not eliminated". According to Marine Harvest Canada's [press release](#) (17 October 2011): "The nets, referred to as winter predator guards, encompass the entire farm and provide a first wall of defense against marine predators. They are constructed of high density polyethylene and include a stainless steel core and will cost \$250,000 to outfit each farm site."

Again, certain sections of the BC salmon farming industry has shown that it can simply (albeit expensively) install predator nets to eliminate the killing of seals and sea lions. You can view the latest quarterly data published by DFO online via [http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/mar\\_mamm-eng.html](http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/mar_mamm-eng.html)

The Q1 2015 data, for example, shows one harbour seal killed by Cermaq at their Saranac Island salmon farm in the Clayoquot Sound UNESCO Biosphere Reserve: [http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/docs/mar\\_mamm/control-lutte/2015-Q1-T1-eng.html](http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/docs/mar_mamm/control-lutte/2015-Q1-T1-eng.html)

 <b>AQUACULTURE MANAGEMENT</b> Ensuring Sustainable Fisheries						
<b>Authorized Marine Mammal Control Activities</b> January - March, 2015						
Facility Reference Number	Licence Holder	Site Common Name	DFO Pacific Fishery Management Area	Marine Mammal Species		
				Harbour Seal	California Sea Lion	*Other
244	Creative	Eagle Bay	Clayoquot	0	0	0
776	Creative	Baxter Islets	Clayoquot	0	0	0
1419	Creative	Dawley Pass	Clayoquot	0	0	0
1596	Creative	Warne Island	Clayoquot	0	0	0
1537	Cermaq	Bare Bluff	Clayoquot	0	0	0
169	Cermaq	Barkley	Port Alberni	0	0	0
520	Cermaq	Bedwell	Clayoquot	0	0	0
1144	Cermaq	Burdwood	Broughton	0	0	0
819	Cermaq	Cecil Island	Broughton	0	0	0
136	Cermaq	Cliff Bay	Broughton	0	0	0
540	Cermaq	Fortune Channel	Clayoquot	0	0	0
869	Cermaq	Maude Island	Broughton	0	0	0
1291	Cermaq	McIntyre Lake	Clayoquot	0	0	0
1507	Cermaq	Millar Channel	Clayoquot	0	0	0
543	Cermaq	Mussel Rock	Clayoquot	0	0	0
6668	Cermaq	Plover Point	Clayoquot	0	0	0
526	Cermaq	Rant Point	Clayoquot	0	0	0
304	Cermaq	Raza Island	Discovery	0	0	0
314	Cermaq	Ross Pass	Clayoquot	0	0	0
527	Cermaq	Saranac Island	Clayoquot	1	0	0

For more specific details please note GAAIA's letter to NOAA dated 30 August 2015 - read [online here](#).

I also attach a letter sent to the RSPCA/Freedom Food which certifies ca. 70% of Scottish salmon farms (even though it endorses the killing of seals) - the letter includes photos of seals killed near a Scottish salmon farm in Loch Alsh 'Special Area of Conservation'.

Finally, please note that 2015 data on seal-killing salmon farms will be made available by the Scottish Government by 20 October. GAAIA will happily pass this onto NOAA.

Thanks,

Don

Don Staniford

Director, Global Alliance Against Industrial Aquaculture (GAAIA):  
<http://www.salmonfarmingkills.com>

**From:** Nina Young - NOAA Federal [<mailto:nina.young@noaa.gov>]  
**Sent:** 01 September 2015 19:32  
**To:** Don Staniford  
**Subject:** Re: Complaint re. killing of seals & sea lions and MMPA

Dear Mr. Staniford,  
Attached please find the MMPA import rule you reference in your letter. I suggest that you review the rule and provide comments on the proposed regulatory action.  
Thank you for your interest.  
Nina Young

Dr. Kathryn Sullivan  
Under Secretary of Commerce for Oceans and Atmosphere  
**National Oceanic and Atmospheric Administration**  
**Department of Commerce**  
1401 Constitution Avenue, NW  
Room 5128  
Washington, DC 20230  
United States of America

Email: [kathryn.sullivan@noaa.gov](mailto:kathryn.sullivan@noaa.gov)

30th August 2015

**RE: Complaint re. killing of seals & sea lions and MMPA**

Further to the group complaint filed in October 2011 and further to GAAIA's letter of May 2013 (see enclosed in Appendix 2 and also [online here](#)) could you please take immediate action against the Scottish salmon farming industry in particular in relation to the killing of seals?

GAAIA also believes there is enough evidence assembled from salmon farming operations killing marine mammals around the world - in Chile, Canada, New Zealand and Australia for example - to open an immediate investigation into lethal practices of the global salmon farming industry.

Under the U.S. Marine Mammal Protection Act it [appears illegal](#) for consumers in the United States to buy salmon from farms where seals have been shot. Given that the U.S. is the biggest export market for Scottish farmed salmon this is no small issue but we feel that the time to act is now.

Data obtained on 21 August 2015 via Freedom of Information from the Scottish Government (sourced from quarterly return forms filed by salmon farming companies for 2013 and 2014) [reveals](#) that:

- over half (51%) of salmon farms in Scotland killed at least one seal and almost a quarter (23%) of salmon farms in Scotland killed at least two seals

- Shetland is the most lethal region representing almost half (49%) of seal killings following by Orkney (15%) and Argyll & Bute (14%)
- the most deadly salmon farm is Hjtaltland/Grieg's salmon farm at East Voe Laxfirth in Shetland followed by Scottish Seafarms' salmon farm at Veantrow Bay in Orkney
- the Norwegian-owned companies Scottish Seafarms (Leroy/Salmar) and Hjtaltland Seafarms (Grieg Seafood) are the most deadly companies
- Scottish Seafarms killed 56 seals during 2013 and 2014 - almost a third (32%) of all seals killed by salmon farms in Scotland
- other trigger-happy salmon farmers are the Scottish Salmon Company, Marine Harvest and Balta Island Seafare

Here's the top 10 seal-killing salmon farm sites (2013 to January 2015\*):

- #1: East Voe Laxfirth, Shetland (Hjtaltland/Grieg) - 24
- #2: Veantrow Bay, Shapinsay, Orkney (Scottish Seafarms): 13
- #3: West of Balta Island, Shetland (Balta Island Seafare): 7
- #4 =: South Voe of Gletness, Shetland (Hjtaltland/Grieg): 6
- #4=: Bellister, Shetland (Scottish Seafarms): 6
- #6 =: Gometra, Isle of Mull, Argyll & Bute (Scottish Salmon Company): 5\*
- #6 =: Loura Voe, Shetland (Scottish Seafarms): 5
- #6 =: Taranaish, Loch Roag, Isle of Lewis (Scottish Salmon Company): 5
- #6 =: West Voe, Shetland (Bound Skerries Seafood): 5
- #10 =: Grunna Voe, Shetland (Scottish Seafarms): 4
- #10 =: Ardchattan Bay, Loch Etive, Argyll & Bute (Dawnfresh): 4
- #10 =: Toyness, Scapa Flow, Orkney (Scottish Seafarms): 4

\* Some data for January 2015 was made available by the Scottish Government. GAAIA filed a FOI request on 24 August 2015 requesting all seal-killing data for 2015 (a reply is expected in late September 2015).

The data disclosure also reveals that the vast majority of dead seals go unreported and decaying corpses are rarely recovered or collected. In fact, out of 173 seals killed by salmon farms in 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](#).

A list of all the Scottish salmon farms killing seals in 2013 and 2014 is enclosed below in Appendix 1. For all the source data and copies of seal-killing returns forms please read:

["Appendix: Companies, Regions & Sites"](#)

["Appendix: Source Data - Seal Killing Return Forms Submitted by Salmon Farms"](#)

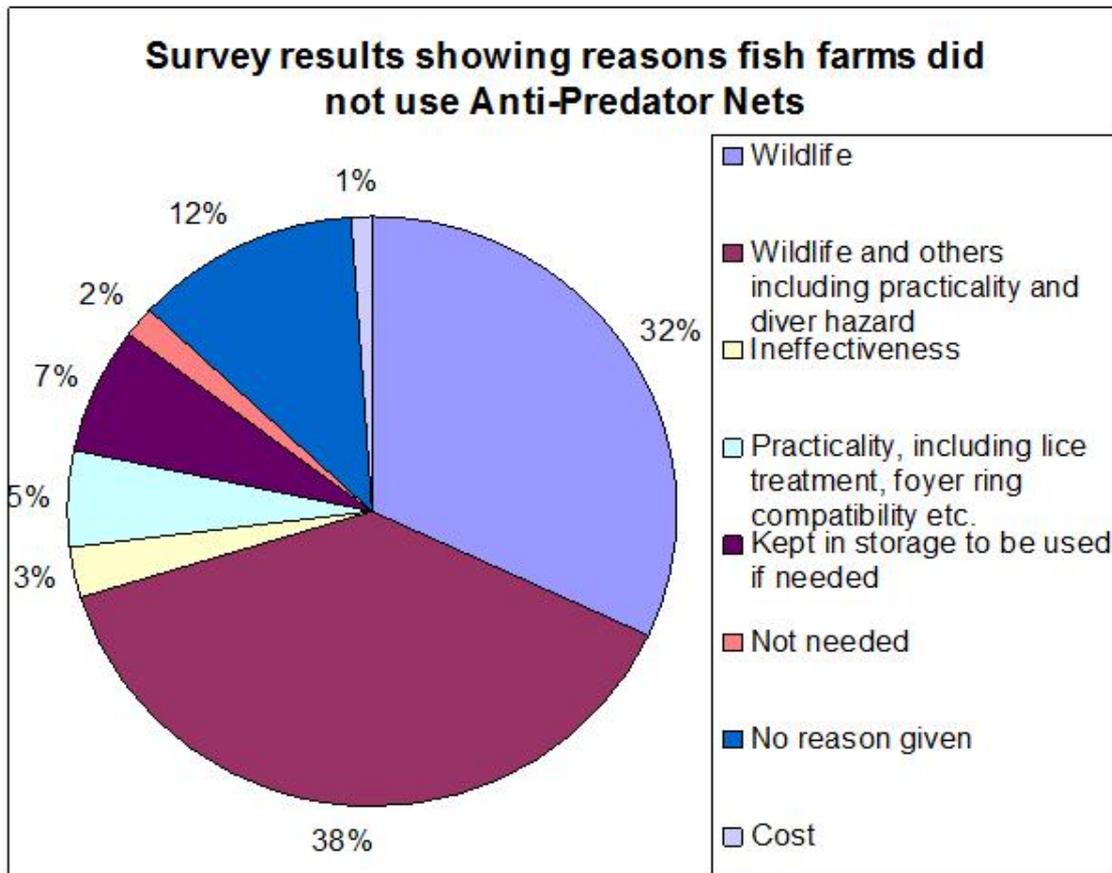
[250 PDFs in a 10 MB Zip file are available via Dropbox - please email [dstaniford@gaaia.org](mailto:dstaniford@gaaia.org)].

Please also note that a [Scottish Government survey in 2011/2012](#) revealed that 87% of salmon farms in Scotland do not even use predator nets - belying the salmon farming industry's claim that only shoot seals as a "last resort":

### **2011/12 Survey - Anti-Predator Nets**

A total of 13% of fish farms actively use anti-predator nets and a further 7% have anti-

predator nets in storage, making 20% in total (36 out of 175 responses). A number of reasons were offered for not using such nets but the most significant by far at 70% was related either solely or partly to possible impacts on wildlife. It should be noted that properly installed and maintained high-tension seal exclusion nets should not harm seals or other marine mammals. However this requires employing extra trained staff and regular net maintenance and cleaning which costs money and eats into profit margins.



Read more via ["Fish Farms in Shooting Seals Row"](#) and ["Scottish Salmon's Lethal Seal of Disapproval - 87% of farms fails to install predator exclusion nets"](#)

In 2014 there was also a [humpback whale killed by a salmon farm](#) off the Isle of Mull in Scotland. In 2013 another [humpback whale was found dead in a salmon farm](#) in Clayoquot Sound in British Columbia, Canada.

In addition to the killing of seals in Scotland, there are ongoing kills in Canada, Chile, New Zealand and Australia for example. In Australia, seals have been killed on salmon farms in Tasmania (read more via ["Tasmania's salmon trade casts deadly net"](#)). Environment Tasmania [report](#) that: "As of June 2013, at least 144 protected seals have died as a result of fish farming in just four years". The Tasmanian Times [reported](#) in July 2015: "the Tasmanian Government seal management strategy has resulted in normally protected seals being deliberately killed with Government approval".

In New Zealand, dolphins and seals have been recently been reported killed in salmon farms in the Marlborough Sounds (read more via ["Dolphins die on NZ King Salmon farms"](#)). In Chile, a photo of salmon farmers killing a sea lion attracted the [condemnation of both the Chilean Government and salmon farming industry](#) itself in July 2015. Sernapesca filed a

formal complaint for animal abuse following the identification of the salmon farming company responsible (read more via "[Sernapesca files formal complaint over salmon farm workers' animal abuse](#)"). In Canada, data on mortalities at salmon farms in British Columbia is routinely [published online](#).

Suffice to say that the Scottish situation is the tip of a very large iceberg which demands urgent investigation. GAAIA therefore asks that the US Department of Commerce opens up a file on seal killing by the salmon farming industry globally.

In 2012, NOAA stated in a letter to Save Our Seals Fund:

The MMPA prohibits the intentional killing of marine mammals in commercial fishing operations, which includes aquaculture farms. Specifically, section 101(a)(2) of the MMPA (16 U.S.C. 1371(a)(2)) states that "[t]he Secretary of the Treasury shall ban the importation of commercial fish or products from fish which have been caught with commercial fishing technology which results in the incidental kill or incidental serious injury of ocean mammals in excess of United States standards..." Section 102 (c)(3) states that it is unlawful to import into the United States "... any fish, whether fresh, frozen, or otherwise prepared, if such fish was caught in a manner which the Secretary has proscribed for persons subject to the jurisdiction of the United States, whether or not any marine mammals were in fact taken incident to the catching of the fish."

In 2010, NOAA's National Marine Fisheries Service published in the *Federal Register* an advance notice of proposed rulemaking (ANPR; <http://edocket.access.gpo.gov/2010/pdf/2010-10158.pdf>) announcing that we were developing a proposed rule to establish the standards that would determine which commercial fish products would be eligible for importation and deemed in compliance with these import provisions of the MMPA. This rulemaking would define the "United States standards" referred to in MMPA section 101(a)(2), along with any associated criteria by which the United States would assess foreign fisheries that supply fish and fish product imports to the United States. The rule also would describe procedures for ensuring the established standards and their associated criteria are met, as well as procedures for developing recommendations regarding import prohibitions if those standards and associated criteria are not met.

I understand that NOAA recently launched a comment period earlier this month on "[Fish and Fish Product Import Provisions of the Marine Mammal Protection Act](#)" with a deadline for submissions in November 2015. Could you please therefore take this letter (and previous correspondence in Appendix 2) as GAAIA's submission? Or is there a more appropriate legal or formal mechanism for taking this complaint forward?

In conclusion, I quote from the [complaint letter](#) filed in October 2011:

"Based on the continued killing of marine mammals, we therefore ask that imports of farmed salmon from those countries and companies sponsoring and sanctioning lethal controls be excluded from the U.S. market. We ask that the U.S. send a strong signal that the killing of marine mammals will no longer be tolerated."

Yours sincerely,

Don Staniford

Director of the [Global Alliance Against Industrial Aquaculture](#)

Contact details: [dstaniford@gaaia.org](mailto:dstaniford@gaaia.org)

### **Appendix 1: Scottish Salmon's Serial Seal Killers**

A total of 74 salmon farms killed at least one seal in the period 2013-2014 (75 if you include the Scottish Salmon Company's salmon farm at Gometra, Isle of Mull, for January 2015).

According to the latest [Scottish Government annual survey of fish farms](#) there were 145 active salmon farms in 2013. In other words, over half of salmon farms in Scotland killed at least one seal.

A total of 33 salmon farms killed at least two seals in the period 2013-2014 (34 if you include the Gometra site for January 2015). In other words, almost a quarter (23%) of salmon farms in Scotland killed at least two seals.

#### **#1: East Voe Laxfirth, Shetland (Hjaltland/Grieg) - 24**

Hjaltland Seafarms/Grieg Seafood - East Voe Laxfirth, Lax Firth, Shetland (FS0333): 1 grey seal killed (7 August 2014); zero carcass recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - East Voe Laxfirth, Lax Firth, Shetland (FS0333): 3 grey seals killed (2 May and 23 & 30 July 2014); zero carcasses recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - East Voe Laxfirth, Lax Firth, Shetland (FS0333): 8 grey seals killed (12 May; 2, 7, 15 & 26 June and 1, 6 & 14 July 2013); zero carcasses recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - East Voe Laxfirth, Lax Firth, Shetland (FS0333): 1 common seal killed (29 April 2013); zero carcass recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - East Voe Laxfirth, Lax Firth, Shetland (FS0333): 11 grey seals killed (4, 10, 12, 17, 18, 22, 24, 25 & 27 February and 1 & 18 March 2013); zero carcasses recovered, reported or collected

#### **#2: Veantrow Bay, Shapinsay, Orkney (Scottish Seafarms): 13**

Scottish Seafarms - Veantrow Bay, Shapinsay, Orkney (FS0860): 1 grey seal killed (23 January 2014); one carcass recovered (but not reported or collected)

Scottish Seafarms - Veantrow Bay, Shapinsay, Orkney (FS0860): 3 grey seals killed (2 & 5 December 2013); 3 carcasses recovered (but zero reported or collected)

Scottish Seafarms - Veantrow Bay, Shapinsay, Orkney (FS0860): 4 grey seals killed (27 March & 4 April 2013); zero carcasses recovered or collected but 4 reported

Scottish Seafarms - Veantrow Bay, Shapinsay, Orkney: 5 grey seals killed (14 February, 4 March, 28 March & 1 April 2014); 5 carcasses recovered but zero reported or collected

**#3: West of Balta Island, Shetland (Balta Island Seafare): 7**

Balta Island Seafare - West of Balta Island, Shetland (FS0717): 2 grey seals killed (9 August 2014); zero carcasses recovered, reported or collected

Balta Island Seafare - West of Balta Island, Shetland (FS0717): 1 grey seal killed (27 May 2014); zero carcass recovered, reported or collected

Balta Island Seafare - West of Balta Island, Shetland (FS0717): 2 grey seals killed (13 & 28 November 2013); 1 carcass recovered (but not reported or collected)

Balta Island Seafare - West of Balta Island, Baltasound, Shetland (FS0717): 2 grey seals killed (7 & 27 September 2013); zero carcasses recovered, reported or collected

**#4 =: South Voe of Gletness, Shetland (Hjaltland/Grieg): 6**

Hjaltland Seafarms/Grieg Seafood - South Voe of Gletness, Shetland (FS1099): 6 grey seals killed (3, 8, 14, 18, 19 & 23 February 2013); zero carcasses recovered, reported or collected

**#4=: Bellister, Shetland (Scottish Seafarms): 6**

Scottish Seafarms - Bight of Bellister, Shetland (FS1121): 1 grey seal killed (17 December 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Bellister, Dury Voe, Shetland: 3 grey seals killed (8 & 30 May and 6 June 2014); zero carcasses recovered, reported or collected

Scottish Seafarms - Bight of Bellister, Shetland: 1 grey seal killed (15 May 2013); zero carcass recovered, reported or collected

Scottish Seafarms - Bellister, Dury Voe, Shetland; 1 grey seal killed (8 April 2013); zero carcass recovered, reported or collected

**#6 =: Gometra, Isle of Mull, Argyll & Bute (Scottish Salmon Company): 5\***

Scottish Salmon Company - Gometra, Isle of Mull, Argyll & Bute: 3 grey seals killed (20 & 27 January 2015); 3 carcasses reported but zero carcasses recovered or collected

Scottish Salmon Company - Gometra, Isle of Mull, Argyll & Bute: 2 common seals killed (20 & 27 January 2015); 2 carcasses reported but zero carcasses recovered or collected

**#6 =: Loura Voe, Shetland (Scottish Seafarms): 5**

Scottish Seafarms - Loura Voe, Dury Voe, Shetland: 1 common seal killed (18 December 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Loura Voe, Dury Voe, Shetland: 2 grey seals killed (11 & 16 October 2014); zero carcasses recovered, reported or collected

Scottish Seafarms - Loura Voe, Dury Voe, Shetland: 2 grey seals killed (30 August & 19 September 2013); zero carcasses recovered, reported or collected

**#6 =: Taranaish, Loch Roag, Isle of Lewis (Scottish Salmon Company): 5**

Scottish Salmon Company - Taranaish, Loch Roag, Isle of Lewis, Outer Hebrides: 2 grey seals killed (20 March & 2 April 2014); zero carcasses recovered, reported or collected

Scottish Salmon Company - Taranaish, Loch Roag, Isle of Lewis, Outer Hebrides: 1 grey seal killed (12 December 2013); zero carcass recovered, reported or collected

Scottish Salmon Company - Taranaish, Loch Roag, Isle of Lewis, Outer Hebrides: 2 grey seals killed (3 & 5 September 2013); zero carcasses recovered, reported or collected

**#6 =: West Voe, Shetland (Bound Skerries Seafood): 5**

Bound Skerries Seafood - West Voe, Shetland (FS0310): 1 grey seal killed (18 November 2014); zero carcass recovered, reported or collected

Bound Skerries Seafood - West Voe, Shetland (FS0310): 1 grey seal killed (18 September 2014); zero carcass recovered, reported or collected

Bound Skerries Seafoods - West Voe, Shetland (FS/0310): 1 grey seal killed (30 December 2013); zero carcass recovered ("too remote" listed as reason), reported or collected

Bound Skerries Seafood - West Voe, Shetland (FS0310): 2 grey seals killed (26 August & 10 September 2013); zero carcasses recovered, reported or collected ("too remote" listed as reason not to report)

**#10 =: Grunna Voe, Shetland (Scottish Seafarms): 4**

Scottish Seafarms - Grunna Voe, Shetland: 1 grey seal killed (18 December 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Grunna Voe, Dury Voe, Shetland: 2 common seals killed (10 & 14 January 2014); zero carcasses recovered, reported or collected

Scottish Seafarms - Grunna Voe, Shetland; 1 grey seal killed (8 February 2013); zero carcass recovered, reported or collected

**#10 =: Ardchattan Bay, Loch Etive, Argyll & Bute (Dawnfresh): 4**

Dawnfresh - Ardchattan Bay, Loch Etive, Argyll & Bute (FS0197): 1 common seal killed (22 December 2014); zero carcass recovered, reported or collected

Dawnfresh - Ardchattan Bay, Loch Etive, Argyll & Bute - 2 common seals killed (5 November & 4 December 2013); zero carcasses recovered, reported or collected

Dawnfresh - Ardchattan Bay, Loch Etive, Argyll & Bute (FS0197): 1 common seal killed (8 July 2013); 1 carcass recovered but zero reported or collected

**#10 =: Toyness, Scapa Flow, Orkney (Scottish Seafarms): 4**

Scottish Seafarms - Toyness, Scapa Flow, Orkney (FS1024): 2 grey seals killed (5 & 13 September 2013); zero carcasses recovered or collected but 2 reported

Scottish Seafarms - Toyness, Scapa Flow, Orkney (FS1024): 2 grey seals killed (25 March & 13 April 2013); zero carcasses recovered or collected but 2 reported

**#13 =: Rubha Stillig, Loch Fyne, Argyll & Bute (Scottish Salmon Company): 3**

Scottish Salmon Company - Rubha Stillig, Loch Fyne, Argyll & Bute: 3 common seals killed (26 November 2014); zero carcasses recovered or collected but 3 reported

**#13 =: Trilleachan Mor, Loch Seaforth, Isle of Harris/Lewis (Scottish Salmon Company): 3**

Scottish Salmon Company - Trilleachan Mor, Loch Seaforth, Isle of Harris/Lewis, Outer Hebrides: 1 common seal killed (19 September 2014); zero carcass recovered, reported or collected

Scottish Salmon Company - Trilleachan Mor, Loch Seaforth, Isle of Harris/Lewis, Outer Hebrides: 2 grey seals killed (30 May 2014); zero carcasses recovered, reported or collected

**#13 =: Kishorn B, Loch Kishorn, Highland (Scottish Seafarms): 3**

Scottish Seafarms - Kishorn B, Loch Kishorn, Highland (FS0804): 1 common seal killed (29 December 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Kishorn B, Loch Kishorn, Highland (FS804): 1 common seal killed (11 March 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Kishorn B, Loch Kishorn, Highland (FS0804): 1 common seal killed (30 March 2013); zero carcass recovered, reported or collected

**#13 =: Corry, Loch Broom, Highland (Wester Ross Fisheries): 3**

Wester Ross Fisheries/North & West Salmon Management Group - Corry, Loch Broom, Highland (FS/0057): 1 grey seal killed (6 August 2014); zero carcass recovered, reported or collected

Wester Ross Fisheries/North & West Salmon Management Group - Corry, Loch Broom, Highland (FS/0057): 1 common seal killed (27 February 2014) and 1 grey seal killed (20 February 2014); zero carcasses recovered, reported or collected

**#17 =: Grey Horse Channel, Cheesebay, North Uist (Marine Harvest): 2**

Marine Harvest - Grey Horse Channel, Cheesebay, North Uist, Outer Hebrides (FS1122); 1 grey seal killed (22 July 2014); zero carcass recovered, reported or collected

Marine Harvest - Grey Horse Channel, Cheesebay, North Uist, Outer Hebrides (FS1122); 1 grey seal killed (23 April 2014); zero carcass recovered, reported or collected

**#17 =: Isle Ewe, Loch Ewe, Highland (Marine Harvest): 2**

Marine Harvest - Isle Ewe, Loch Ewe, Highland (FS1084); 1 common seal killed (10 November 2014); zero carcass recovered, reported or collected

Marine Harvest - Isle Ewe, Loch Ewe, Highland (FS1084); 1 grey seal killed (3 April 2014); zero carcass recovered, reported or collected

**#17 =: Bring Head, Scapa Flow, Orkney (Scottish Seafarms): 2**

Scottish Seafarms - Bring Head, Scapa Flow, Orkney (FS1023): 1 grey seal killed (19 July 2013); zero carcass recovered or collected but 1 reported

Scottish Seafarms - Bring Head, Scapa Flow, Orkney (FS1023): 1 grey seal killed (22 February 2013); zero carcass recovered or collected but 1 reported

**#17 =: Scallastle Bay, Isle of Mull, Argyll & Bute (Scottish Seafarms): 2**

Scottish Seafarms - Scallastle Bay, Isle of Mull, Argyll & Bute (FS0209): 1 common seal killed (4 February 2014); zero carcass recovered, reported or collected

Scottish Salmon Company - Scallastle Bay, Isle of Mull, Argyll & Bute (FS0209): 1 common seal killed (29 January 2014); zero carcass recovered, reported or collected

**#17 =: Cloudin, Vaila Sound, Shetland (Meridian/Cooke): 2**

Meridian/Cooke - Cloudin, Vaila Sound, Shetland (FS0088): 2 grey seals killed (18 April 2013); zero carcasses recovered, reported or collected

**#17 =: Quanterness, Bay of Kirkwall, Orkney (Meridian/Cooke): 2**

Meridian/Cooke - Quanterness, Bay of Kirkwall, Orkney (FS0908): 2 grey seals killed (15 & 16 April 2013); zero carcasses recovered, reported or collected

**#17 =: Cat Firth, Shetland (Hjaltland/Grieg): 2**

Hjaltland Seafarms/Grieg Seafood - Cat Firth, Shetland (FS0501): 2 grey seals killed (21 February & 3 March 2013); zero carcasses recovered, reported or collected

**#17 =: Loch Carnan, South Uist (Loch Duart): 2**

Loch Duart - Loch Carnan, South Uist, Outer Hebrides: 2 grey seals killed (20 September 2014); zero carcasses recovered, reported or collected

**#17 =: Vidlin, Shetland (Scottish Seafarms): 2**

Scottish Seafarms - Vidlin, Shetland: 2 grey seals killed (18 September & 3 October 2013); zero carcasses recovered, reported or collected

**#17 =: Baltasound Pier, Shetland (Balta Island Seafare): 2**

Balta Island Seafare - Baltasound Pier, Shetland (FS1102): 2 grey seals killed (4 April 2014); 2 carcasses recovered and reported but zero collected

**#17 =: Puldrite Bay, Orkney (Scottish Seafarms): 2**

Scottish Seafarms - Puldrite Bay, Orkney: 2 grey seals killed (4 December 2013); 2 carcasses recovered (but zero reported or collected)

**#17 =: Hamnavoe, Shetland (Meridian/Cooke): 2**

Meridian/Cooke - Hamnavoe, Shetland (FS/1043): 2 common seals killed (27 January 2014); zero carcasses recovered, reported or collected

**#17 =: Lochmadday, North Uist (Loch Duart): 2**

Loch Duart - Lochmaddy, North Uist, Outer Hebrides: 2 grey seals killed (29 November & 13 December 2014); zero carcasses recovered, reported or collected

**#17 =: Outer Eport, North Uist (Scottish Salmon Company): 2**

Scottish Salmon Company - Outer Eport, North Uist, Outer Hebrides: 1 grey seal killed (6 November 2014); zero carcass recovered, reported or collected

Scottish Salmon Company - Outer Eport, North Uist, Outer Hebrides: 1 grey seal killed (2 February 2013); zero carcass recovered, reported or collected

**#17 =: Geasgill, Loch Na Keal, Isle of Mull, Argyll & Bute (Scottish Salmon Company): 2**

Scottish Salmon Company - Geasgill, Loch Na Keal, Isle of Mull, Argyll & Bute: 1 common seal killed and 1 grey seal killed (11 & 22 March 2013); zero carcasses recovered, reported or collected

**#17 =: Druimyeon Bay, Sound of Gigha, Argyll & Bute (Scottish Salmon Company): 2**

Scottish Salmon Company - Druimyeon Bay, Sound of Gigha, Argyll & Bute: 1 unidentified seal killed (12 December 2014); zero carcass recovered or collected but 1 reported

Scottish Salmon Company - Druimyeon Bay, Sound of Gigha, Argyll & Bute: 1 grey seal killed (13 January 2014); zero carcass recovered, reported or collected

**#17 =: Inverawe East, Loch Etive, Argyll & Bute (Dawnfresh): 2**

Dawnfresh - Inverawe East, Loch Etive, Argyll & Bute (FS1067): 1 common seal killed (6 June 2014); zero carcass recovered, reported or collected

Dawnfresh - Inverawe East, Loch Etive, Argyll & Bute (FS1067): 1 common seal killed (15 April 2014); zero carcass recovered, reported or collected

**#17 =: Stringa Voe, Shetland (Bound Skerries Seafood): 2**

Bound Skerries Seafood - Stringa Voe, Shetland (FS0439): 1 grey seal killed (30 October 2014); zero carcass recovered, reported or collected

Bound Skerries Seafood - Stringa Voe, Shetland (FS0439): 1 grey seal killed (11 September 2013); zero carcass recovered, reported or collected ("too remote" listed as reason not to report)

\* Some data for January 2015 was made available by the Scottish Government. GAAIA filed a FOI request on 24 August 2015 requesting all seal-killing data for 2015 (a reply is expected in late September 2015).

**Another 41 sites killed one seal (2013-2014):**

Marine Harvest - Invasion Bay, Loch Sunart, Highland (FS0212): 1 grey seal killed (18 December 2014); zero carcass recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - North Voe, Whalsay, Shetland (FS0946): 1 grey seal killed (15 December 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Lismore West, Loch Linnhe, Argyll & Bute (FS0914): 1 common seal killed (5 November 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Holms, Shetland: 1 grey seal killed (30 October 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Slocks, Ronas Voe, Shetland: 1 grey seal killed (17 October 2014); zero carcass recovered, reported or collected

Marine Harvest - Loch Leven (1), Loch Leven, Highland (FS1084); 1 common seal killed (13 October 2014); zero carcass recovered, reported or collected

Marine Harvest - Torridon, Loch Torridon, Highland (FS0234); 1 common seal killed (24 September 2014); zero carcass recovered, reported or collected

Dawnfresh - Etive 4, Loch Etive, Argyll & Bute (FS1112): 1 common seal killed (6 June 2014); zero carcass recovered, reported or collected

Meridian Salmon Farms - ??????? (FS/0624): 1 grey seal killed (6 May 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Spelve B, Loch Spelve, Isle of Mull, Argyll & Bute (FS0253): 1 common seal killed (25 April 2014); zero carcass recovered, reported or collected

Balta Island Seafare - Baltasound, Shetland (FS0449): 1 grey seal killed (4 April 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Loch Creran D, Loch Creran, Argyll & Bute (FS1047): 1 common seal killed (4 April 2014); zero carcass recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - Linga, Setterness, Shetland (FS1027): 1 grey seal killed (26 March 2014); zero carcass recovered, reported or collected

Loch Duart/North & West Salmon Management Group - Loch A Chairn Bain, Highland (FS/0621): 1 grey seal killed (20 March 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Tanera, Summer Isles, Highland (FS0549): 1 common seal killed and 1 grey seal killed (13 & 16 March 2014); zero carcasses recovered, reported or collected

Scottish Seafarms - Dury Voe, Shetland (FS0033): 1 grey seal killed (10 March 2014); zero carcass recovered, reported or collected

Loch Duart/North & West Salmon Management Group - Sound of Harris, Outer Hebrides; 1 grey seal killed (4 March 2014); zero carcass recovered, reported or collected

Loch Duart/North & West Salmon Management Group - Outer Bay, Loch Droigniche, Highland (FS/0671): 1 common seal killed (28 February 2014); zero carcass recovered, reported or collected

Loch Duart/North & West Salmon Management Group - Calva Bay, Highland (FS/0068): 1 grey seal killed (26 February 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Spelve A, Loch Spelve, Isle of Mull, Argyll & Bute (FS0634): 1 common seal killed (20 February 2014); zero carcass recovered, reported or collected

Scottish Seafarms - Mangester, Mangester Voe, Shetland: 1 grey seal killed (21 January 2014); zero carcass recovered, reported or collected

Scottish Salmon Company - Ardcastle, Loch Fyne, Argyll & Bute: 1 grey seal killed (15 January 2014); zero carcass recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - Swinning Voe, Shetland (FS/0377): 1 common seal killed (8 November 2013); zero carcass recovered, reported or collected

Scottish Seafarms - Nevis B, Loch Nevis, Highland (FS0616): 1 common seal killed (22 October 2013); zero carcass recovered, reported or collected

Marine Harvest - Creag an T'Sagairt, Loch Hourn, Highland (FS0605): 1 common seal killed (16 October 2013); zero carcass recovered, reported or collected

Marine Harvest - Cairidh, Loch Ainort, Isle of Skye, Highland (FS0605): 1 common seal killed (26 September 2013) and 1 grey seal killed (6 September 2013); zero carcasses recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - North Havra, Shetland (FS0674): 1 grey seal killed (27 September 2013); zero carcass recovered, reported or collected

Marine Harvest - Loch Harport, Isle of Skye, Highland (FS0247): 1 common seal killed (25 September 2013); zero carcass recovered, reported or collected

Dawnfresh - Etive 3, Port Na Mine, Loch Etive, Argyll & Bute: 1 common seal killed (18 September 2013); zero carcass recovered, reported or collected

Scottish Salmon Company - Portree, Isle of Skye, Highland: 1 common seal killed (17 September 2013); zero carcass recovered, reported or collected

Scottish Salmon Company - Eughlam, Loch Roag, Isle of Lewis, Outer Hebrides: 1 grey seal killed (6 August 2013); zero carcass recovered, reported or collected

Scottish Salmon Company - Plocrapol, Isle of Harris, Outer Hebrides: 1 common seal killed (25 April 2013); zero carcass recovered and collected but 1 reported

Meridian/Cooke - Papa Westray, Orkney (FS1210): 1 grey seal killed (1 April 2013); zero carcass recovered, reported or collected

Scottish Seafarms - Crooie, Clift Sound, Shetland; 1 grey seal killed (29 March 2013); zero carcass recovered, reported or collected

Scottish Salmon Company - Tuath, Loch Tuath, Isle of Mull, Argyll & Bute: 1 grey seal killed (28 March 2013); zero carcass recovered, reported or collected

Kames Fish Farming - Eilean Coltair, Loch Melfort, Argyll & Bute (FS0777): 1 common seal killed (20 March 2013); 1 carcass recovered, reported and collected

Meridian/Cooke - Meil Bay, Orkney (FS0597): 1 grey seal killed (5 March 2013); zero carcass recovered, reported or collected

Scottish Salmon Company - Inchkenneth, Loch Na Keal, Isle of Mull, Argyll & Bute: 1 common seal killed (5 March 2013); zero carcass recovered, reported or collected

Scottish Seafarms - Puldrite Bay, Orkney (FS0813): 1 grey seal killed (19 February 2013); zero carcass recovered or collected but 1 reported

Hjaltland Seafarms/Grieg Seafood - Punds Voe, Shetland (FS0446): 1 grey seal killed (13 March 2013); zero carcass recovered, reported or collected

Hjaltland Seafarms/Grieg Seafood - East of Papa, Shetland (FS447): 1 grey seal killed (19 February 2013); zero carcass recovered, reported or collected

Marine Harvest - Sconser, Isle of Skye, Highland: 1 common seal killed (15 February 2013); zero carcass recovered, reported or collected

Scottish Seafarms - Holms Geo, Clift Sound, Shetland; 1 grey seal killed (11 February 2013); zero carcass recovered, reported or collected

Scottish Seafarms - Crying Taing and Pobie Suka, Ronas Voe, Shetland; 1 grey seal killed (6 February 2013); zero carcass recovered, reported or collected

## Appendix 2: Previous Correspondence with the U.S. Government

**From:** Don Staniford [mailto:salmonfarmingkills@gmail.com]

**Sent:** 08 May 2013 19:06

**To:** 'NOAA.Staff.Directory@noaa.gov'; 'ciaran.clayton@noaa.gov'; 'justin.kenney@noaa.gov'; 'connie.barclay@noaa.gov'; 'TheSec@doc.gov'; 'kgriffis@doc.gov'; 'monica.allen@noaa.gov'; 'scott.smullen@noaa.gov'

**Cc:** 'JFRobins'

**Subject:** RE: Complaint re. killing of seals & sea lions and MMPA

**Importance:** High

Please pass onto the person dealing with breaches of the MMPA and killing of marine mammals:

Further to [previous correspondence](#) (enclosed below), please find new information released by the Scottish Government naming the salmon farms in Scotland killing seals (online now via "[Scottish Salmon's Seal Killers Named & Shamed](#)").

The damning data reveals that over half of the salmon farms in Scotland claimed to have killed seals as a 'last resort' even though only 13% of sites have predator nets installed!

The worst offenders are the Norwegian-owned companies Hjaltland (Grieg Seafood), Scottish Sea Farms (Leroy/Salmar), Marine Harvest (Meridian/Morpol) and the Scottish Salmon Company. GAAIA is now writing to retailers and the U.S. Government urging a boycott of 'seal-unfriendly' farmed salmon.



FOI data [disclosed](#) late yesterday (7 May) reveals that salmon farms in Orkney & the North Coast, Shetland, Western Isles and on the West Coast of Scotland killed a total of 346 seals (93 common seals and 253 grey seals). During 2011 and the first six months of 2012, 112 different salmon farms killed at least one seal – representing 52% of the [215 active salmon](#)

[farms](#) in Scotland. Fifteen salmon farms accounted for over a third (37%) of the killings – with the ‘Seven Deadliest Salmon Farms’ accounting for a quarter of all killings:

- 18 seals killed – Hjaltland: Lax Firth, Shetland (#333)
- 14 seals killed – Scottish Sea Farms: Veantrow Bay, Orkney (#860)
- 14 seals killed – Lakeland Marine (Meridian): Loch Melfort, West Scotland (#629)
- 13 seals killed – Scottish Salmon Company: Loch Roag, Western Isles (#752)
- 11 seals killed – Scottish Sea Farms: Bring Head, Scapa Flow, Orkney (#1023)
- 10 seals killed – Marine Harvest: Loch Sunart, West Scotland (#413)
- 8 seals killed – Northern Isles Salmon (Meridian): Rousay Sound, Orkney (#645)

Download the data online now for [2011](#) and [2012](#) and other documents [online here](#)

The disclosure comes despite over 12 months of [complaints](#), refusals and delays from both the Scottish Salmon Producers Organisation (SSPO) and the Scottish Government. In December 2012, the SSPO wrote to the Scottish Government claiming that the release of the names of the seal-killing salmon farms would “have a direct impact on the market success of their products” (read the SSPO’s letter in full [online here](#)).



Willie Cowan  
Marine Scotland  
Scottish Government  
Victoria Quay 1-B  
Edinburgh EH6 6QQ

December 6<sup>th</sup> 2012

Dear Willie

**Information Commissioner Decision 193/2012**

Following the recent decision by the Information Commissioner to permit the disclosure of locations where seals have been shot at salmon farms, I have been asked to write to you on behalf of SSPO members.

Our membership is extremely dismayed by this decision and believes it will have a direct impact on the safety of their employees and on the market success of their products. Don Staniford stated in this week’s media that “the consumer now has the opportunity to boycott salmon from the named farms”.

Bearing this additional information in mind, SSPO member companies would expect the Scottish Government automatically to appeal this decision.

Could you please confirm that this is your intention?

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Scott Landsburgh'.

SCOTT LANDSBURGH  
Chief Executive

In January 2013, the Scottish Information Commissioner [delayed disclosure](#) to investigate a [complaint](#) of death threats. Back in [June 2012](#) (following the original FOI request in [April 2012](#) filed by GAAIA) the Scottish Government named the salmon farming companies killing seals but [refused](#) to name the specific sites leading to an [appeal](#) to the Scottish Information Commissioner. Thanks to rulings in [November 2012](#) and [April 2013](#) upholding freedom of information the general public now know the identity of the salmon farms across Scotland slaughtering seals.

GAAIA also published damning data (obtained from Marine Scotland in March 2013) naming all 169 salmon farm sites in Scotland WITHOUT predator nets (download data [online here](#)). The Scottish Government admitted in a FOI reply in [September 2012](#) that 87% of Scottish salmon farms do not even have predator nets – explaining that installing predator nets “requires employing extra trained staff and regular net maintenance and cleaning which costs money and eats into profit margins”. Another [FOI reply](#) from the Scottish Government in March 2013 detailed the 47 salmon farms with predator nets – although only 37 sites were operational and only 25 sites used the predator nets continuously (12 sites kept the nets in storage).

Faced with a [barrage of bad publicity](#) in British Columbia, Marine Harvest Canada installed predator nets at a cost of [\\$250,000 per farm](#) but Marine Harvest and other companies have continued to cut corners in Scotland. If the 169 salmon farms without predator nets in Scotland installed predator nets it would cost the salmon farming industry £27 million (\$42.5 million).

Read more details including a press release and media backgrounder online via "[Lethal Scottish Farmed Salmon: Serial Seal Killers Named & Shamed!](#)"

Finally, to reiterate from my email of September 2012:

"In conclusion, it is clear that the vast majority of Scottish salmon farmers are shooting seals not as a last resort as they claim but more as a first resort. Hence, GAAIA reiterates our view that the US Government should ban imports of ALL Scottish farmed salmon – certainly until any such time that that the 13% of Scottish salmon farms adopting non-lethal marine mammal protection measures are identified."

And from my email of June 2012:

"Have you taken any action since our letter? Now that you have company specific information will you be taking action against those companies responsible for killing marine mammals?"

And from the original [complaint letter](#) filed in October 2011:

"Based on the continued killing of marine mammals, we therefore ask that imports of farmed salmon from those countries and companies sponsoring and sanctioning lethal controls be excluded from the U.S. market. We ask that the U.S. send a strong signal that the killing of marine mammals will no longer be tolerated."

The letter was signed by:

David Ainsley, Sealife Adventures, Scotland

Kurt Beardslee, Wild Fish Conservancy, United States of America

Elsa Cabrera, Centro de Conservación Cetacea, Chile

Juan Carlos Cardenas, Ecoceanos, Chile

Mark Carter, Hebridean Partnership and Marine Concern, Scotland

Ross Flett, Orkney Seal Rescue, Scotland

Bonny Glambeck, Friends of Clayoquot Sound, Canada

Dr. Wolfram Heise, Conservationist, Zürich, Switzerland

Kate Hockley, Cornwall Seal Group, United Kingdom

Dan Jarvis, Cornwall Seal Group, United Kingdom

Ian McAllister, Pacific Wild, Canada

Alexandra Morton, Salmon Are Sacred, Canada

Anissa Reed, Salmon Are Sacred, Canada

John Robins, Animal Concern and Save Our Seals Fund, Scotland

Sue Sayer, Cornwall Seal Group, United Kingdom

Nigel Smith, Seaprobe Atlantis, Scotland

Don Staniford, Global Alliance Against Industrial Aquaculture, Canada

Douglas Tompkins, Fundacion Pumalin and Foundation for Deep Ecology, Chile

Kristine Tompkins, Conservation Land Trust and Conservacion Patagonia, Chile

Paul Watson, Sea Shepherd Conservation Society, United States of America

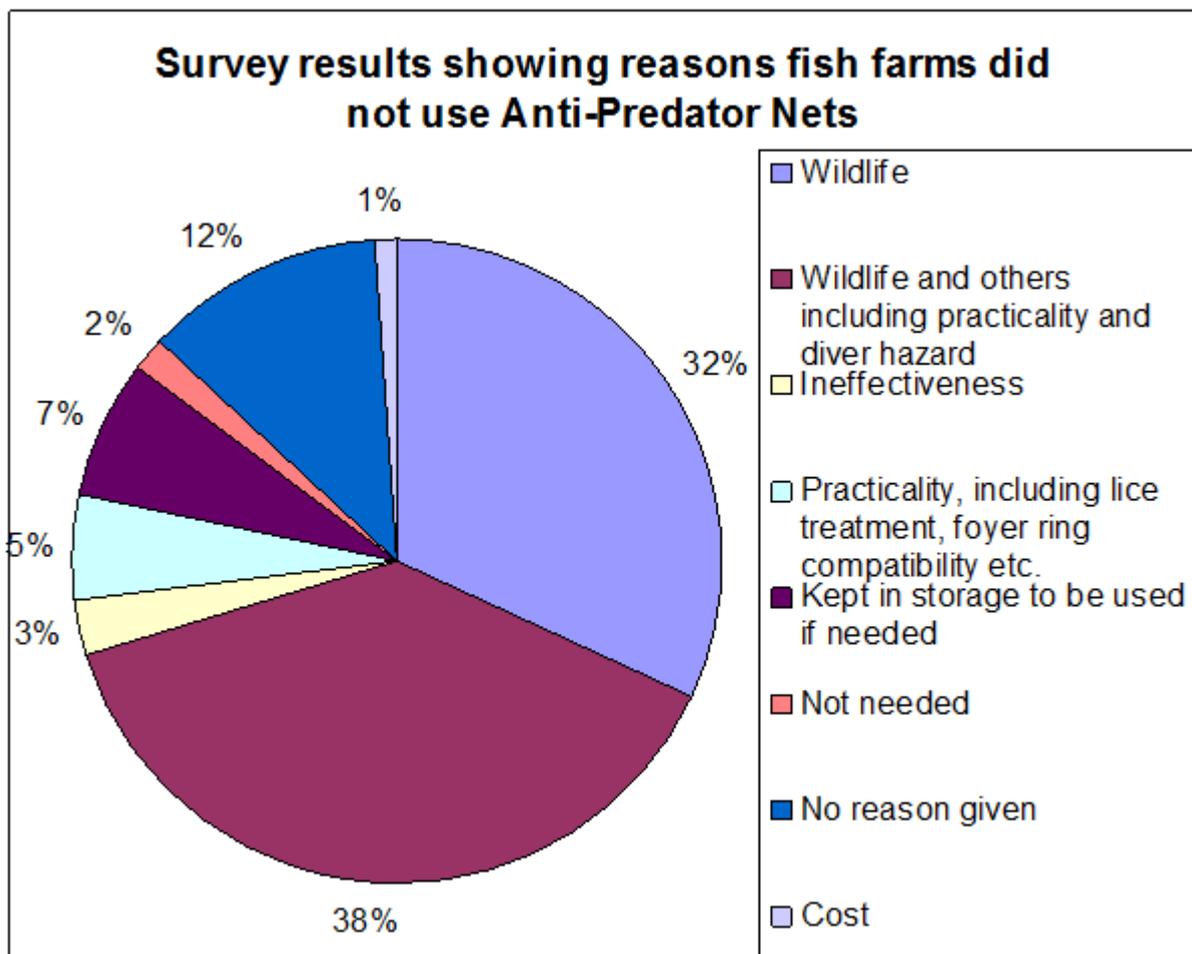
Thanks,

Don Staniford

Global Alliance Against Industrial Aquaculture

<http://donstaniford.typepad.com/my-blog/>





Download the FOI reply from Marine Scotland [online here](#)

The Scottish Government also refused to name the companies concerned. GAAIA has now appealed to the Scottish Information Commissioner asking that all companies who are failing to install anti-predator nets are named.

Read the FOI correspondence with Marine Scotland and appeal to the Scottish Information Commissioner [online here](#)

In conclusion, it is clear that the vast majority of Scottish salmon farmers are shooting seals not as a last resort as they claim but more as a first resort. Hence, GAAIA reiterates our view that the US Government should ban imports of ALL Scottish farmed salmon – certainly until any such time that that the 13% of Scottish salmon farms adopting non-lethal marine mammal protection measures are identified.

For more information read the '[Killing Farms](#)' and '[Killer Panda](#)'

Thanks,

Don Staniford

Global Alliance Against Industrial Aquaculture

Dr. Jane Lubchenco  
Under Secretary of Commerce for Oceans and Atmosphere  
**National Oceanic and Atmospheric Administration**  
**Department of Commerce**  
1401 Constitution Avenue, NW  
Room 5128  
Washington, DC 20230  
United States of America

14<sup>th</sup> June 2012

**RE: Complaint re. killing of seals & sea lions and MMPA**

Further to the complaint filed on 5<sup>th</sup> October 2011 (see below – the letter is also available [online here](#)), please find new information from Scotland on the killing of seals by salmon farming companies.

For first time, the Scottish Government has named those companies responsible for killing seals – including many companies who currently export farmed salmon to the United States.

The information on the number of seals killed during 2011 reveals the following companies responsible for over 200 dead seals:

Hjaltland Seafarms Ltd - 50  
The Scottish Salmon Co Ltd - 45  
Scottish Seafarms Ltd - 37  
Marine Harvest (Scotland) Ltd - 34  
Northern Isles Salmon Ltd (Meridian group) - 22  
Lakeland Marine Farm Ltd - 17  
West Minch Salmon Ltd - 9  
Dawnfresh Farming Ltd – 6  
Loch Duart Ltd - 5  
Bound Skerries Seafoods Ltd - 4

Data for 2012 reveals over 80 dead seals already this year:

The Scottish Salmon Company – 21  
Scottish Sea Farms Ltd - 17  
Hjaltland Seafarms Ltd - 15  
Meridian Salmon Group - 13  
Marine Harvest (Scotland) Ltd - 9  
Loch Duart Ltd - 5  
Dawnfresh Farming Ltd – 1

Save Our Seals Fund also wrote to you in March reiterating concerns in Scotland regarding the killing of seals. John Robins, secretary of Save Our Seals Fund, wrote in his letter:

"Scottish salmon farmers are allowed to shoot and kill seals which come near their farms. This is far less expensive than installing and maintaining the high tensioned, high strength external anti-predator nets required to exclude marine mammals from salmon farms. Only 20% of Scottish salmon farms have any form of anti-predator exclusion nets in place. Instead farmers rely on the Scottish Government giving them licenses to shoot seals. In 2011 farmers were permitted to kill 1,298 seals. This year they can kill up to 1,100 seals. The true figure of seals killed will never be known as the Scottish Government does not police the situation. Farmers employ their own shooters and complete and return their own figures for the number of seals shot.....I urge you to use section 102(c)(3) of the U.S. Marine Mammal Protection Act to ban the import of Scottish Atlantic Salmon into the USA. By doing so you would force salmon farmers here to install proper anti-predator nets thus protecting Scotland's internationally important seal population" (read the letter in full [online here](#)).

The Scotsman also [reported](#) (7 March) on the killing of seals quoting a marksman called 'Dave' (not his real name): "On some sites you shoot from the cages, or on a boat – you do it from the best place possible. As a rule you try to get high, and no more than 120 metres away."

Seal Scotland reported earlier this month that: "In the first year of the government's new seal licensing system they claim that 461 seals have been shot. The latest annual figures which cover the period from 31 January 2011 to 31 January 2012 can be found at [Licences & Returns: 2011](#). The government claims this is a success story, that these figures are far lower than the 3,000 seals that environmental groups had claimed were being killed each year. In fact a Freedom of Information request shows that the number of seals reported to the government as being shot over the three years before licences were introduced was 66, 34 and 10": <http://www.sealscotland.com/2012/06/461-seals-legally-murdered-for-fish-farm-and-sporting-estate-profits/>

The Scottish Government publishes data online via:  
<http://www.scotland.gov.uk/Topics/marine/Licensing/SealLicensing>

Please note also that the killing of both seals and sea lions continues in British Columbia.

Just this week it was revealed that another seal was killed at a farm operated by the Norwegian-owned company Grieg Seafood – read "[Another sea lion drowns at Grieg farm](#)"

In February this year it was also reported that Grieg was being charged for the deaths of dozens of marine mammals: <http://www.farmedanddangerous.org/salmon-farming-problems/environmental-impacts/marine-mammal-deaths/>

Read the charges online here: <http://www.farmedanddangerous.org/wp-content/uploads/2012/02/detailed-information-seals-sea-lions.pdf>

Read the news story in The Globe & Mail online here:  
<http://www.theglobeandmail.com/news/british-columbia/fish-farm-operator-charged-over-dozens-of-seal-sea-lion-deaths/article548433/>

In Chile too, the killing of sea lions is attracting increasing attention:

<http://www.biobiochile.cl/2012/04/19/presentan-100-mil-firmas-para-impedir-plan-que-facilita-la-caza-de-lobos-marinos.shtml>

Read more details via: [http://www.soslobosmarinoschile.cl/sos\\_lobosmarinos/index.php](http://www.soslobosmarinoschile.cl/sos_lobosmarinos/index.php)

Further details concerning the killing of marine mammals by salmon farms are available online via: <http://salmonfarmingkills.com/killing-farms>

Have you taken any action since our letter?

Now that you have company specific information will you be taking action against those companies responsible for killing marine mammals?

A reply would be much appreciated.

Thanks,

Don Staniford, Global Alliance Against Industrial Aquaculture



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
1315 East-West Highway  
Silver Spring, Maryland 20910  
THE DIRECTOR

APR 10 2012

Mr. John F. Robins  
Secretary, Save Our Seals Fund  
P.O. Box 56178  
Dumbarton G82 5YJ  
United Kingdom

Dear Mr. Robins:

Thank you for your letter to Under Secretary Jane Lubchenco regarding reports of seals killed near aquaculture farms in Scotland and your request that the United States ban the import of farmed salmon from such facilities under section 102(c)(3) of the Marine Mammal Protection Act (MMPA).

The MMPA prohibits the intentional killing of marine mammals in commercial fishing operations, which includes aquaculture farms. Specifically, section 101(a)(2) of the MMPA (16 U.S.C. 1371(a)(2)) states that “[t]he Secretary of the Treasury shall ban the importation of commercial fish or products from fish which have been caught with commercial fishing technology which results in the incidental kill or incidental serious injury of ocean mammals in excess of United States standards...” Section 102 (c)(3) states that it is unlawful to import into the United States “...any fish, whether fresh, frozen, or otherwise prepared, if such fish was caught in a manner which the Secretary has proscribed for persons subject to the jurisdiction of the United States, whether or not any marine mammals were in fact taken incident to the catching of the fish.”

In 2010, NOAA’s National Marine Fisheries Service published in the *Federal Register* an advance notice of proposed rulemaking (ANPR; <http://edocket.access.gpo.gov/2010/pdf/2010-10158.pdf>) announcing that we were developing a proposed rule to establish the standards that would determine which commercial fish products would be eligible for importation and deemed in compliance with these import provisions of the MMPA. This rulemaking would define the “United States standards” referred to in MMPA section 101(a)(2), along with any associated criteria by which the United States would assess foreign fisheries that supply fish and fish product imports to the United States. The rule also would describe procedures for ensuring the established standards and their associated criteria are met, as well as procedures for developing recommendations regarding import prohibitions if those standards and associated criteria are not met.

The agency solicited public comments on the ANPR, and after considering public comments drafted a proposed rule, which is now going through interagency review. Once the proposed rule



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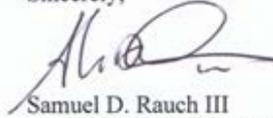
THE ASSISTANT ADMINISTRATOR  
FOR FISHERIES



is published in the *Federal Register*, a public comment period will follow. Public comments will be considered before a final rule is issued.

I appreciate your interest in the protection of marine mammals.

Sincerely,



Samuel D. Rauch III  
Acting Assistant Administrator  
for Fisheries

Dr. Jane Lubchenco  
Under Secretary of Commerce for Oceans and Atmosphere  
National Oceanic and Atmospheric Administration  
Department of Commerce  
1401 Constitution Avenue, NW  
Room 5128  
Washington, DC 20230  
United States of America

Tuesday, 13 March 2012

Dear Dr. Lubchenco,

I was a signatory to the joint letter headed “Killing of seals and sea lions at salmon farms – breach of MMPA” sent to you on 5<sup>th</sup> October 2011. I believe we are still awaiting a response to that letter.

That letter asked you to use the U.S. Marine Mammal Protection Act (MMPA) to ban the import into the USA of salmon from producers who shoot marine mammals. In particular I believe that section 102(c)(3) of the MMPA can be used to impose an import ban on products from salmon farmers engaging in lethal deterrence of seals and other marine mammals. In addition to the clear prohibition under section 102(c)(3) against importation of fish from salmon farms where seals are shot, it is also possible that this activity may fall within the scope of section 101(a)(2) of the MMPA and related import restrictions.

I write to you again to inform you that Scottish salmon farmers have just announced a huge increase in the amount of salmon they sell to your country. In 2011 exports of fresh farmed salmon from Scotland to the United States rose by 36% to 43,703 tonnes. In addition smaller quantities of frozen and smoked Scottish salmon crossed the Atlantic to the U.S. bringing the total value of these exports to £211million. Scotland is now the biggest foreign supplier of farmed Atlantic salmon to the USA.

One of the reasons for this may be that, unlike salmon farmers in your own country, Scottish salmon farmers are allowed to shoot and kill seals which come near their farms. This is far

less expensive than installing and maintaining the high tensioned, high strength external anti-predator nets required to exclude marine mammals from salmon farms. Only 20% of Scottish salmon farms have any form of anti-predator exclusion nets in place. Instead farmers rely on the Scottish Government giving them licenses to shoot seals. In 2011 farmers were permitted to kill 1,298 seals. This year they can kill up to 1,100 seals. The true figure of seals killed will never be known as the Scottish Government does not police the situation. Farmers employ their own shooters and complete and return their own figures for the number of seals shot.

By not having to meet the stringent wildlife protection standards required of salmon farmers in the USA, Scottish salmon farmers have a distinct financial advantage over your own salmon growers.

I urge you to use section 102(c)(3) of the U.S. Marine Mammal Protection Act to ban the import of Scottish Atlantic Salmon into the USA. By doing so you would force salmon farmers here to install proper anti-predator nets thus protecting Scotland's internationally important seal population and the livelihoods of salmon farmers in the US who should not be penalised for meeting your excellent marine mammal protection laws.

Yours sincerely,

John F. Robins,  
Secretary to Save Our Seals Fund

Dr. Jane Lubchenco  
Under Secretary of Commerce for Oceans and Atmosphere  
**National Oceanic and Atmospheric Administration**  
**Department of Commerce**  
1401 Constitution Avenue, NW  
Room 5128  
Washington, DC 20230  
United States of America

October 5, 2011

Dear Dr. Lubchenco,

**Killing of seals and sea lions at salmon farms – breach of MMPA**

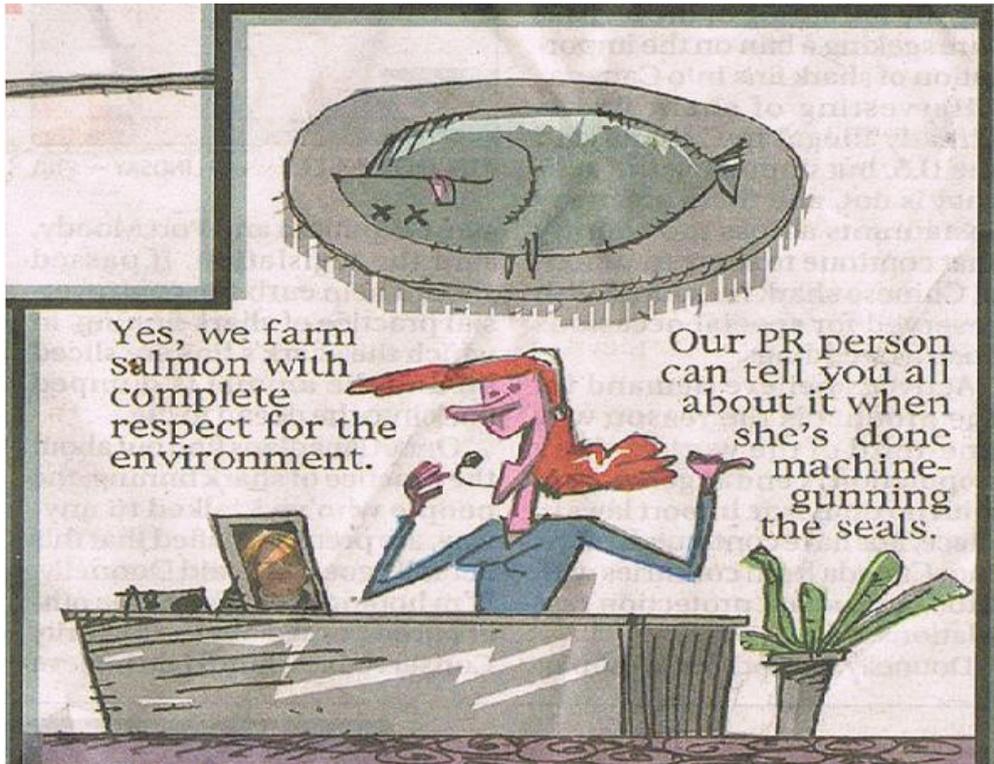
We, the undersigned, write regarding the lethal nature of salmon farming operations and a breach of the U.S. Marine Mammal Protection Act (MMPA<sup>i</sup>). Recent evidence in Canada and Scotland in particular provides damning evidence of the deliberate and systematic shooting of seals and sea lions – including the killing of Steller sea lions (protected under Species at Risk Act in Canada and listed as threatened under the U.S. Endangered Species

Act) earlier this year in the Clayoquot Sound UNESCO Biosphere Reserve in British Columbia.

The killing of marine mammals by salmon farming operations has now become the butt of jokes in Editorial cartoons. For example, the following cartoon was published in the Editorial of The Times Colonist newspaper in Canada on 16<sup>th</sup> September<sup>ii</sup>.



And this cartoon was published in the Editorial of the Province newspaper in Canada on 18<sup>th</sup> September<sup>iii</sup>:



We, however, do not think the killing of marine mammals is a laughing matter or an issue to be taken lightly. The bad joke has gone on long enough and the killing must stop now.

In 2010, U.S. retailer Target announced that it would no longer sell farmed salmon from its stores<sup>iv</sup>. Until salmon farmers stop shooting seals and sea lions we urge other retailers to follow Target's lead. Please don't allow marine mammals to be used as a target for shooting practice.

The U.S. Government has a unique opportunity via the MMPA to step in and demand seal/sea lion-friendly salmon (following on from 'dolphin-friendly tuna'<sup>v</sup>). In 2005, a legal opinion obtained by the National Environmental Trust on 'Prohibition on the Importation of Fish from Salmon Farms Where Seals Are Shot'<sup>vi</sup> concluded that:

"The MMPA provides a strong and directly applicable legal tool to address this problem. Fish caught from the salmon farms operated by companies in foreign countries that engage in lethal deterrence is subject to the importation ban of section 102(c)(3). In addition to the clear prohibition against importation of fish from salmon farms where seals are shot under section 102(c)(3), it is possible that this activity may fall within the scope of section 101(a)(2) of the MMPA and the related import restrictions."

Based on the continued killing of marine mammals, we therefore ask that imports of farmed salmon from those countries and companies sponsoring and sanctioning lethal controls be excluded from the U.S. market. We ask that the U.S. send a strong signal that the killing of marine mammals will no longer be tolerated, especially in relation to salmon farming operations which may market their products in the U.S. as 'organic', 'sustainable' and 'responsible'. Chile, Canada, Norway and Scotland are the four largest export countries to the U.S. market – and in the first six months of 2011, USA imports of all salmon products totaled 132,870 tonnes worth US\$ 1,175 million<sup>vii</sup>.

In Canada, the slaughter of seals on the East coast is common knowledge but on the West coast in British Columbia the killing of seals and sea lions including the protected Steller sea lion by salmon farms has received less public attention. Data published by the Department of Fisheries and Oceans Canada reported the killing of **6,243 seals and sea lions at salmon farms** between **1989 – 2000**<sup>viii</sup>. The Canadian Government report – ‘Salmon farm – Pinniped Interactions in British Columbia: an analysis of predator control; its justification and alternative approaches’ - stated that:

“It should be noted that US legislation and regulations may have implications for fish farms in Canada. The US MMPA of 1972 as Amended, Sec. 102 (c) (3) states that: '[It is unlawful to import into the US] any fish, whether fresh, frozen, or otherwise prepared.....This would seem to indicate that fish harvested from fish farms in a manner that would not be permitted in the US (by shooting seals and sea lions) might not be able to be sold in the US markets, but a legal interpretation is required to evaluate this’<sup>ix</sup>.

Data for 2001 to 2010 is not readily available but new data published by the Department of Fisheries and Oceans Canada for the first three months of 2011 reveals licensed killing of marine mammals as well as ‘accidental drownings’ on salmon farms in British Columbia<sup>x</sup>. *The Vancouver Sun* reported (16<sup>th</sup> September) that:

“Between January and March, 37 harbour seals, 141 California sea lions and two Steller sea lions, which are of “special concern” under the federal Species at Risk Act, were shot and killed at fish farms, according to data posted on the DFO website. Three more harbour seals and a California sea lion drowned at the farms within the same period’<sup>xi</sup>.

For the first time, the names of the companies and sites responsible for the authorized killing of seals and sea lions were reported including EWOS Canada (Mainstream/Cermaq), Marine Harvest and Grieg Seafood<sup>xii</sup>. Living Oceans Society reported in a press release dated 15<sup>th</sup> September<sup>xiii</sup> that:

“The world’s largest salmon farming corporation, Marine Harvest, was the worst offender. At the corporation’s Mahatta West farm in Quatsino Sound, 46 California sea lions were shot between January and March of this year while 19 were killed at their Mahatta East net-pen site and 15 at the Cleagh Creek farm. Eleven harbour seals were shot at the Phillips Arm farm in the Discovery Islands, near the Wild Salmon Narrows. Mainstream killed 47 California sea lions and also shot the two SARA-listed Steller sea lions at the company’s West Side farm in the UNESCO Biosphere Reserve in Clayoquot Sound”.

The killings prompted media interest and condemnation of the companies involved<sup>xiv</sup>. PETA asked (22<sup>nd</sup> September): “Did your salmon dinner kill a sea lion?”<sup>xv</sup>

The killing of Steller sea lions in British Columbia also appears to contravene the Province of British Columbia’s own regulations which include<sup>xvi</sup>: “Killing of predators is only allowed under specific circumstances and with appropriate permits. Lethal seal and sea lion control has decreased dramatically due to advances in predator-prevention practices. Lethal control of Steller sea lions is not permitted. In 2004, DFO replaced the Marine Mammal Predator Control Permit with the Nuisance Seal Licence Under the federal Fisheries Act, a “nuisance seal” includes a seal or sea lion that represents a danger to equipment (including aquaculture net-cages) despite deterrence efforts.”



Photo: A dead and bloated Harbour Seal entangled in a net attached to unused fish farming equipment near Port Hardy, British Columbia<sup>xvii</sup>.

One of the companies involved, Mainstream Canada (owned by the Norwegian company Cermaq), justified the killings by stating publicly via a press release (September 15th) that: “Culling marine mammals is only ever done as a last resort”; “Culling is only ever done under the Authority of our Aquaculture License issued by Fisheries and Oceans Canada (DFO), the agency also responsible for the management, including conservation and protection, of marine mammals in Canada” and “Provisions in the Pacific Aquaculture Regulations allow for DFO to license fish farms to cull marine mammals that pose an imminent danger to the aquaculture facility or human life, should reasonable deterrent efforts fail”<sup>xviii</sup>.

The Vancouver Sun (16<sup>th</sup> September) reported<sup>xix</sup>: “Zero lethal interactions is our goal,” Ian Roberts, a spokesman for Marine Harvest, said in an email. Marine Harvest operates half of the fish farms in B.C., he said, adding that their high volume accounts for the higher number of kills. “We have now purchased additional protector nets to discourage these predators should they return next season,” Roberts said, adding that the first quarter spike in kills is “unusual.” “Disposing of these animals is a last resort,” said Mary Ellen Walling, the executive director of the B.C. Salmon Farmers Association. “We don’t take this lightly.” She said seals and sea lions are “very intelligent, and can be aggressive”.



*Sea lion caught in predator net*

An article – “A Practice that is Impossible to Defend”<sup>xx</sup> – published last week (30<sup>th</sup> September) in *The Courier-Islander* newspaper in Canada included:

“Considering that these corporate salmon farms are camped in the middle of a marine thoroughfare for migrating mammals - and wild fish, too - the obvious way to ensure "zero lethal interaction" would be to get their net-pens out of the ocean... Removing their net-pens from the natural habitat of unmanageable mammals while suffering the deprivation of less profitability must be a much more painful prospect than enduring the anguish of distributing sea lice, polluting, and killing seals and sea lions. And how many seals and sea lions? DFO's numbers are sobering. Of the 13 years reported, 1997 was the worst year for seals when 550 were killed - 500 were common at this time. The worst year for sea lions was 2000 when 250 were shot because they weren't "intelligent" enough to know that salmon farms are lethal. For anyone concerned with this bloodshed, the consolation is that those were only the most bloody years. The killing of 180 animals in 2011 - plus the four that drowned - is excused by the rise in their population, a defence that uses plenitude to justify slaughter.”

An Editorial – “A Smoking Gun is a Smoking Gun”<sup>xxxi</sup> – also published last week (30<sup>th</sup> September) in *The Courier-Islander* stated:

“Between January and March of 2011 141 California sea lions, 37 harbour seals and two Stellar sea lions were killed by the fish farming industry because the animals were a problem around the open net cage fish sites. That's 180 animals in 90 days. Two a day..... Now, however, they are not just farm sites, they are killing fields”.

Writing in *The Westerly News* (29<sup>th</sup> September), Don Staniford asked<sup>xxii</sup>:

“Does anyone else feel that shooting seals and sea lions in a UNESCO Biosphere Reserve is simply wrong?..... The United Nations – which awarded Clayoquot Sound its status as a UNESCO Biosphere Reserve - should step in to keep the peace and stop the killing of hundreds of seals and sea lions each year.”

Yet salmon farming companies in British Columbia have consistently failed to avoid marine mammal mortalities. In 2007, Creative Salmon in the Clayoquot Sound UNESCO Biosphere Reserve were also named as being involved in sea lion deaths. *The Canadian Press*<sup>xxiii</sup> reported that: “The nets of a salmon farm ensnared and drowned 51 California sea lions this month....So far this year, Creative Salmon has reported 110 drowned sea lions, up from 46 in 2006”.

In the same year, the strangling of a Steller sea lion in a salmon farm in the Broughton Archipelago attracted media coverage in both Canada<sup>xxiv</sup> and Norway<sup>xxv</sup> (where Norwegian-owned salmon farming company Cermaq is based). Shocking video footage of the strangled sea lion is available online via YouTube<sup>xxvi</sup>.



*Seal with bullet holes, found near fish farms.*

The killing of marine mammals by salmon farms has a long history. In 2002, an article stated that a single salmon farm in British Columbia accounted for the deaths of 431 harbour seals, 29 sea lions and one harbour porpoise in a 4-year period<sup>xxvii</sup>.



In 2000, a mass grave of 15 sea lions was discovered by Friends of Clayoquot Sound in the Clayoquot Sound UNESCO Biosphere Reserve<sup>xxviii</sup> (watch video footage online<sup>xxix</sup>).



*Pit of sea lions killed by Creative Salmon*

In Scotland, too, the killing of seals has recently hit the headlines with licences to kill 1,298 seals issued for 2011 by the Scottish Government. Andy Ottaway, Director of the Seal Protection Action, said: “An average of over three seals shot every single day is too high a price to pay for Scottish Salmon...The Scottish Government and Salmon industry can and must implement better industry practices and technologies to end these seal killings which leave an indelible stain on the international image of both Scotland and Scottish salmon products”<sup>xxx</sup>.

*The Sun* reported in February this year under the headline “‘Boycott Salmon’ over seal killings”<sup>xxxi</sup> that: “Most of the licences have been given to fish farmers to stop seals breaking through nets to eat their salmon. Last night John Robins, of animal rights groups Animal Concern and Save Our Seals Fund, said: "I am furious that the Scottish Government has passed a death sentence on over a thousand seals. "The Government have lied to us over this. They said seal shooting would only be allowed as a last resort. "Marine Scotland have made

it official — if you buy Scottish salmon you pay for bullets to shoot seals. We are calling on the public to boycott Scottish salmon." A Scottish Government spokesman said: "The shooting of seals should always be a last resort."



Photo: *The Sun* newspaper - Licence to cull ... seal

However, the shooting of seals in Scotland is being used as a first not last resort with most salmon farms not using anti-predator nets. John F. Robins, Save Our Seals Fund, wrote in *The Herald* newspaper in May 2011: "The Scottish Government has admitted that not one salmon farm was visited prior to being granted a licence to shoot seals and Government figures show that 80% of the floating factory-fish farms given licences to shoot seals do not have anti-predator nets. Shooting seals is being used as a first resort, not a last resort"<sup>xxxii</sup>.

In August 2011, *Shetland News* reported that: "SSPCA officers raided Hoganess Salmon, near Walls, on Shetland's west side after reports that seals had been killed illegally. They were supported by the local police and staff from Scottish Natural Heritage"<sup>xxxiii</sup>.

*For Argyll* reported in March 2011<sup>xxxiv</sup> that the slaughter involved the shooting of pregnant seals in the breeding season and stated:

"Why are salmon farmers shooting seals? Seals are intelligent animals and if they get the opportunity and there is only one net between them and the salmon they will, as David Ainsley of Sealife Adventures says: 'push against that net and take lumps out of the salmon'.



Photo: Mark Carter, Marine Concern: [www.marineconcern.com](http://www.marineconcern.com)

So why can it be said that it is unnecessary to shoot seals? Because properly designed, installed and maintained *double* netted cages keep seals and salmon separated. To avoid drowning seals, otters, porpoise and birds, the outer nets must be of the same material and mesh size as the inner nets. And why does the industry not use double nets? Cost, of course. It is obviously cheaper to use single nets and bullets. But the industry is expanding, profitable and can afford to install these double nets.

Why, in an Act whose own guidance declaims that shooting seals should be a last resort, is there no obligation to use double nets and no penalty for failing to do so? Shooting seals as a last resort means that the farms must have tried the most effective non-lethal method (i.e. double nets) *before* they are granted a licence to shoot seals. But 80% of the salmon farms now granted licenses do not have double nets. We do not know why the government has failed to follow its own guidelines but we must act to try to get these licenses rescinded and the cull stopped”.

In 2010, *The Ecologist* reported in an article - “Fish farmers in Scotland killing estimated 2,000 seals a year” - that: “There is an on-going dispute over the number being killed. The salmon industry claims 489 seals were shot in 2008, but Ottaway states, ‘we think that’s a very conservative figure; we believe...aquaculture is probably responsible for 2-2,500 seals being shot’ per year”<sup>xxxv</sup>.



Shooting seals is cheap option - photo from Orkney Seal Rescue/SPAG

In 2009, *The Daily Telegraph* reported that: “Andy Ottaway, of the seal protection group, said: "The seal shooting takes place in very remote locations in sea lochs around Scotland and there are no witnesses, and under the law the industry doesn't even need to release the figures of the numbers they have killed. "We believe there is a mass slaughter of seals in Scotland, up to 5,000 each year”<sup>xxxvi</sup>.

Mark Carter of the Hebridean Partnership told *BBC News* (5<sup>th</sup> April 2009) that: “We have got people who have actually witnessed the shooting on fish farms, and we have had several seals washed up with bullet holes in their heads. The problem is it is not just adults that find them - my children found one washed up on the beach in front of the house. We did an autopsy and the skull was completely shattered”<sup>xxxvii</sup>.

The Seal Protection Action Group (SPAG) in the United Kingdom have attempted to “encourage retailers to only stock ‘seal-friendly salmon’ by insisting formal contracts, with their suppliers stating that they will not shoot seals”. According to SPAG: “In May 2008 two decapitated seals were found in the Kyle of Lochalsh. They were common seals, one a pregnant female the other a juvenile animal, both had been shot. Marine Harvest, a Norwegian owned company that operates over 25 fish farms in Scotland, admitted to the shootings”<sup>xxxviii</sup>.



**KILLED:** About 500 'problem' seals are shot in Scotland every year

Shooting of seals by salmon farmers in Scotland has been practised since the 1990s<sup>xxxix</sup>. A report – “In search of seal-friendly salmon farming” – published in 2009<sup>xl</sup> stated that:

“Ross (1988) sent out 121 questionnaires in 1987, and received 51 returns from Scottish marine salmon farms. She found that shooting of seals occurred at 64% of salmon farm sites, and the estimated total number of seals shot at 30 farms in one year was 206 (i.e. an average of 4.4 seals per farm of 47 farms interviewed). Tangling in un-tensioned anti-predator nets was reported at 32 (68%) of 47 sites visited, with an estimate of 113 seals killed in this way (i.e. an average of 2.4 seals per site interviewed). Total annual mortalities by shooting and

entanglement for 157 marine farm sites active at the time were therefore estimated at about 1050 seals”.

In 2005, *BBC News* reported that: “Scotland's leading fish farm operator has been accused of recklessly shooting seals near one of its sites at Kyle of Lochalsh in the west Highlands. The concerns have been raised at its farm at Loch Alsh. Local tour boat operator Nigel Smith said he had evidence that seals were not being shot cleanly, with animals left to die of their wounds. He added that the killings were adversely affecting his wildlife tourist business”<sup>xli</sup>.



Writing in *The Salmon Farm Monitor* (December 2005), Nigel Smith said: “I might sympathise with an industry that needs to kill seals. Unfortunately, however, it allows the indiscriminate shooting of Scotland's wildlife without any proper controls”<sup>xlii</sup>.

Further evidence of the illegal shooting of seals in Scotland was published by *The Salmon Farm Monitor* in January 2006. Mark Carter wrote that: “I honestly believe that Scottish Sea Farms, the company involved in the slaughter and based at South Shian by Oban, engaged in what can only be described as a mass slaughter of seals. I estimate that the total number of seals shot in and around the Lismore SAC to be in excess of sixty”<sup>xliii</sup>.



Mark Carter's images of seals that have been shot

In December 2005, *The Sunday Express* reported that: “US Government officials are set to ban the import of Scottish salmon from fish farms where seals are shot. The move follows Scottish Sunday Express revelations that seals are being slaughtered in the sea around Skye. A secret cull is being carried out by marksmen for a multi-million-pound salmon giant in a bid to protect their fish stocks. Yesterday it was revealed that government lawyers in

Washington are studying a legal opinion warning that under the US Marine Mammal Protection Act it is illegal to sell fish produced on farms that shoot seals<sup>xliv</sup>.

# US to block seal cull farm salmon

**EXCLUSIVE**  
By Meg Milne



US Government officials are set to ban the import of Scottish salmon from fish farms where seals are shot. The move follows Scottish Sunday Express revelations that seals are being slaughtered in the sea around Skye.

A secret cull is being carried out by marksmen for a multi-million-pound salmon giant in a bid to protect their fish stocks. Yesterday it was revealed government lawyers in Washington are studying a legal opinion warning that under the US Marine Mammal Protection Act it is illegal to sell fish produced on farms that shoot seals.

Amsterdam-based Marine Harvest, which predicts an annual turnover of one billion euros this year, ordered the cull after losing around 3,000 fish. Marine Harvest, part of the giant Nutreco multi-national, which employs 6,000 people in eight countries, insist seals have must be shot to stop them attacking salmon at their Hebrides fish farm.

Yesterday, Don Staniford, the European co-ordinator of Pure Salmon, a fish-farming pressure group, applauded the American move.

Mr Staniford said: "Either the company stops killing seals or they potentially lose access to one of the world's largest farmed salmon markets.

"The simple solution to the problem – as well as escapes, waste pollution and discharges – is to enclose the cages."

On Friday, Mr Staniford attended a Nutreco meeting in Amsterdam and presented a dossier of our revelations to the company's board.

Nutreco bosses were also given a copy of the legal opinion warning of US prohibition on the importation of salmon from their fish farm.

The controversial cull, to the west of Sron an Tairbh at Loch Aish, has been condemned by campaigners demanding seals are given more protection.

Local businessman Nigel Smith, who runs a local wildlife tourist business, photographed some of the dead animals.

Mr Smith said: "When I went past with a boat load of tourists, all they could see was carcasses rotting on the beach.

Marine Harvest insist they only shoot seals "as a last resort".

**SEAL CULL: The animals are being shot to protect fish farms**

In November 2005, *The Sunday Express* reported: "These latest killings are only the tiny tip of a massive iceberg. This slaughter of seals is a dark secret some in fish farming and fishing would no doubt prefer to remain hidden," said Ross Minett, director of Advocates for Animals. "It is thought many thousands are shot around Scotland each year. This figure may well be considerably higher as many injured or dead animals sink and are never found<sup>xliv</sup>.

In 2002, *The Sunday Herald* reported that: "The operator of an award-winning Shetland tourist attraction is to show videos of dead seals to all his passengers in a move aimed at denouncing the practices of the islands' salmon farmers. Jonathan Wills, whose Bressaboats business won the Tourism and Environment category of the Scottish Thistle Awards in 2001, took his decision just before Christmas after spotting a dead seal in a voe on the West of the Shetland mainland. It had been shot with a rifle in the head....."This is Shetland shooting itself in the foot," he said. "Shetland's coastline has become grossly overdeveloped and I want the salmon farming industry in Shetland to recognise seals were there before they were. We are smart enough to stop seals getting into our salmon farms. They only have to use proper predator nets<sup>xlvi</sup>.

In Chile, too, there is recent evidence of the deaths of sea lions due to salmon farm nets. *Wildlife Extra* reported in 2010 that: "The animals get caught in the protective nets surrounding the salmon farms when young and, even if they manage to free themselves, parts of the nets often remain stuck to the sea lions and suffocate them as they grow<sup>xlvii</sup>.



**SLOW DEATH:** A sea lion, with net from a Chile salmon farm caught around its neck

In 2008, *The Patagonia Times*<sup>xlviii</sup> reported: “An Aysén tourism operator recently sent a letter to maritime authorities in Puerto Cisnes describing a dead sea lion discovered on Valle Marta beach, the environmental NGO Ecoceanos reported this week. “The body had two (12 calibre) bullet holes similar to the other 23 sea lion bodies found on the same beach over the past four years,” the letter read. The letter contained photographs of the dead animal, which was found with the remnants of a rope tied around its neck. Presumably the person who killed the sea lion tied rocks to it in order to sink the body. “If one considers that only a small number of the sea lion bodies come back to the surface after being sunk with rock-filled bags, it’s clear that this practice (of killing sea lions) has not stopped despite numerous complaints,” the letter went on to say.”



Photo: injured sea lion from Renihue Fjord in Chile caught in net from a salmon farm

According to Terram (a Chilean NGO), thousands of sea lions in Chile, mostly males, die each year near salmon farms, shot by guards ordered to kill any spotted around salmon farms<sup>xlix</sup>.



Sea lion with bullet holes in its back found in Aysén  
Photo courtesy of Ecoceanos

Canada, Scotland and Chile are not the only countries where salmon farmers kill seals. In New Zealand in July this year it was reported by the *Marlborough Express* that a salmon farmer “admitted charges of possessing an offensive weapon, a galvanised steel pole, in a public place at Ohau Point, and wilfully ill-treating 23 seals by clubbing them to death”<sup>1</sup>.

In Maine, salmon farmers are prohibited from killing seals and sea lions under the MMPA. An article from 1996, for example, reported that:

“Salmon growers in Maine employ a variety of predator control measures-netting systems, underwater acoustic devices and pyrotechnics-but no battery of protections seems to be 100% effective. In the past, those seals who could defeat deterrence strategies would be targeted for lethal, removal. Recent amendments to the Marine Mammal protection Act (MMPA), however now prohibit the killing of depredating seals”<sup>li</sup>.

We also note a 2003 report from SeaWeb which stated that: “Under the Marine Mammal Protection Act, salmon farmers in the United States are prohibited from shooting seals”<sup>lii</sup>. And a press release from the Pure Salmon Campaign in 2006 which stated that:

“Almost all farmed salmon is raised in open ocean pens. Consequently, seals and sea lions swim around these large nets looking for an easy meal. Salmon farmers routinely shoot and kill these marine mammals, animals that are strictly protected in the U.S.”<sup>liii</sup>

The Pure Salmon Campaign also stated in 2007 that: “The Marine Mammal Protection Act in the United States forbids the harassment or killing of marine mammals and the U.S. can forbid the import of any product resulting in the death of marine mammals”<sup>liiv</sup>.

So, if the United States prohibits the shooting of seals and sea lions by salmon farmers in Maine or Washington State then why are salmon farmers in Canada, Chile, Scotland and Norway allowed to kill marine mammals and then export farmed salmon to the United States?

In view of ongoing evidence of marine mammal killings, we respectfully ask that the U.S. Government invoke the MMPA and prohibit the import of farmed salmon from salmon farms in British Columbia, Scotland and Chile.

Yours sincerely,

The Undersigned

David Ainsley, Sealife Adventures, Scotland

Kurt Beardslee, Wild Fish Conservancy, United States of America

Elsa Cabrera, Centro de Conservación Cetacea, Chile

Juan Carlos Cardenas, Ecoceanos, Chile

Mark Carter, Hebridean Partnership and Marine Concern, Scotland

Ross Flett, Orkney Seal Rescue, Scotland

Bonny Glambeck, Friends of Clayoquot Sound, Canada

Dr. Wolfram Heise, Conservationist, Zürich, Switzerland

Kate Hockley, Cornwall Seal Group, United Kingdom

Dan Jarvis, Cornwall Seal Group, United Kingdom

Ian McAllister, Pacific Wild, Canada

Alexandra Morton, Salmon Are Sacred, Canada

Anissa Reed, Salmon Are Sacred, Canada

John Robins, Animal Concern and Save Our Seals Fund, Scotland

Sue Sayer, Cornwall Seal Group, United Kingdom

Nigel Smith, Seaprobe Atlantis, Scotland

Don Staniford, Global Alliance Against Industrial Aquaculture, Canada

Douglas Tompkins, Fundacion Pumalin and Foundation for Deep Ecology, Chile

Kristine Tompkins, Conservation Land Trust and Conservacion Patagonia, Chile

Paul Watson, Sea Shepherd Conservation Society, United States of America

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<sup>i</sup> Marine Mammal Protection Act (1972, amended 2001) <http://www.nmfs.noaa.gov/pr/laws/mmpa/text.htm>

<sup>ii</sup> The Times Colonist, 16<sup>th</sup> September 2011: <http://www.timescolonist.com/opinion/editorial-cartoons/index.html#>

<sup>iii</sup> The Province, 18<sup>th</sup> September 2011: <http://www.theprovince.com/opinion/editorial-cartoons/images/20110918.jpg>

<sup>iv</sup> "Target pulls farmed salmon from its stores" (MSNBC, 26<sup>th</sup> January 2010):

<http://www.msnbc.msn.com/id/35080249/ns/business-retail/t/target-pulls-farmed-salmon-its-stores/>

<sup>v</sup> <http://dolphinsafe.gov/>

<sup>vi</sup> Legal Opinion on 'Prohibition on the Importation of Fish from Salmon Farms Where Seals Are Shot' obtained by National Environmental Trust (December 2005):

[http://www.puresalmon.org/pdfs/MMPA\\_opinion\\_baur\\_letter.pdf](http://www.puresalmon.org/pdfs/MMPA_opinion_baur_letter.pdf)

<sup>vii</sup> "Chile is the largest salmon exporter to USA" (Fish Farming Xpert, 23<sup>rd</sup> September 2011):

[http://www.fishfarmingxpert.com/index.php?page\\_id=76&article\\_id=92543](http://www.fishfarmingxpert.com/index.php?page_id=76&article_id=92543)

<sup>viii</sup> "Marine mammal deaths" (Farmed & Dangerous): <http://www.farmedanddangerous.org/salmon-farming-problems/environmental-impacts/marine-mammal-deaths/>

<sup>ix</sup> "Salmon farm – Pinniped Interactions in British Columbia: an analysis of predator control; its justification and alternative approaches" (Department of Fisheries and Oceans Canada, 2001): [http://www.dfo-mpo.gc.ca/csas/Csas/DocREC/2001/RES2001\\_142e.pdf](http://www.dfo-mpo.gc.ca/csas/Csas/DocREC/2001/RES2001_142e.pdf)

<sup>x</sup> Department of Fisheries and Oceans Canada 'Public Reporting on Aquaculture in the Pacific Region - Marine Mammal Interactions': [http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/mar\\_mamm-eng.htm](http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/mar_mamm-eng.htm)

<sup>xi</sup> "Seal, sea lion kills by salmon farms rise with population" (The Vancouver Sun, 16<sup>th</sup> September):

<http://www.vancouversun.com/technology/Seal+lion+kills+salmon+farms+rise+with+population/5412129/story.html>

<sup>xii</sup> "Authorized predator control activities, January-March 2011" (Department of Fisheries and Oceans Canada)

[http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/docs/mar\\_mamm/predator-predateur/2011-Q1-T1-eng.htm](http://www.pac.dfo-mpo.gc.ca/aquaculture/reporting-rapports/docs/mar_mamm/predator-predateur/2011-Q1-T1-eng.htm)

<sup>xiii</sup> "Salmon farms prove deadly for B.C.'s sea lions" (Living Oceans Society, 15<sup>th</sup> September):

<http://www.livingoceans.org/media/releases/salmon-farming/salmon-farms-prove-deadly-bc%E2%80%99s-sea-lions>

<sup>xiv</sup> "Critics shocked by sea lion deaths at fish farms" (The Westerly News, 22<sup>nd</sup> September):

<http://www.canada.com/Critics+shocked+lion+deaths+fish+farms/5440828/story.html>

"Clayoquot fish farms taking a toll on sea mammals" (Friends of Clayoquot Sound, September):

<http://hosted.verticalresponse.com/717441/9844d6957e/281512073/69923beea6/>

"DFO authorizes fish farm cull of sea lions, seals" (Campbell River Mirror, 20<sup>th</sup> September):

<http://www.bclocalnews.com/news/130225473.html>

"Fish farms killing sea lions and harbour seals" (CBC, 19<sup>th</sup> September): <http://www.cbc.ca/ontheisland/>

(click on 19<sup>th</sup> September to hear audio of an interview with Andrew Trites, the director of the Marine Mammal Research Unit at the University of British Columbia)

"Seal, sea lion kills by salmon farms rise with population" (The Vancouver Sun, 16<sup>th</sup> September):

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