

Global Alliance Against Industrial Aquaculture, 29 November 2015

Scottish Salmon Blinded by Seal Killing

- 80% of farms do not use anti-predator nets; 67% do not use seal blinds

According to the Scottish Government, 80% of salmon farms in Scotland still do not use anti-predator nets and 67% do not use seal blinds despite claims that seals are only shot as a 'last resort' [1]. Read exclusively in today's Sunday Times: "[Seal killing slips through the net](#)".

The damning revelation comes as the number of seals killed on Scottish salmon farms has [leapt by 20 per cent](#). In fact, nearly 700 seals have been killed on salmon farms in Scotland since 2011 with over 50 during the first seven months of 2015. Campaigners will be in [London next month](#) asking Xmas shoppers on Oxford Street to boycott 'seal-unfriendly' farmed salmon.



[Photo by [Colin McPherson](#) - protestors outside M&S in Edinburgh download high res image [online here](#)]

"These shocking figures blow out of the water claims by the salmon farming industry and the RSPCA that seals are shot only as a 'last resort'," said [Don Staniford](#), Director of the [Global Alliance Against Industrial Aquaculture](#). "Trigger-happy salmon farmers are reaching for their guns first and anti-predator nets last. Sadly, bullets are much cheaper than nets and Scottish salmon is as cheap as it is nasty. People buying Scottish salmon this Xmas have the blood of dozens of seals on their hands. Stop the seal slaughter in Scotland by boycotting Scottish salmon."

The revelation that the vast majority of salmon farms in Scotland do not use anti-predator nets and seal blinds came in a letter from Richard Lochhead, Cabinet Secretary for Rural Affairs, Food and the Environment, in reply to a query from [Roderick Campbell MSP](#). "I agree that it is deeply unfortunate that some salmon farms consider it necessary to shoot seals," said Roderick Campbell MSP, the [species champion for the Harbour seal](#), in an email

to GAAIA [1]. "I recognise the need to protect very valuable fish stocks, but I also appreciate that this should not come at the cost of lives of seals."

"I am pleased to support those campaigning for an end to seal deaths," said [Alison Johnstone, Member of the Scottish Parliament](#), who joined a protest outside [M&S in Edinburgh](#) last month. "People buying farmed salmon in Scotland will be appalled to learn that there is no requirement on salmon producers to have nets to deter seals. If those making vast profits from salmon sales aren't prepared to invest in this preventative measure, they cannot claim that shooting a seal is a last resort. It is a lazy, greedy response that contradicts the image the producers and our supermarkets seek to promote and it has to stop."



[Photo by [Colin McPherson](#): [Alison Johnstone MSP](#) handing out leaflets outside M&S in Edinburgh: download high res image [online here](#)]

"The price for 'seal-friendly' farmed salmon is the installation of anti-predator nets and that could be £1 million for each salmon farm," continued [Staniford](#). "Given that there are currently [143 active salmon farms](#) in Scotland then the cost could be over £100 million. Until all salmon farms install anti-predator nets consumers should boycott all Scottish salmon - even RSPCA Assured, Aquaculture Stewardship Council-certified and Soil Association-certified 'organic' salmon which all shamefully endorse the killing of seals. Next time you're in a supermarket or restaurant please ask whether a seal died for your salmon meal."



Shamefully, the RSPCA as well as other certification bodies such as the Soil Association and the Aquaculture Stewardship Council sanction the killing of seals as a 'last resort' [2]. The RSPCA brands over 70% of Scottish salmon farms as 'welfare friendly' via the RSPCA Assured (formerly Freedom Food) scheme (read more via "[RSPCA Assured seal killers!](#)").

'Seal friendly' salmon is possible - some salmon farmers such as Grieg Seafood (Hjaltland Seafarms) have virtually eliminated the killing of seals by installing 'Eco-Nets' at a cost of £40,000 per cage (£1 million for a 25-cage farm). "From shooting too many seals we've gone to shooting nothing," claimed Grieg Seafood's production manager Grant Cumming in [The Shetland Times](#) last month [3].

The latest data obtained from the Scottish Government via Freedom of Information [4] reveals that Scottish Seafarms, the Scottish Salmon Company and Marine Harvest are still slaughtering seals. In the first seven months of 2015 (January to July), a total of 51 seals were killed on salmon farms in Scotland with Marine Harvest killing 15 seals, Scottish Seafarms killing 12 and the Scottish Salmon Company killing 11.

By contrast, Grieg Seafood (Hjaltland Seafarms) has killed only one seal thus far in 2015 - a drastic decrease from the 50 seals killed in 2011, 49 in 2012, 30 in 2013 and 6 in 2014. Meanwhile, Marine Harvest has recently increased the number killed with 15 dead seals already during the first seven months of 2015 compared to 7 during the whole of 2014 and 5 during 2013.

The two worst sites - both slaughtering five seals - were Gometra, Isle of Mull (The Scottish Salmon Company) and Sconser, Isle of Skye (Marine Harvest). Other salmon farms killing more than two seals were Toyness, Orkney (Scottish Seafarms) with four seals killed and Invasion Bay, Loch Sunart (Marine Harvest) and Shuna Sound (Marine Harvest) where three seals were killed.

Of the 51 seals killed this year (January to July 2015), zero carcasses were recovered or collected and only three were reported to the [Scottish Marine Animal Strandings Scheme](#). Out of 173 seals killed during 2013 and 2014 a total of 19 carcasses (11%) were reported, 16 carcasses recovered (9%) and only one carcass (<1%) collected (read more via "[Appendix: Companies, Regions & Sites](#)").

An [exclusive analysis](#) by GAAIA of all the data made available by the Scottish Government (i.e. for the [first two quarters of 2015](#), [2014](#), [2013](#), [2012](#) and [2011](#)) reveals that nearly 700 seals have been killed by salmon farmers since 2011 when [official Scottish Government statistics](#) were first collected. Scottish Seafarms (who exclusively supply Marks & Spencer) are Scotland's worst serial killers with 150 dead seals followed by Grieg Seafood Hjaltland (136 seals killed), the Scottish Salmon Company (128 seals killed) and Marine Harvest (76 seals killed).

GAAIA is organising protests in London outside M&S and Selfridges on Oxford/Orchard Street (9 December) and outside the RSPCA's head office in Horsham, West Sussex (10 December) - details [online here](#). The message from protestors is simple: [Stop shooting seals for salmon meals!](#)

Background:

On 30 August 2015, GAAIA wrote to [supermarkets](#), [RSPCA Assured/Freedom Food](#), the [Soil Association](#) and the [Aquaculture Stewardship Council/WWF](#) demanding an end to 'seal-unfriendly' farmed salmon - for more details read [online here](#).

Last month, GAAIA submitted [formal comments](#) to the US Government calling for a ban on all imports of 'seal-unfriendly' farmed salmon [5].

A [Scottish Government survey in 2011/2012](#) revealed that 87% of salmon farms in Scotland do not use predator nets [6].

A report - "[The use of Anti-Predator Controls at Scottish Marine Salmon Farms](#)" - published in 2002 published by Fisheries Research Services indicated that less than 10 salmon farms used seal blinds (but that nearly 100 salmon farms used "shooting") [7].

GAAIA wrote earlier today (29 November 2015) to the Scottish Government including the question: "If 80% of the salmon farming industry do NOT use anti-predator nets and 67% do NOT use seal blinds then how can the industry and the Scottish Government claim that seals are shot as a "last resort"?" [8].

Video & Photo Resources:

Watch [videos with Don Staniford reporting](#) from the West coast of Scotland:



Scottish Seal Killers!



Marine Harvest: Stop Shooting Seals!

Download High Res images via:

["Did a seal die for your salmon meal?"](#)

["Farmed salmon: sealed with a kiss of death"](#)

["Stop shooting seals for salmon meals"](#)

["M&S: Seal Killers"](#)

["Scottish Seal Killers"](#)

["The Scottish Seal Killers"](#)

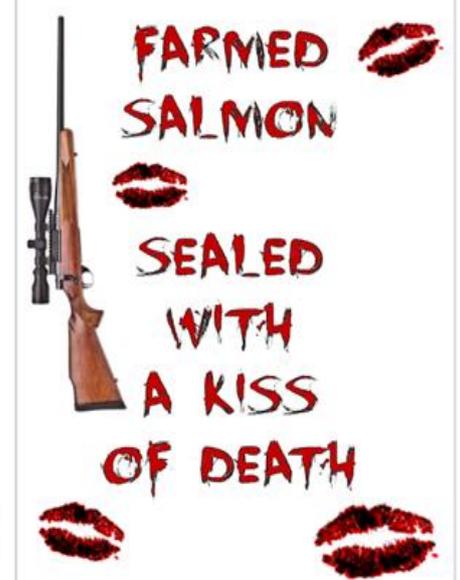
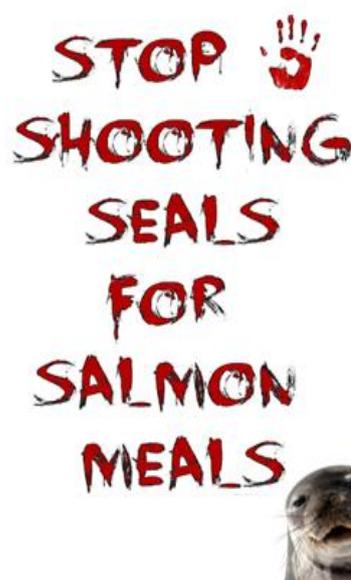
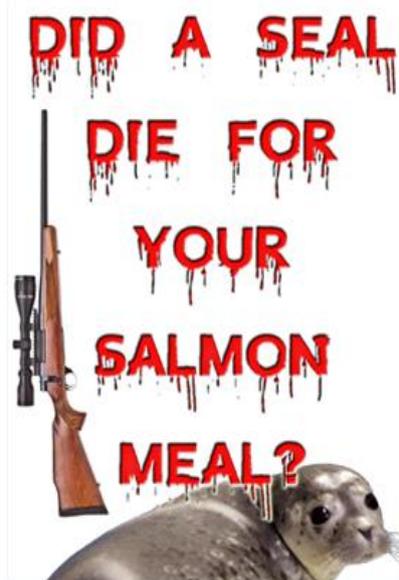
["RSPCA Assured Seal Killers"](#)

["RSPCA as the Royal Seal Culling Association"](#)

["Salmon farming kills seals"](#)

["Salmon farming: licensed to kill"](#)

["Salmon farming is the smoking gun"](#)



Media Coverage:

["RSPCA Assured Seal Killers!"](#) (23 November 2015)
["M&S Caught in Cross-Fire Over Seal-Killing on Scottish Salmon Farms"](#) (2 November 2015)
["Stop shooting seals for salmon meals - protest outside M&S in Edinburgh"](#) (30 October 2015)
["Shetland Times: 'Steps taken to reduce number of seals killed'"](#) (25 October)
["Stop shooting seals for salmon meals!"](#) (22 October 2015)
["Did a seal die for your salmon meal?"](#) (9 October 2015)
["RSPCA attacked for its policy on seal shooting"](#) (9 October 2015)
["RSPCA: Seals should be shot as an 'absolute last resort' to protect salmon"](#) (9 October 2015)
["Seal Protection Action Group: Dependent seal pups are left to starve if their mothers are shot"](#) (9 October 2015)
["Salmon farmers under fire for shooting seals"](#) (8 October 2015)
["Seals in Shetland are getting into deep water with the salmon industry"](#) (8 October 2015)
["Fury over seals shot dead at M&S salmon farms: Humane 'predator-proof' nets can be installed but are expensive"](#) (5 September 2015)
["Shetland fish farms top seal shooting list"](#) (3 September 2015)
["Mapped: every Scottish salmon farm that shot seals"](#) (2 September 2015)
["UK retailers may face 'zombie seal' protests over farmed salmon"](#) (2 September 2015)
["Marks & Spencer faces threat of 'zombie seal' protests over links to salmon farm with worst culling record"](#) (1 September 2015)
["Anti-fish farm campaigners propose boycott to defend seals"](#) (1 September 2015)
["M&S salmon supplier comes off worst as Scottish gov't names seal shooting farmers"](#) (31 August 2015)
["Seal shooting figures released after campaign by animal rights activists"](#) (30 August 2015)
["Figures reveal salmon farms that shoot seals"](#) (30 August 2015)
["Named and shamed: the Scottish salmon farms shooting seals"](#) (30 August 2015)
["Data reveals third of Scots fish farms have shot seals"](#) (30 August 2015)
["Cecil the Seal Killers Named & Shamed in Scotland - Call for Boycott of 'Seal Unfriendly' Scottish Salmon"](#) (30 August 2015)
["Media Splash for Seal-Killing Salmon Farms!"](#) (8 July 2015)
["VICTORY: Disclosure of Seal-Killing Salmon Farm Data Ordered by 21 August"](#) (7 July 2015)
["Landmark Rulings on Seal-Killing Salmon Farms - Scottish Information Commissioner to publish decisions this afternoon"](#) (7 July 2015)
["D Day for Seal-Killing Salmon Farms"](#) (6 July 2015)
["Scottish Salmon's Secret Seal Killers! - FOI refusal prompts call for boycott of farmed salmon"](#) (24 August 2014)

For more information please see GAAIA's "[The Killing Farms](#)"

Contact:

Don Staniford: 07771 541826 (salmonfarmingkills@gmail.com)

Notes to Editors:

[1] A letter from Richard Lochhead, Cabinet Secretary for Rural Affairs, Food & the Environment (22 October 2015) to Roderick Campbell MSP includes the statement that "a third (of fish farms) use seal blinds and a fifth use anti-predator nets":

As Dr McLeod mentioned during the debate, all fish farms included in applications for a seal licence already employ at least one and many a range of non-lethal alternatives. All use tensioned nets, almost half use Acoustic Deterrent Devices (ADDs), a third use seal blinds and a fifth use anti-predator nets.

Read the letter in full [online here](#) (p1) and [online here](#) (p2)

Here's the correspondence:

From: Rhuaraidh.Fleming@scottish.parliament.uk
[<mailto:Rhuaraidh.Fleming@scottish.parliament.uk>] **On Behalf Of**
Roderick.Campbell.msp@scottish.parliament.uk
Sent: 17 November 2015 17:33
To: salmonfarmingkills@gmail.com
Subject: FW: Seal Deaths

Dear Mr Staniford,

Further to previous correspondence, regarding seal deaths, you will be aware that I wrote to Dr Aileen McLeod on 17 September in relation to non-lethal deterrents. I received a response to this correspondence from Richard Lochhead MSP – I apologise for the delay in providing you with a copy of that response. Please find attached, a copy for your information.

Mr Lochhead has noted that there are restrictions on the use of some non-lethal measures, due to their potential impact on other marines species, but I note that he has provided statistics regarding the type, and number, of non-lethal deterrents used at fish farms. In particular, I note that approximately 50% of farms use more than one such deterrent.

I hope that this information is helpful.

Yours sincerely,

Roderick Campbell MSP.

From: Rhuaraidh.Fleming@scottish.parliament.uk
[<mailto:Rhuaraidh.Fleming@scottish.parliament.uk>] **On Behalf Of**
Roderick.Campbell.msp@scottish.parliament.uk
Sent: 17 September 2015 17:55
To: salmonfarmingkills@gmail.com
Subject: Seal Deaths

Dear Mr Staniford,

Further to your email of 31 August in relation to the shooting of seals at Scottish salmon farms, I would like to try to address your concerns.

In the first instance, you may be aware that I led a Members' Business Debate in the Scottish Parliament on Wednesday 9 September in relation to seal population decline and unexplained seal deaths. The Official Report of this debate is available here:

<http://www.scottish.parliament.uk/parliamentarybusiness/report.aspx?r=10070>

I would advise at this stage, however, that I did not seek to discuss the recent publication of the names of salmon farms that had shot seals. I felt that this would have been inappropriate, given the nature of the debate.

Notwithstanding this, however, Dr Aileen McLeod, Minister for Environment, Climate Change and Land Reform did address this issue. In her closing statement during the debate, Dr McLeod stated that a report on the operation of the seal licensing system, under which the seals you have referred to were shot, was recently published. I have, so far, been unable to consider this report in any detail but a copy is available here:

<http://www.gov.scot/Publications/2015/09/5131/1>

Notwithstanding this, I also note Dr McLeod's comments that 56% fewer seals are being shot now than was the case prior to the implementation of the Marine (Scotland) Act 2010, which introduced the seal licensing system.

I agree that it is deeply unfortunate that some salmon farms consider it necessary to shoot seals. I recognise the need to protect very valuable fish stocks, but I also appreciate that this should not come at the cost of lives of seals. To that end, I have written to Dr McLeod in relation to the use of "non-lethal" deterrents and I have attached a copy of that response for your information. I will be sure to provide you with a copy of Dr McLeod's response as soon as I receive it.

I hope that this is helpful.

Yours sincerely,

Roderick Campbell MSP.

FOR EMAIL 15 September 2015

Dear Aileen,

Further to my Members' Business Debate on Wednesday 9 September on the aforementioned issue, I would like to thank you for your contribution to the debate. I am aware that some aspects of seal conservation remain controversial, in particular I am aware that my Debate came only one week after the publication of data in relation to licenced seal shootings at Scottish salmon farms.

I note, from your closing statements, that you advised "*all companies have at least one non-lethal deterrent measure and that many have more than that*". I would be very grateful if you could advise what steps have been taken to encourage those companies with only one non-lethal deterrent to invest in more. I would also appreciate confirmation of what non-lethal measures are currently being practiced.

As I am sure you will appreciate, I have had interested parties contact me as species champion for the harbour seal, and I would welcome any comments that I may be able to share with them.

Yours sincerely,

Roderick Campbell MSP.

[2] Here's the section of the [RSPCA's welfare standards for farmed Atlantic salmon](#) (September 2015) sanctioning the killing of seals:

HP 7.14 The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer that all of the procedures leading up to the point of last resort have been mobilised.

i The repeated shooting of seals without having deployed all of the measures leading to a last resort scenario, will result in the site being suspended from the scheme pending further investigation.

-
- HP 7.15** There must be positive identification that a seal is causing the problem of fish mortality, or is the cause of compromised fish welfare.
- HP 7.16 *** The humane dispatch of any seal must only be undertaken as a last resort in order to protect the welfare of the fish and where all non-lethal methods have failed to do so.
- HP 7.17 *** Before the humane culling of seals as a last resort can be considered, the following must have been implemented:
- a) nets are adequately tensioned
 - b) top nets secured to deny ingress by predators into the enclosure
 - c) dead fish have been regularly removed
 - d) where appropriate, ADDs/ASDs have been mobilised and are working properly
 - e) predator nets/curtains/screens have been deployed where it is appropriate to do so.
- HP 7.18 *** The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer, that all of the steps leading up to a last resort scenario have been implemented.
- HP 7.19 *** Where it becomes necessary to humanely dispatch a seal as a last resort, the following records must be kept:
- a) names of all persons with valid firearms certificates who are deemed competent to perform the task
 - b) details of any bullets used and returned in the ammunition register
 - c) details of any animal that has been shot, including:
 - i) the species
 - ii) the time and date of dispatch
 - iii) the location
 - iv) the reason for the shooting
 - v) the number of fish killed before resorting to a lethal method
 - vi) the number of fish on site.
- HP 7.19.1*** In the case of members of the Freedom Food scheme, all the details in HP 7.19 relating to seal shootings must be reported to the Freedom Food office, within 72 hours.
- HP 7.20** All attempts must be made to recover the body of the animal that has been shot and it must be recorded as to whether or not the body was recovered.
- HP 7.21** Any carcases must be disposed of in accordance with the law.
- HP 7.22** Seals must not be shot outside the Crown Estate lease area.
- HP 7.23** After every shooting incident, a review of all predator exclusion procedures must be undertaken and records kept of such reviews.

In June 2015, the RSPCA made "[key changes](#)" but maintained their shoot-to-kill policy on seals:

June 2015

Key¹ changes to the RSPCA welfare standards for farmed Atlantic salmon

As part of the on-going process of reviewing the welfare standards, they have now been amended and updated, and include the addition of new standards and guidance. All the amendments to the current version of the [RSPCA welfare standards for farmed Atlantic salmon](#), dated October 2012, were sent to Freedom Food members on 9th June 2015 and these changes will come into force on 9th September 2015, unless otherwise stated by a standard. This document provides further information on the rationale underpinning the decision/s for making key amendments to the standards.

Husbandry Practices		
Current standard	New/Amended standard	Reason for change and further information
	New standard HP 7.16 The humane dispatch of any seal must only be undertaken as a last resort in order to protect the welfare of the fish and where all non-lethal methods have failed to do so.	It was felt to be necessary to make the previous information box into a standard, so that the last resort scenario is explicit within the main body of the document.
	New standard HP 7.17 Before the humane culling of seals as a last resort can be considered, the following must have been implemented: a) nets are adequately tensioned b) top nets secured to deny ingress by predators into the enclosure c) dead fish have been regularly removed d) where appropriate, ADDs/ASDs have been mobilised and are working properly e) predator nets/curtains/screens have been deployed where it is appropriate to do so.	This has now been elevated into a standard, from its previous status as an information box. This defines the last resort scenario, so that there can be no doubt as to what it means.
	New standard HP 7.18 The producer must be able to demonstrate to the Freedom Food Assessor or the RSPCA Farm Livestock Officer, that all of the steps leading up to a last resort scenario have been implemented.	This will provide verification that all of the steps have been taken.
Current standard HP 6.16 Where it becomes necessary to humanely dispatch a seal, the following records must be kept: a) names of all persons with valid firearms certificates who are deemed competent to perform the task b) details of any bullets used and returned in the ammunition register c) details of any animal that has been shot, including: <ul style="list-style-type: none"> • the species • the time and date of dispatch • the location • the reason for the shooting. 	Amended standard HP 7.19 Where it becomes necessary to humanely dispatch a seal as a last resort, the following records must be kept: a) names of all persons with valid firearms certificates who are deemed competent to perform the task b) details of any bullets used and returned in the ammunition register c) details of any animal that has been shot, including: <ul style="list-style-type: none"> i) the species ii) the time and date of dispatch iii) the location iv) the reason for the shooting v) the number of fish killed before resorting to a lethal method vi) the number of fish on site. 	The fish are never mentioned in many of the reports which appear about seal shooting. The addition of including the number of fish involved in seal attacks helps to provide important information regarding the facts surrounding this issue.
	New Standard HP 7.19.1 In the case of members of the Freedom Food scheme, all the details in HP 7.19 relating to seal shootings must be reported to the Freedom Food office, within 72 hours.	This used to be a voluntary requirement. It is now mandatory and will help to ensure that information relating to this important issue is provided to the scheme in a consistent and timely manner.

Download as a PDF [online here](#)

Read more via:

["RSPCA Assured Seal Killers!"](#)

["RSPCA upsets people by saying seal shooting is OK"](#)

["RSPCA attacked for its policy on seal shooting"](#)

["RSPCA: End your support for the killing of Scottish seals"](#)
["Letter to the RSPCA: Public Pledge to Stop Certifying Seal-Killing Salmon Farms"](#)
["Mass seal slaughter as RSPCA opts to protect fish farms"](#)
["RSPCA Freedom Food fish farmers killing seals"](#)

The Aquaculture Stewardship Council also sanction the killing the seals at salmon farms. The [ASC farmed salmon standards \(June 2012\)](#) actually specifies the number of "lethal incidents" permitted - with as many as eight animals including two marine mammals such as seals or sea lions allowed to be killed over a prior two year period!

Criterion 2.5 Interaction with wildlife, including predators²⁷

INDICATOR	STANDARD
2.5.6 Maximum number of lethal incidents ³⁵ on the farm over the prior two years	< 9 lethal incidents, ³⁶ with no more than two of the incidents being marine

³⁵ Lethal incident: Includes all lethal actions as well as entanglements or other accidental mortalities of non-salmonids.

³⁶ Standard 2.5.6 applicable to incidents related to non-endangered and non-red-listed species. This standard complements, and does not contradict, 2.5.3.

Final Salmon Aquaculture Dialogue Standards for the Aquaculture Stewardship Council, June 13, 2012

Read more via:

["The Abominable Salmon Council"](#)
["WWF Greenwashes Marine Harvest"](#).
["Killer Panda"](#)

Here's the Soil Association's policy supporting the killing of seals:

3 September 2015

Don Staniford
 Director of the Global Alliance Against Industrial Aquaculture

Dear Mr Staniford,

Thank you for your letters dated 30 August 2015 to our offices in Bristol and Edinburgh.

Companies licensed under Soil Association organic standards are only permitted to cull seals as an absolute last resort after every possible deterrent has been explored and it is only permitted under licenses issued and controlled by the Scottish Government.

Our records show that in the past 3 years, one seal has been culled on a Scottish organic fish farm currently licensed with Soil Association Certification. This action was an absolute last resort at the time and was permitted under licenses issued and controlled by the Scottish Government.



South Plaza, Marlborough Street,
 Bristol, BS1 3NX

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Read more via:

["Letter to the Soil Association: public pledge to stop certifying seal-killing salmon farms"](#)

["Organic Scamon: the greenwashing of toxic farmed salmon"](#)

["Why organic salmon is causing a nasty smell"](#)

[3] Here's an article published in [The Shetland Times](#) (16 October 2015):

12 | Friday, 16th October, 2015 | *The Shetland Times*

The logo for The Shetland Times, featuring the letters 'ST' in a stylized, gothic font.

FISHING

Steps taken to reduce number of seals killed at isles sites

Scottish government figures have showed that Shetland has been one of the worst areas in Scotland for shooting seals in the vicinity of salmon farms.

The most killing took place at East Voe Laxfirth, where Grieg Seafood Hjaltland shot 24 seals between February 2013 and August 2014.

The same company also shot six seals in South Voe, Gletness in this period.

Other Shetland companies to

but with the plastic nets this was not possible.

Mr Cumming said: "It's a good news story. We have been investing heavily to stop shooting. We have invested £1million each year in the last two years.

"We realise shooting seals is very bad PR (public relations) and not something our guys like doing."

However, unlike Grieg Seafood Hjaltland, which employs 250 people and is responsible for 50

shoot seals included Balta Island Seafare, which shot seven, and Scottish Seafarms, which shot six at Bellister, five at Loura Voe and four at Grunna Voe.

However, the situation is improving with fewer seals being shot thanks to new nets to protect salmon, according to Grieg Seafood Hjaltland production manager Grant Cumming.

He said only one grey seal had been shot in January – the only one to be shot this year.

This drop in numbers has been due to the installation of plastic “econets”, which Mr Cumming likened to a security fence, attached to the handrail of the pen and weighted down with heavy chain.

He said: “From shooting too many seals we’ve gone to shooting nothing.”

Twenty-six of these new econets, costing £40,000 each, have been installed in pens in the worst affected areas of Laxfirth and sites closest to Lerwick Harbour.

Near the harbour, Mr Cumming said, the seals were almost tame and “looked upon us as a Macdonald’s drive-through for breakfast”.

Previously the seals could push the nets in and reach the salmon,

per cent of Shetland production, not all salmon farms have invested in the econets.

Don Staniford, director of the Global Alliance Against Industrial Aquaculture (GAAIA), said: “Shetland’s trigger-happy salmon farmers are bringing shame to the Scottish salmon farming industry.

“Bullets are cheap and Shetland farmed salmon is cheap and nasty. The price for seal-friendly farmed salmon is predator nets and that could be £1 million per farm.”

Mr Staniford applauded Grieg Seafood Hjaltland’s installation of econets, but acknowledged they were very expensive.

He added: “A single salmon farm in Shetland spent over £1million on [new] predator nets at a 26-cage farm.

“If you assume (based upon a Scottish government survey in 2011/2012) that 87 per cent of the industry do not use these 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.”

Watch ITV News (8 October 2015) [online here](#) - including an admission from Grieg Seafood (Hjaltland Seafarms) that the [Norwegian-owned company](#) has shot too many seals:



In an interview with Grieg Seafood's Grant Cumming broadcast on [ITV News](#) (8 October 2015), ITV's consumer correspondent Chris Choi said:

"This site came top of the list for killing seals - with something like 24 in two years. That's not the kind of thing that is going to be popular with shoppers is it?"

"No - absolutely," replied Grant Cumming. "I think we realise that we have shot far too much in this area and that's something we've had a real determination to change. And that's what led us down the line with these [Econets](#)."

Read more via "[Drive to end seal shooting in Shetland](#)" and "[Shetland fish farms top seal shooting list](#)"

Read more via ITV News:

"[Salmon farmers under fire for shooting seals](#)"

"[Seals in Shetland are getting into deep water with the salmon industry](#)"

"[More than 100 seals shot this year to protect salmon industry](#)"

"[Killing seals to protect salmon - the welfare dilemma](#)"

[4] Download all the source data online via "[Appendix 1: 2015 Seal Killing Return Forms \(January to July\)](#)"

[5] Read GAAIA's formal submission to the US Government [online here](#).

 **Comment from Don Staniford**

This is a Comment on the **National Oceanic and Atmospheric Administration (NOAA) Proposed Rule: [Fish and Fish Product Import Provisions of the Marine Mammal Protection Act](#)**

For related information, [Open Docket Folder](#) 

Comment

In summary, the Global Alliance Against Industrial Aquaculture (GAAIA) urges the US Government to scrutinize the global salmon farming industry with respect to the intentional killing of seals and sea lions in particular.

For more background please read the attached letter sent on 30 August 2015 to NOAA's Under Secretary of Commerce for Oceans and Atmosphere, Dr. Kathryn Sullivan.

The letter includes:

"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."

Document Information

ID: NOAA-NMFS-2010-0098-0054
Tracking Number: 1jz-8lgk-jl83

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Date Posted:
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Submitter Information

Submitter Name:
Don Staniford

And ends with:

"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."

Please read the attached letter for more detailed evidence and supporting material.

Thanks.

City:
Dundonnell
Country:
United Kingdom
State or Province:
Ross-shire
Organization Name:
Global Alliance Against Industrial
Aquaculture

Attachments (1)



[Letter to US Department of Commerce 30 August 2015](#)

View Attachment: 

"GAAIA points you to a [recent article in the Shetland News](#)," stated an [additional email submission](#) (2 October 2015) to the US Government. "In particular, please note the following:

"Last year Grieg Seafood Hjaltdland, 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."

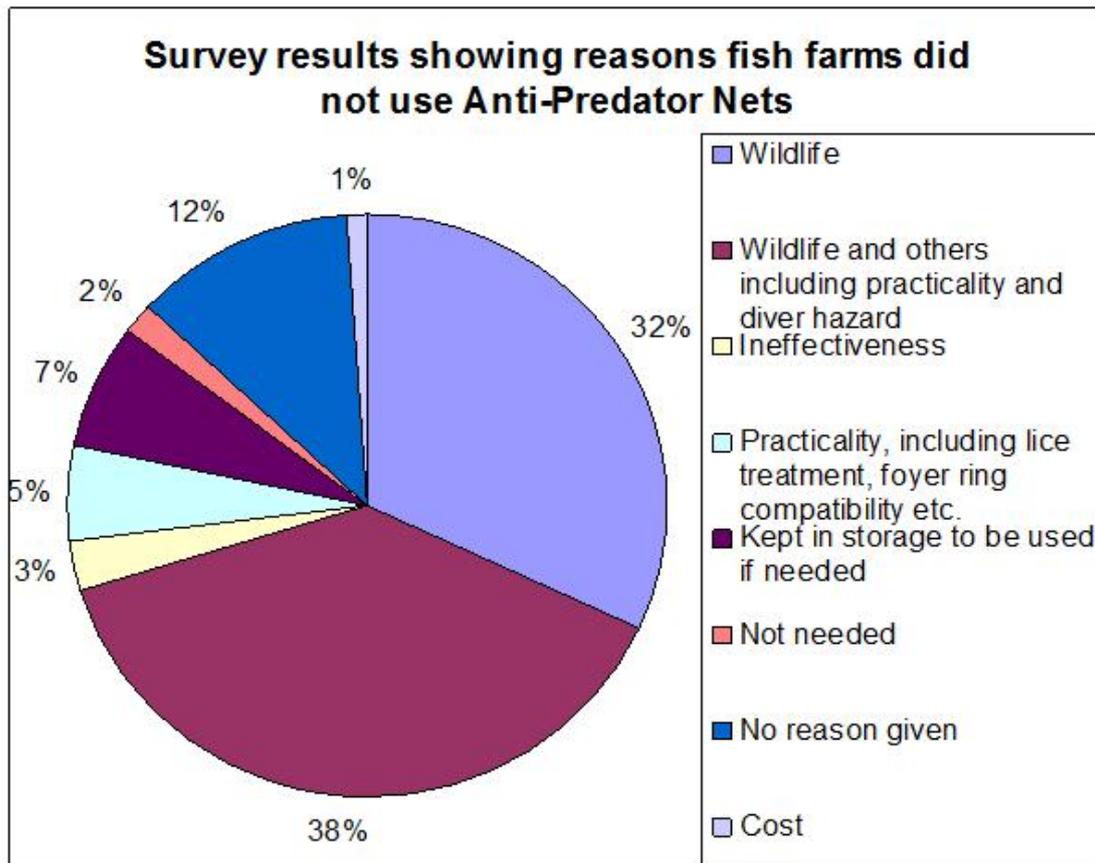
Therefore, a single salmon farm in Shetland spent over £1 million on predator nets at a 26-cage farm. If you assume (based upon a [Scottish Government survey in 2011/2012](#)) that 87% of the industry do NOT use predator nets and there are 143 active salmon farms (based on the [latest Scottish Government 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."

[6] A [Scottish Government survey in 2011/2012](#) revealed that 87% of salmon farms in Scotland do not use predator nets - belying the salmon farming industry's claim that seals are killed only 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"](#)

[7] A report - ["The use of Anti-Predator Controls at Scottish Marine Salmon Farms"](#) - published in 2002 by Fisheries Research Services indicated that less than 10 salmon farms used seal blinds (but that nearly 100 salmon farms used "shooting"):

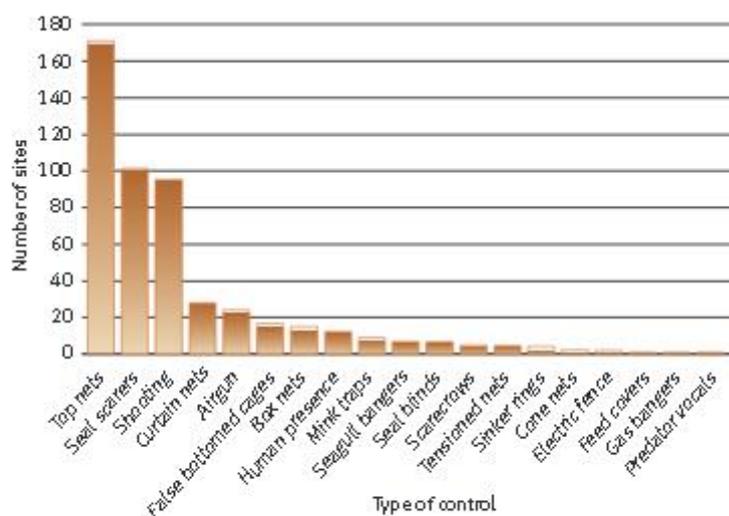


Figure 2: The number of sites at which each of the 19 predator control methods was used.

A report - "[Investigations on Seal Depredation at Scottish Fish Farms](#)" to Marine Scotland by the Seal Mammal Research Unit in July 2013 included:

Seal blinds are an area of the base of the net where thicker material is used in an effort to conceal dead fish from seals underneath. The blind is positioned at the lowest point of the net or around the 'mort sock' where dead fish will normally accumulate. Seal blinds are typically 3m by 3m up to about 5m by 5m squares of netting. In fact we learned that several companies have experimented with other measures to conceal dead salmon or strengthen the base of the cages, and some have also tried false bottoms, by installing a separate net below the base of the cage.

The Times [reported](#) in April 2015:

"Some farms have installed 'seal blinds', fine mesh at the base of cages which stops seals from seeing the fish".

The Scottish Salmon Producers Organisation issued a [statement](#) in August 2015 including:

"For example, farmers often use "seal blinds" at the bottom of the pens, made from very small mesh net to prevent the seals seeing any fish in the bottom of the pen"

[8]

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

Sent: 29 November 2015 08:36

To: 'Richard.Lochhead.msp@scottish.parliament.uk'; 'scottish.ministers@gov.scot'; 'Aileen.McLeod.msp@scottish.parliament.uk'

Cc: 'alison.johnstone.msp@scottish.parliament.uk'; 'Roderick.Campbell.msp@scottish.parliament.uk'; 'Carey.Cunningham@gov.scot'; 'Stephen.Bruce@gov.scot'; 'Oana.Racu@gov.scot'; 'Ian.Walker@gov.scot'

Subject: Seal killing at salmon farms - "last resort"?

Further to today's Sunday Times article (enclosed below), what steps are the Scottish Government taking to increase the use of anti-predator nets and seal blinds on salmon farms?

Please note that a letter from Richard Lochhead, Cabinet Secretary for Rural Affairs, Food & the Environment (22 October 2015) to Roderick Campbell MSP (following a query directed at Dr Aileen McLeod) included the statement that "a third (of fish farms) use seal blinds and a fifth use anti-predator nets":

As Dr McLeod mentioned during the debate, all fish farms included in applications for a seal licence already employ at least one and many a range of non-lethal alternatives. All use tensioned nets, almost half use Acoustic Deterrent Devices (ADDs), a third use seal blinds and a fifth use anti-predator nets.

Read the letter in full [online here](#) (p1) and [online here](#) (p2)

If 80% of the salmon farming industry do NOT use anti-predator nets and 67% do NOT use seal blinds then how can the industry and the Scottish Government claim that seals are shot as a "last resort"?

For example, a report - "[The use of Anti-Predator Controls at Scottish Marine Salmon Farms](#)" - published in 2002 by Fisheries Research Services indicated that less than 10 salmon farms used seal blinds (but that nearly 100 salmon farms used "shooting"):

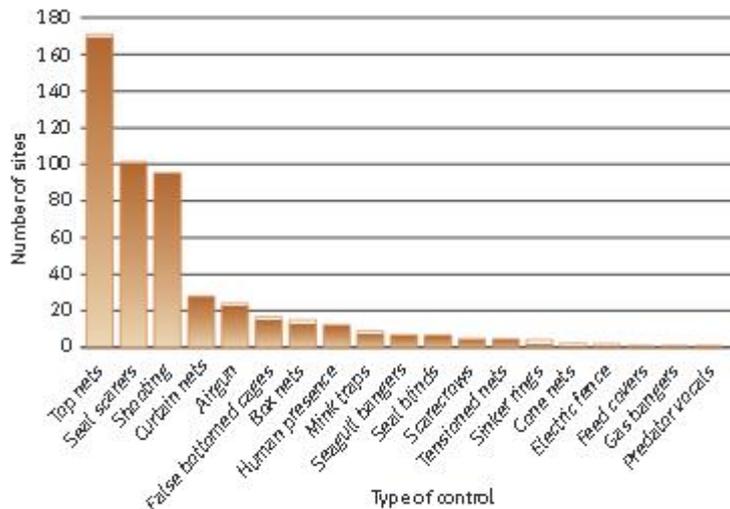


Figure 2: The number of sites at which each of the 19 predator control methods was used.

Do you have same data as above for 2015?

It seems painfully clear (to seals at least) that salmon farmers across Scotland are reaching first for the gun and not exhausting the other 18 predator control options listed in the above graph.

The definition of "last resort" seems to have been corrupted.

For example, the [Cambridge English Dictionary](#) defines "last resort" as "if all other methods fail".

Since (in 2002 at least) there were 19 predator control methods then how can shooting be defined as a "last resort" when other methods such as seal blinds and anti-predator nets are not being universally used?

The [Oxford English Dictionary](#) defines "last resort" as "A final course of action, used only when all else has failed".

Again, how can the shooting of seals be deemed "last resort" when all other options have not been tried first?

Seal killing slips through the net

Mark Macaskill Published: 29 November 2015

Comment (undefined) Print



Fewer seals are being shot overall, but numbers last year rose 20% (Terry Eve Photography/Getty)

JUST one in five salmon farms in Scotland has installed the most effective method of deterring seals, data reveals, prompting fresh criticism of claims that the animals are shot as “a last resort”.

Scottish environment secretary Richard Lochhead has said that 80% of salmon farms do not use anti-predator nets to prevent seals attacking salmon cages.

While all sites in Scotland are fitted with some form of seal deterrent, evidence suggests that anti-predator nets, which encompass the entire farm and provide a first wall of defence against marine predators, are the most effective, and at an average cost of £1m to install, the most expensive.

The latest data on seals shot by salmon farms, covering January-July of this year, shows that Grieg Seafood, which has fitted anti-predator nets at its farms, killed one seal. Companies that have not fitted anti-predator nets have shot many more. They include Marine Harvest, which killed 15 seals, Scottish Sea Farms (12) and the Scottish Salmon Company (11).

Compared with the same period last year, the number of seals shot by salmon farms in Scotland rose 20%, although ministers insist that the overall trend is down, with a 55% reduction in seal shooting over the past four years.



Anti-predator nets are the most effective deterrent for salmon farms but cost £1m to install (Scottish Viewpoint)

Campaigners have renewed calls for bodies such as the RSPCA to withdraw their endorsement of farmed salmon produced by firms that have not installed the nets and protests are planned next month in London and outside the RSPCA head office in Sussex.

“The price for seal-friendly farmed salmon is the installation of predator nets and that could be £1m for each salmon farm,” said Don Staniford, an environmental campaigner. “Given that there are 143 active salmon farms in Scotland and one in five have installed them, the cost to the Scottish salmon farming industry could be well over £100m. Until all salmon farms install predator nets, consumers should boycott all Scottish salmon.”

Lochhead outlined the position on seal deterrents in a letter to Roderick Campbell MSP, who recently led a members’ debate in the Scottish parliament on the declining seal population.

An increasingly popular option at farms is to fit the bottom of nets with blinds that hide salmon from seals.

“All fish farms included in applications for a seal licence already employ at least one, and many a range of, non-lethal alternatives,” wrote Lochhead. “All use tensioned nets, almost half use acoustic deterrents, a third use seal blinds, and a fifth use anti-predator nets.”

“The use of such measures has contributed to an overall reduction of 55% in seal shooting since the system was introduced in 2011.”

In correspondence with Staniford, Campbell wrote it was “deeply unfortunate that some salmon farms consider it necessary to shoot seals. I recognise the need to protect very valuable fish stocks, but I also appreciate that this should not come at the cost of the lives of seals.”

Online via http://www.thesundaytimes.co.uk/sto/news/uk_news/scotland/article1639295.ece